# Procuring with everybody in mind: A guide to procuring accessible ICT for Higher Education providers

## Version control

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| Version | Date | Status / Updates |
| 0.1 | 23 June 2022 | First draft for ADCET feedback |
| 0.2 | 27 July | Updated incorporating feedback |
| 1.0 | 29 September 2022 | Updated incorporating feedback, provided details about NDCO, ADCET and advisory |

## Introduction and Background

Like any organisation, tertiary education institutions have a crucial role to play in advancing accessibility. They host thousands of students, employ thousands of staff and represent a considerable level of expenditure in the economy. Nowhere is this more the case than with respect to information technology products. Tertiary education institutions are developing or procuring hardware and software platforms at an increasing speed.

At the same time, the number of students with disability who study is increasing rapidly, and more and more people with disability are attempting and succeeding in winning jobs in the education sector. It is therefore critical that staff and students with disability, as well as members of the public, can use websites, e-learning platforms, collaboration tools, audio-visual equipment, multi-function printers and any number of other software and hardware products which form the basis of activity at any tertiary education institution. An increasing amount of ICT development and delivery is for an online world although there are still crucial ICT products and services access on campus.

It is in this environment that ADCET (Australian Disability Clearinghouse on Education and Training) and the NDCO (National Disability Coordination Officer Program) commissioned this accessible procurement guide.

Tertiary education institutions in Australia are well placed to use their considerable purchasing power of information and communications technologies (ICT), to advance digital inclusion of persons with disability. Public procurement processes are a highly effective policy tool to promote the accessibility of (ICT) equipment, software, applications and services. Embedding accessibility within procurement processes benefits the institutions just as much as individuals with a disability.

The calls for more effort to adopt principles of Universal Design for Learning (UDL) are increasing in volume and frequency. ADCET recently cited research by the National Centre for Student Equity in Higher Education (NCSEHE) conducted by Associate Professor Tim Pitman which did just that.

“UDL [and a ‘human rights by design’] approach ensures that buildings, technology, products, and services can be used by virtually everyone, regardless of ability. The greater the level of accessibility, the greater the number of students who will not need reasonable adjustments made to their educational experience. This should be a focus for the increasing use of online and remote learning technologies.”[[1]](#footnote-2)

Procuring accessible ICT products and services is a critical enabler to achieving this goal.

Vision Australia’s 2018 report ‘On-Line but Off-Track’ highlighted several significant barriers experienced by blind and low vision people in the tertiary education sector. The report included recommendations designed to begin the process of mitigating these barriers. From the perspective of procurement, issues which were called out included:

* Inaccessibility of key components of online learning environments, such as discussion boards and collaborative tools, to the most common assistive technology used by people who are blind or have low vision.

And

* Inconsistency in the provision of reasonable adjustments when inaccessible ICT is encountered.

A key recommendation from Vision Australia’s report was that that Universities Australia (UA) work with universities to adopt AS EN 301 549, the Australian Standard for Accessible ICT. As ADCET noted in May 2022, Australia formally adopted EN 301 549 with ratification by Standards Australia in 2016.This standard was updated in 2020 to reflect WCAG 2.1. AS EN 301 549 provides a reference point for government and other sectors to work with vendors on a universally accepted standard for accessible procurement.

The standard includes details about required specifications to support a variety of human variance, including vision, hearing, speech, dexterity, neurological triggers, neurodiversity, cognition, and privacy.

AS EN 301 549 covers practical elements of procurement for technologies including and beyond the web: terminals, office equipment, voice and telecommunications, hardware, software, workstation specifications and more.

ADCET further suggested that adopting this standard is a critical means by which the Higher Education sector can meet their obligations under the Disability Standards for Education. It proactively supports the policy direction provided in Australia's Disability Strategy Priority 3: Improve pathways and accessibility to further education and training for people with disability[[2]](#footnote-3).

In March 2022, ADCET and NDCO commissioned Intopia (a digital accessibility company with a track-record of working on accessibility policy and process issues) to prepare a guide which ADCET can offer to higher education institutions in Australia, to be overseen by an expert advisory panel.

The guide provides:

* Examples of suitable text which can be used in accessible procurement policies, Requests for Information/Proposal/Quotation, contract clauses and ICT Risk Registers
* Information to support higher education institutions and vendors to meet AS EN 301 549
* Scenarios and stories of how procurement can affect the outcomes for students and staff
* Example testing procedures to evaluate potential purchases against the standards
* Guidance relating to existing software and hardware about how and why to enable accessibility features
* Guidance about what Universities can do quickly and now, to make fast inroads for current and future students and staff.

Unfortunately, there will be times when responses from vendors and delivered ICT products or services fall short of accessibility standards. The guide provides information on how to identify known defects, work with vendors to resolve issues and provide equivalent access when there are accessibility failures.

## How to use the Guide

The guide has been organised into a series of stand-alone but complementary documents which can be drawn from when undertaking procurement of ICT products and services. They include

* suggested wordings
* non-technical explanations of complex technical standards
* the Australian legislative and regulatory context
* advice on what steps to take at different stages of the procurement process

None of the suggested wordings should be seen as inviolate: as with any clauses in any legal documents, institutions should consider whether they are suitable for their specific circumstances from a legal and commercial perspective. However, they are based on examples which have been used elsewhere and provide institutions with suggestions upon which to base their own approaches.

We have also provided a list of references and useful sources of further reading.

## About ADCET

The Australian Disability Clearinghouse on Education and Training (ADCET) is funded by the Australian Government Department of Education under the Higher Education Disability Support Program and is hosted by the University of Tasmania.

ADCET’s mission is to contribute to the improvement of the educational experiences and to the successful outcomes for students with disability in post-secondary education.

## About the NDCO Program

The National Disability Coordination Officer Program is funded by the Department of Education to drive change so that people with disability have equitable opportunity to access, participate and achieve their goals in tertiary education and subsequent employment. NDCOs are involved in a broad range of projects at a national, state and local level, and work strategically with stakeholders to address the systemic barriers experienced by people with disability engaging in tertiary education and subsequent employment.

## About Intopia

Intopia is a social enterprise which provides advice and support to organisations wishing to improve their digital accessibility.

It works with organisations in the public, private, educational and not-for-profit sectors to raise their digital accessibility maturity and to ensure they meet best practice in digital access. Its work ranges from highly technical and detailed reviews, strategic consultancy and training on all aspects of digital accessibility.

## About the advisory panel and project team

The Advisory Panel comprised of:

* Darren Britten, National Assistive Technology Project Officer, NDCO Program
* Bruce Maguire, Lead Policy Advisor – Vision Australia
* Francois Jacobs, Student & Staff – Deakin University
* Gunela Astbrink, Chair of Accessibility Standing Group – Internet Society
* Sam Germein, Systems Librarian – University of South Australia
* Andrew Normand, Web Accessibility Lead, University of Melbourne
* Erica Schurmann, Senior Advisor (Disability) – Curtin University
* Jason Markou, Digital Accessibility Lead – University of Sydney
* Matthew Sherwood, Library Data & Design Officer – LibUX, Western Sydney University
* Steve Johnston, Director, Strategic Procurement - CAUDIT
* Natasha Edwards, Copyright Librarian, Flinders University
* Brigitta Norton, Accessibility Specialist and Digital Strategist - OZeWAI

Expertise, advice and/or feedback was provided by:

* Dr Ronny Andrade, Digital Accessibility Lead, RMIT University
* Kim Neville, Digital Accessibility Practice Lead, Australian National University

The project team comprised of:

* Darlene McLennan, Manager – Australian Disability Clearinghouse on Education and Training
* David Swayn, National Disability Coordination Officer – STEPS Group Australia
* Paul Power, National Disability Coordination Officer – Wodonga Institute of TAFE
* David Tran, National Disability Coordination Officer – Deakin University

The Intopia team comprised of:

* Dr Andrew Arch, Principal Consultant
* Neil Jarvis, Business Development Consultant
* Jen Vass, Project Manager

This resource would not have been possible without the support, open sharing of information, skills and knowledge provided by people with lived experience and expertise relating to using, purchasing, and implementing accessible ICT. The project team is grateful for the engagement from all involved.

1. Pitman, T. (2022). [*Supporting persons with disabilities to succeed in higher education: Final report.*](https://www.ncsehe.edu.au/publications/persons-disabilities-higher-education/) [↑](#footnote-ref-2)
2. Commonwealth of Australia. (2021). [*Australia's Disability Strategy 2021-2023*](https://www.disabilitygateway.gov.au/document/3106). [↑](#footnote-ref-3)