BBC Technology Accessibility Policy

A Guide to Accessibility Requirements to be met by Vendors

Effective from: 31/03/2022

Policy owner: BBC Technology Group

Owner's department: BBC Chief Operating Group

Contact details for queries:

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Version control: v1.1.3

'One minute' policy summary

Purpose & Scope:

The policy identifies a minimum level for accessibility to ensure that the technology estate, including digital products, services and hardware are accessible and interoperable with the assistive technologies deployed by the BBC. It also outlines where exceptions to this policy might be applied and the process to follow in order to obtain appropriate dispensation.

Target Audience:

- All staff and departments across the BBC and 3rd Party Vendors intending to supply Technology to the BBC.
- Vendors intending to supply the BBC with technology, including digital products, services, or hardware, intended for use by BBC staff.

Impact on risk:

There is currently no published standard or policy that defines what the BBC considers to be 'Accessible' in regards to its Technology estate. The provision of this policy will mitigate those risks associated with:

- **Procurement of Technology:** The policy mitigates the risk of introducing products that are not Accessible and/or do not work with the Assistive Technology tools commonly used by BBC Staff.
- **Legal Duty:** The BBC has a legal duty under the Equality Act 2010 or the Disability Discrimination Act 1995 (in Northern Ireland) to make reasonable adjustments and to provide auxiliary aids such as Assistive Technology.
- **Talent Diversity Strategy:** The BBC's target is to increase the percentage of BBC staff with disabilities to 12% by 2023.

Key points of this policy:

1. Technology procured by the BBC (including digital products and services) should meet the WCAG 2.1 AA accessibility requirements.
2. Hardware will be subject to Accessibility testing based on proposed implementations.
3. Exceptions to the policy should be requested through the Dispensation process, managed by the Assistive Technology team.

Who can I contact for assistance?

Name	E-mail
Assistive Technology Team	Assistive-technology-team@bbc.co.uk

Approval: BBC Chief Operating Group Committee on 02/02/2022
Approved by: Chief Technology Officer - BBC Technology Group 25/03/2022

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BBC Technology Accessibility Policy

1.0   Policy purpose and scope

1.1   Audience and purpose
This document is aimed at vendors who wish to supply the BBC with technology, including digital products, services, or hardware, intended for use by BBC staff.

1.2   The policy outlines:
- The legal obligations the BBC and external vendors must adhere to, in order to support people with disabilities.
- The required BBC accessibility standards for technology—including digital products, services, and hardware—utilised by BBC staff.

1.3   Accessibility, procurement, and inclusion
The BBC is committed to equality and inclusion for all. In doing so, it aims to provide leadership in the field of accessibility and aims to ensure people with disabilities are fully engaged in their day-to-day duties via the use of appropriate assistive technologies.

This policy is aimed at ensuring that technology—including digital products, services, and hardware—are interoperable with the assistive technologies deployed by the BBC; and that any technology—including digital products, services, and hardware—brought onto the BBC estate, comply with internationally recognised accessibility standards.

By 2023, the BBC's target is to increase the percentage of BBC staff with disabilities to 12%. Any technology—including digital products, services, and hardware—procured for use by BBC staff, should align with these aims.

1.4   BBC staff require accessibility compliance
We require, on behalf of any BBC staff member who has an access need and relies on:
a) an assistive technology from the BBC staff supported assistive technologies list, or
b) any accessibility feature or setting listed in the BBC staff core accessibility features and settings,
(Or any combination of the above) that the member of staff can complete standard tasks at a speed and with ease-of-use equivalent to a non-disabled user.

1.5 Accessibility Compliance is required for technology—including digital products, services, and hardware—

Technology such as digital products, services or hardware include but are not limited to:

- Web application software or mobile application and/or services.
- Desktop applications.
- A Web or digital user interface which is a component of a wider service or product.
- Training materials or guides accompanying a product or service.
- Digital documents such as MS Office or PDFs.
- Digital communications channels including emails.
- AT Hardware (e.g. Braille Devices)

2.0 Terms and definitions

WCAG 2.1 is based on four design principles:
1. **Perceivable**
2. **Operable**
3. **Understandable**
4. **Robust**

By focusing on principles, not technology, they emphasise the need to think about the different ways that people interact with content: for example, users might:

a) use a keyboard instead of a mouse
b) change browser settings to make content easier to read
c) use a screen reader to 'read' (speak) content out loud
d) use a screen magnifier to enlarge part or all of a screen
e) use voice commands to navigate a website

2.1 <u>Perceivable</u>

Perceivability means the user can identify content and interface elements by means of the senses. For many users, this means perceiving a system primarily visually, while for others, perceivability may be a matter of sound or touch. New and emerging technologies may include sensory cues for smell and taste; these would also be considered examples of "perceivable" technology.

2.2 Operable

Operability means that a user can successfully use controls, buttons, navigation, and other necessary interactive elements. For many users, this means identifying an interface control visually, and then clicking, tapping, or swiping. For other users, using a computer keyboard or voice commands may be the only means by which they can operate and control the interface.

2.3 Understandable

Understandable technology is consistent in its presentation and format, predictable in its design and usage patterns, concise, multimodal, and appropriate to the audience in its voice and tone. Users should be able to comprehend the content and learn and remember how to use the interface.

2.4 Robust

Robust refers to standards-compliant and designed to function on all appropriate technologies. Users should be able to choose the technology they use to interact with websites, online documents, multimedia, and other information formats.

3.0 Roles and responsibilities

3.1 The Assistive Technology (AT) Team

The Assistive Technology (AT) team is responsible for ensuring that technology—including digital products, services, or hardware— are interoperable with the assistive technologies deployed by the BBC. The AT team assesses the risk of non-compliance against this Policy for technology products, services or hardware and is subsequently responsible for approving and issuing any Exceptions to Policy (EtP) It is the responsibility of the appropriate manager or risk owner to ensure compliance with all and any other policies relating to the procurement of technology, including digital products, services, or hardware on behalf of the BBC.

4.0   Processes relevant to managing the risk

4.1   BBC staff – supported assistive technologies list

This list includes assistive technologies used by BBC staff which can be used as a minimal benchmark during the procurement process. i.e. Does the application work as expected in conjunction with the Assistive technology software below?

Please note that this list may not include the full scope of assistive technologies and devices used by BBC staff. Hardware will be subject to Accessibility Testing based on proposed implementations.

OS	Windows 10		Mac OS		IOS
Client type	Web app	Software	Web app	Software	App
JAWS 2021 screen reader software	Yes	Yes	No	No	No
ZoomText 2021 Screen Magnifier software	Yes	Yes	No	No	No
Fusion 2021	Yes	Yes	No	No	No
IOS in-built accessibility features	No	No	No	No	Yes
Mac OS inbuilt accessibility features	No	No	Yes	Yes	No
Dragon Speech recognition 15.3	Yes	Yes	No	No	No

4.2   BBC staff baseline assistive technologies list

While adhering to international standards (WCAG 2.1 level AA) and self-testing with the baseline of assistive technologies, features and settings is a solid foundation, the BBC can't guarantee that additional issues won't be identified by the BBC Assistive Technology team, as a result of testing against the BBC build.

The BBC Assistive Technology team will liaise with external vendors for any accessibility issues identified, as a result of testing against the BBC build.

Please note, there are differences between Mac OS assistive technologies and Windows which could mean some issues are not identified, if not tested against both operating systems.

4.3　BBC staff core accessibility features and settings

Testing using assistive technologies will identify many accessibility issues. However, they do not represent the full list of accessibility heuristics required to ensure a user interface is accessible. Please refer to international standards (WCAG 2.1 level AA) for a full description of the requirements to be met.

5.0　Details of Key Controls and requirements to be implemented

5.1　Legal Requirements

To promote equality and inclusion for all and to comply with our legal obligations, all technology—including digital products, services, or hardware—procured for use by our staff must meet certain accessibility standards as a minimum.

As an employer the BBC has a legal duty under the Equality Act 2010 or the Disability Discrimination Act 1995 (in Northern Ireland), not to discriminate against people with disabilities. This includes a duty to make reasonable adjustments to physical features and to provide auxiliary aids to counter any disadvantage that a person would otherwise experience by reason of their disability.

5.2　Standards and user requirements

All technology—including digital products, services, and hardware—for use by BBC staff should achieve WCAG 2.1 level AA compliance throughout the life cycle of the product or duration of the contract. Hardware will be subject to accessibility testing by the BBC, based on proposed implementations.

These are general standards. Compliance with international standards (WCAG 2.1 level AA), self-testing and the baseline of assistive technologies, features and settings is a solid foundation, but the BBC may identify additional issues as a result of testing against the BBC build and require the vendor to address these. We may also require specific accessibility functions or features for particular implementations.

5.3　Expectation upon Vendors

External vendors looking to potentially work with the BBC will be required, in the first instance, to self-certify that they will meet the appropriate accessibility standards by the time the contract is awarded, and to demonstrate a capability to maintain this level of accessibility subsequently for the duration of the contract or the life cycle of the product. These may be the guideline requirements of WCAG 2.1 level AA or specific requirements notified by the BBC.

5.4   Upgrades, iterations, and replacements

Accessibility standards should improve or as a minimum be maintained as technology, including digital products, services or hardware are upgraded or replaced for the duration of the contract. Any accessibility failings resulting from an upgrade/update are the responsibility of the vendor to remediate in a timely fashion. The length of this remediation period, a maximum of 6 months from the date of the application upgrade/update, is to be agreed through a dispensation process with the BBC's Assistive Technology Team.

6.0   Internal/external links that may be relevant to managing the risk

Delivering Accessibility and accessible products, goes beyond Assistive Technology (AT) – it requires a holistic and personal approach to delivering technology—including digital products, services, or hardware—to the user, in a way most suited to their individual needs.

6.1   Find out more

- VPAT 2.4 Accessibility Conformance Report (WCAG edition Feb 2022)
- How to design for accessibility
- BBC Megapedia: A Table of Universal Shortcuts
- Guidance for developers building accessible websites
- BBC User Experience and Design
- Diversity and inclusion strategy and reports.

7.0   Training requirements

The BBC Assistive Technology team is available to give guidance and support.

8.0 Exceptions to Policy (EtP) process

Any exceptions to this policy must be obtained from the Assistive Technology Team. Without a BBC Assistive Technology ID being issued, a dispensation is not considered as approved.

8.1 Exceptions Process

Requests for dispensation must be submitted to the BBC Assistive Technology team, who will review the business justification, assess the risk, and advise on any action to be taken before issuing any recommendations. Once the BBC Assistive Technology team receives confirmation that the risk has been signed off by the risk-owner, a BBC Assistive Technology dispensation ID will be assigned.

8.2 Changes or extensions

Any changes or extensions to the original dispensation request must be reported to the BBC Assistive Technology team so that the request can be reassessed.

9.0 Document Control

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