NHS
Cornwall and
Isles of Scilly

Freedom of Information Act 2000
NHS Cornwall and Isles of Scilly Integrated Care Board's response to information request

Date request received: 10 September 2026
FOI ref: 108460
Date response sent: 08 October 2026

Requested information

I am writing to request information under the Freedom of Information Act 2000 concerning how the NHS Cornwall & Isles of Scilly ICB addresses digital accessibility when commissioning and procuring digital services, systems and products.

For this request, "digital services, systems and products" includes patient-facing and staff-facing websites, applications, portals, online forms, digital platforms and software commissioned or procured by, or on behalf of, the ICB.

Please provide the following information about the ICB's current arrangements as at the date of this request.

Where your team handles requests for more than one ICB, please provide a response specifically for the NHS Cornwall & Isles of Scilly ICB. If arrangements differ between predecessor organisations following a merger, please identify which arrangements apply to which areas, using existing recorded information.

1. Policy and governance
Does the ICB hold a policy, standard, framework, guidance or other documented requirement concerning digital accessibility within commissioning or procurement?
If yes, please provide a copy or link to the relevant document(s).

2. Procurement specifications
Does the ICB's current procurement documentation require accessibility requirements to be included when procuring digital services, systems or products?
Please provide any standard wording, specification, template or guidance used to describe these requirements.

3. Accessibility standards
Please identify the accessibility standards specified in the ICB's current procurement requirements, for example WCAG 2.2 AA or another accessibility standard.

4. Bidder evidence

What evidence do the ICB's procurement requirements ask suppliers to provide to demonstrate that their proposed digital product or service meets accessibility requirements? Please provide any standard questions, evidence requirements or guidance used.

5. Evaluation of tenders

Please provide any current guidance or evaluation templates showing whether accessibility is:
a) a mandatory/pass-fail requirement;
b) a scored criterion;
c) considered within another evaluation criterion; or
d) not routinely evaluated.
Where a standard accessibility weighting or scoring methodology exists, please provide it.

6. Accessibility testing and disabled-user involvement

Do the ICB's documented requirements specify any of the following as part of procurement, implementation or acceptance of digital products or services?
a) Automated accessibility testing.
b) Expert/manual accessibility testing.
c) Testing by disabled people and/or users of assistive technologies.
d) An independent accessibility audit.
Please indicate which apply and provide the relevant guidance or requirements, where held.

7. Contractual requirements

Does the ICB include accessibility requirements, key performance indicators, contractual clauses or other ongoing accessibility obligations within contracts for digital services or products?
If yes, please provide the standard wording or template currently used.

8. Pre-go-live and acceptance assurance

Before a newly commissioned or procured digital service or product goes live, do the ICB's documented processes require evidence that agreed accessibility requirements have been met?
If yes, please provide the relevant process or evidence requirements.

9. Ongoing supplier assurance

Does the ICB have a documented process for monitoring or seeking assurance that commissioned digital services continue to meet accessibility requirements after implementation?
If yes, please provide the relevant process, framework or standard reporting requirement.

10. Responsibility

Please provide the job title or team/function recorded as responsible for:
a) Setting digital accessibility requirements.
b) Ensuring accessibility is addressed during procurement.
c) Monitoring accessibility of commissioned digital services.
Individual staff names are not required.

11. Supplier non-compliance

Does the ICB have a documented process for addressing circumstances where a commissioned digital service or product does not meet the accessibility requirements specified in the contract?
If yes, please provide the relevant policy, process or contractual provision.

12. Assessment or audit
During the period from 1 April 2025 to the date of this request, has the ICB undertaken, commissioned or received any organisation-wide review, audit or assessment of how effectively accessibility is incorporated into its digital commissioning or procurement arrangements?
If yes, please provide the resulting report, findings, recommendations or action plan. For a recently merged ICB, please include relevant predecessor-organisation reports held by the current ICB and identify the organisation covered.

I am seeking existing recorded information only. I do not require new analysis, a review of individual procurement exercises or a newly calculated estimate of how frequently a practice occurs.

Where information is not held, please state this against the relevant question. Where a document answers several questions, please provide it once and identify the questions it addresses.

If the information is already publicly available, please provide a direct link to the relevant document or page.

If any part of this request would exceed the appropriate cost limit, please advise which elements cause the difficulty and how the request could be narrowed to fall within the limit.

Response

Questions 1 to 11

The ICB's procurement of digital services, systems and products is generally undertaken through established public sector procurement frameworks, principally those managed by the Government Commercial Agency (GCA), formally the Crown Commercial Service, these frameworks incorporate applicable legislative, regulatory and policy requirements relating to public procurement, including accessibility, equality and digital standards.

Where digital procurements are undertaken through the Government Commercial Agency or other nationally approved frameworks, the ICB relies on the framework documentation, terms and conditions, supplier selection requirements and governance arrangements established by the relevant framework authority.

The ICB does not hold separate, locally developed policies, standards, evaluation methodologies, contractual clauses, guidance documents or assurance processes that relate solely to digital accessibility within procurement activities.

The requester may wish to refer to information published by the Government Commercial Agency and other relevant public procurement bodies.
https://www.gca.gov.uk/

Information relating to accessibility requirements for public sector websites and mobile applications is available at:

https://www.gov.uk/guidance/accessibility-requirements-for-public-sector-websites-and-apps

Question 12

The ICB does not hold any recorded information identifying an organisation-wide review, audit, assessment or similar exercise undertaken, commissioned, received or completed between 1 April 2025 and the date of this request specifically concerning the incorporation of accessibility requirements within the ICB's digital commissioning or procurement arrangements.

Attachment(s)

None