# Inclusive Procurement of Accessible Digital Books

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### Procurement context

As governments, employers and service providers we want to ensure everyone has the dignity of equal access to digital information and services.

This more than just nice idea, or smart business decision it is a requirement under both the [Disability Discrimination Act](https://www.legislation.gov.au/Details/C2018C00125) (DDA) and the [Disability Standards for Education](https://www.legislation.gov.au/Details/F2005L00767) (DSE). (The DSE clarifies our obligations under the DDA.)

● A person with a disability has a right to obtain goods and use services and facilities in the same way as people without a disability.

● An employer has a legal obligation to remove barriers that people with disabilities may face at work.

● Education providers have a legal obligation to give students with a disability the right to education and training opportunities on the same basis as students without disability.

To meet these legislative obligations and enable people with a disability to participate on the same basis, all digital information and services must possess the features and qualities that make it usable by all intended users from the start. Products that are capable of providing equal access of use are accessible products.

Whether we're building or buying digital information and services they must all be designed to provide equal access. In particular if we are procuring digital products then we must buy products that are fit for purpose. We don't buy cars that aren't designed to safety standards, so why would we buy digital books that aren't built to accessibility standards?

### How do we define, measure and procure accessible products?

The Australian ICT procurement Standard, [AS EN 301 549](https://www.standards.org.au/standards-catalogue/sa-snz/communication/it-040/as--en--301-dot-549-colon-2016) (EN301) sets out a consistent framework to clearly identify and include both the level of functional performance and accessibility requirements when procuring most types of ICT including digital books. EN301 uses existing international technical standards such as the World Wide Web Consortium's (W3C) technology neutral [Web Content Accessibility Guidelines](https://www.w3.org/WAI/standards-guidelines/) (WCAG 2.1) to define and measure accessibility as well as provide advice on techniques for achieving accessibility. The Australian Human Right Commission (AHRC) advises that digital products must achieve WCAG's Level AA Success Criteria to be deemed capable of providing equal access. At the time of writing, the current version of WCAG 2 is WCAG 2.1 which was published on 5 June 2018. WCAG 2.2 is scheduled to be published in mid to late 2021.

In practical terms, accessible products work seamlessly with the inbuilt accessibility features / assistive technologies found on mainstream devices such as Apple and Microsoft devices. These include screen magnifiers, screen readers, speech recognition tools, captioning, switch access and much more

To achieve our obligations, only request and procure digital books that meet the following technical requirements.

### General technical requirements

**1.** Designed to the [EPUB 3 standard](https://www.w3.org/publishing/epub3/epub-spec.html) as outlined by the Publishing@W3C's EPUB 3 Working Group.

2. Compliant with the [content conformance and discovery requirements](https://w3c.github.io/epub-specs/epub33/a11y/#sec-access-pub).

3. [Validated as meeting the above requirements](http://kb.daisy.org/publishing/docs/epub/validation/overview.html) using recommended processes and tools.

4. Compliant with WCAG 2.1 (Level AA) or above through providing the structure, technical functionality, and design to meet the following functional performance statements:

● Usage with no or limited vision

● Usage without perception of colour

● Usage without hearing

● Usage with limited hearing

● Usage with no or limited vocal capability

● Usage with limited manipulation or strength

● Usage with limited reach

● Minimise photosensitive seizure triggers

● Usage with limited cognition, language or learning

● Privacy

5. Works seamlessly with the inbuilt accessibility features / assistive technologies found on mainstream devices. Minimum compatibility: Android 11, iOS 14, iPadOS 14, macOS 11 or Windows 10 or above.