

## Human Factors (HF); European accessibility requirements for public procurement of products and services in the ICT domain (European Commission Mandate M 376, Phase 1)

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## Foreword

This Technical Report (TR) has been produced by ETSI Technical Committee Human Factors (HF). The work was co-funded by the EC/EFTA in response to Phase I of EC Mandate M 376 [i.141], and was developed in close coordination with CEN BT WG 185 and CENELEC CLC-BT WG 101-5, during September 2007 - September 2008.

NOTE: The ETSI Drafting Rules specify that ETSI Technical Reports shall be entirely informative.

In cases where national or international standards, requirements or legislation, currently applied to the public procurement of ICT products and services in the EU and EFTA are reported or referred to in the present document, the intention of the original verbal forms has been preserved for information purposes and with respect to the original sources. The use of quotation marks would have introduced inconsistencies due to language translation and other related issues.

Therefore, the "shall" and "must" verbal forms used in the present document are NOT to be taken as normative requirements for the purposes of this entire document.

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## 0 Executive summary

The present document was prepared in response to the ETSI part of Phase I of Mandate M 376 [i.141] from the European Commission to CEN, CENELEC and ETSI, which requires the provision of an inventory of European and international accessibility requirements in order to harmonize and facilitate the public procurement of accessible ICT products and services.

The Mandate required the generation of an inventory of ICT products and services together with a listing of the functional accessibility requirements of those products.

An initial study of the Common Procurement Vocabulary (CPV) code list revealed that over 100 ICT product categories or products could be identified as products that might be bought by public procurers. The range of ICT products and services actually purchased through government procurement services were determined in a study conducted using the codes listed in Tenders Electronic Daily (TED) (see <http://ted.eur-op.eu.int/>) and through questioning of national representatives throughout Europe and in other countries.

The main products identified in this study were computer hardware, photocopying and printing equipment, telecommunications equipment, software, installation, configuration and set-up services, maintenance services, upgrade services, customization and telecommunication services (e.g. fixed and mobile telephony). The study is described in clause 5 and those few ICT products and services publicly referred to in national information are set out in more detail in annex C, which also contains references to national procurement legislation.

It was noted that TED can provide an open and transparent record of products and services purchased by Government agencies but the level of information varied significantly between countries, the difference to some extent reflecting the relative maturity of national procurement legislation.

Furthermore it was found that this procurement information could be distorted by certain National practices. In many countries the national regulator uses the obligations of the Universal Service Directive [i.23] to mandate the provision of accessible products and services by an operator with significant market power. This generates a hidden procurement-

like situation without any payment appearing between a Government and the affected telecom operator. Thus there is no public information on the products procured. It was also found that there are differences in the level of obligation demanded in different countries.

A review that was made of the existing functional accessibility requirements used for public procurement within Europe and in other countries showed that only a few steps have been taken to advance *e*Accessibility through public procurement. This review is reported in clause 6 with more detail given in annex D.

At an International level, the UN Convention on the Rights of Persons with Disabilities [i.156] advances measures that promote *e*Accessibility to information, communications and other services.

At an intra-European level, the Nordic Forum for Telecommunication and Disability provides guidelines and recommendations related to *e*Accessibility. International and European standardization bodies have been preparing standards and recommendations related to *e*Accessibility and these standards have been identified ([i.142], [i.143], [i.144], [i.145], [i.146], [i.147], [i.148], [i.149] and [i.150]).

Related information for each member state and EFTA country is detailed in annex D. In general, the main existing accessibility requirements in EU member States and EFTA countries refer to the Web accessibility of either existing or new public Web sites. There are some countries that mandate the accessibility of the Web sites of their public organizations. Others advance Web accessibility but not within any legal framework and a few have no particular evidence of Web accessibility.

There are two European countries (Italy and Spain) where the national law mandates accessible ICT procurement based on international, European and national standards. There are also two countries (Denmark and Ireland) that have developed public procurement toolkits that enable procurers to address accessibility requirements in their procurement procedures on a voluntary basis.

Outside Europe, in the USA, the requirements for accessibility are set out in the Code of Federal Regulations (in CFR 36, Part 1194). These are currently being reviewed and updated under the "Section 508 Refresh" and have been considered thoroughly in several clauses in the present document. Australian Commonwealth departments and agencies are required by the Disability Discrimination Act 1992 to ensure that online information and services are accessible by people with disabilities. Japan, products and services supplied to the government are required to have considered ICT accessibility based on a series of existing standards.

Exhaustive research was conducted into the large number of documents related to accessibility that have been or are being produced by international and regional Standards Development Organizations. This work is reported in clause 7. Some of these documents provided a valuable source of information on user needs related to particular disabilities. Unfortunately the functional requirements set out in many of the standards were exceedingly vague and commonly referred out to other documents which in their turn contained no testable requirements.

Over 100 documents dealing with accessibility related functions were identified in this study. This huge list of requirements and standards may be overwhelming for those working with specifications for procurement who also have many other aspects than accessibility to consider. It seems inevitable that some practical guidance is needed to pick those applicable standards best suited for reference in procurement documents. Some countries have introduced a toolkit for retrieval of requirements and standards for the application at stake. This approach seems to provide a practicable resolution for this task.

New ways to operate ICT are created continuously, and new ways will appear to fulfil user needs. New standards will therefore be needed to harmonize such new features, and they will have to be incorporated into tools for selecting requirements and standards. Thus any list of standards will have to be a living list with proper maintenance.

In order to determine what gaps existed in current accessibility requirements for ICT equipment, a study was first made of ISO/IEC PDTR 29138-1 [i.118] and of other documents such as the UN convention on the rights of persons with disabilities [i.156] to determine those needs of users with disabilities that required to be satisfied by such accessibility requirements. These user needs are set out in clause 8 and each need is mapped with an existing functional technical requirement for features and facilities of ICT products where it was found. This mapping was very valuable in identifying a significant number of apparent "gaps" between the needs of disabled users expressed in those documents and the technical requirements available to satisfy these needs.

This approach, by relating user needs to a product feature (for example, a display), was found to be the most effective way of dealing with the requirements as the user needs are similar for any product with that feature. This was more efficient than attempting to generate a listing of all possible CPV codes for products that might contain a display and associating the functional requirements for a display with each.