



How can procurement foster accessibility demands from consumers?

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- **ANEC in a nutshell**
 - **Role of public procurement**
 - **ANEC study on Declaring Conformance on Web Accessibility**
 - **Conclusions**

ANEC facts & figures



- Established in 1995 to represent national consumer organisations in the EU and EFTA countries
- Supported (co-funded) by the European Commission and EFTA, Consumer Organisations contribute 'in kind'
- Promotes, defends and represents the European consumer interest in:
 - *the development of standards*
 - *the use of standards (conformity assessment)*
 - *the development of legislation related to standards or their use*

With annual purchases of over 2 Trillion Euros, the public sector is the single biggest consumer market

“best value for money”= use public money to best fit the needs of the community

Public Procurement (cont.)



It is not only the price which is important but also the social and green considerations

Social considerations can be combined with green considerations in an integrated approach to sustainability in public procurement

ANEC calls for the use of public procurement to foster the accessibility of public buildings as well as ICT products and services

Declaring Conformance on Web Accessibility



M/376 provisions:

- Accessibility award criteria in public tenders**
- Verification of supplier claims of accessibility**
- Tracking of non-compliance of products and services with accessibility requirements in tenders**
- Information on the testing and conformity aspects**

Objectives:

- To specify about compliant accessible websites, how many self-declare their conformity and how many declare their conformity through an assessment by an independent third party**
- To specify about non-compliant websites, how many self-declare their conformity and how many declare their conformity through an assessment by an independent third party**
- To propose recommendations on which of the two web accessibility declaration models is the most appropriate one (if any) in order to ensure web accessibility**

- 100 websites claiming their web accessibility from government, public bodies and relevant commercial interest were selected
- All filtered through automatic testing for their web accessibility via SortSite
- The ones passed automatic testing (25 in total) were in addition manually tested against their web accessibility (5 main web pages per site)

- By country: From 5 European countries that third party certification was in place, i.e. UK, DE, NL, ES, IT
- From Directories of accessible websites provided by third party certification bodies, i.e. AENOR & TECHNOSITE (ES), BIK-BITV(DE), Pubbliaccesso(IT), Drempeelvrij(NL), See it Right & Shaw Trust (UK)
- From websites that had been already selected by MEAC (2007) study

Websites Selection (cont.)



- From websites self-declaring their accessibility and using the WCAG logos (identified through backlinking)
- By category: Distinction between Government and Commercial websites in the area of travel, entertainment and banking
- The final selection included an equal number of certified and self-declaring websites and based on a balanced selection between the countries
- Focus on public websites: final selection contained a higher proportion of government, local authority and public bodies (76) and just 24 of commercial organisations.

WCAG 2.0 (2008) mainly accessibility level A for the study

But apparently WCAG 1.0 (1999) is still the reference standard of most websites claiming web accessibility that were tested

Automatic Testing results



	Government and Public Body		Commercial	
Conformance claim	Certified	Self-declaration	Certified	Self-declaration
Pass automatic test to WCAG 2.0	0	3	0	0
10 or less test points failed	12	8	1	1
11-20 test points failed	15	12	5	5
21 or more test points failed	10	14	6	6

A: Fully accessible – this category was reserved for websites that passed all criteria at level A or with only a single minor failure instance

B: The website shows a real effort towards accessibility but not always implemented correctly

C: As B, the website shows real effort towards accessibility but up to 5 failure points at WCAG 2 level A

Ranking types for manually tested sites



D: The web-site shows limited accessibility features (e.g.: text resize widget and a "skip navigation" link on the page and add alt attributes to images), but fails to successfully implement multiple criteria at level WCAG 2 level A

E: The web-site does not show any evidence of accessibility awareness

Manual Testing Results



No. of sites	No. of criteria failed at level A	Category ranking		No. of sites	No. of criteria failed at level A	Category Ranking
Certified Government and public body				Self declared and public body		
2	0	A		1	2	B
1	1	A		2	4	B
1	2	B		1	5	C
2	4	B		2	4	C
1	4	C		1	5	D
2	5	C		2	6	D
2	6	D		1	7	D
1	7	D		1	8	D
Certified Commercial				Self declaration Commercial		
1	2	B		1	7	D

Main Findings



Only 3 websites (ranked A) out of the 76 certified by third parties were considered to be fully or almost fully accessible

0 websites out of the 24 that self-declaring their accessibility could be considered fully or almost fully accessible

More than 50% of the claimed accessible websites failed in success criteria on the provision of non-text alternatives (SC 1.1.1)

All manually tested accessible websites (25) show some evidence of accessibility awareness

Certification bodies and web developers should make a move towards WCAG 2.0 (2008) and drop WCAG 1.0(1999)

Certification bodies should ensure that the accessibility integrity of the approved websites is maintained also after certification

Website developers and owners should put in place a maintenance plan and retest to maintain accessibility

Recommendations (cont.)



Adding new multimedia elements and other “non-text” elements as well as their controls are addressed based on WCAG 2.0

W3C should have in place some quality control to assess whether the WCAG logo and links are misused since in the long term this will devalue its usefulness and credibility

Public authorities “biggest consumer”

Declaration of conformity key for effective public procurement

Lack of awareness/understanding about web accessibility

Problems of reliability of claims about web accessibility

Voluntary labels need market surveillance

Link between web accessibility and national legislation in absence of EU provisions

