FOINHSD26/1912

NHS Devon
Aperture House
Pynes Hill
Rydon Lane
Exeter
EX2 5AZ

d-icb.foi@nhs.net

Tel: 01392 205205

Dear,

Re: Request for information under Freedom of Information Act 2000

Thank you for your request under the Freedom of Information Act 2000.

NHS Devon Integrated Care Board (ICB) is confirming in accordance with Section - (1) (a) of the Act, whether it holds the information requested and (b) is supplying it unless otherwise specified.

NHS Devon can confirm it holds part of the requested information.

You requested the following information.

> **I am writing to request information under the Freedom of Information Act 2000 concerning how the NHS Devon ICB addresses digital accessibility when commissioning and procuring digital services, systems and products.**
>
> **This request forms part of research into how digital accessibility is embedded in NHS commissioning and procurement.**
>
> **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 Devon 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).

The Procurement Policy does not require this, although this will be considered at the next review (2027).

When procuring any digital health technology, we follow the NHS Digital Technology Assessment Criteria (DTAC) guidance for buyers and suppliers.

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.

There is no standard wording, it is dealt with on a case-by-case basis but for any digital health technology, we follow the NHS Digital Technology Assessment Criteria (DTAC) guidance for buyers and suppliers.

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.

There are no local requirements outside of national requirements for all cases, but for any digital health technology, we follow the NHS Digital Technology Assessment Criteria (DTAC) guidance for buyers and suppliers.

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.

Individually assessed.

5. Evaluation of tenders

Individually assessed.

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

Individually assessed.

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

Individually assessed.

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

Individually assessed.

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

Individually assessed.

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.

Peter Collins, Chief Population Health Officer.

b) Ensuring accessibility is addressed during procurement.

Individually assessed.

c) Monitoring accessibility of commissioned digital services. Individual staff names are not required.

Individually assessed.

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.

No specific local policy, GC9 of the standard contract used.

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?

None undertaken regarding procurement.

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.

Satisfaction

We trust this matter has been dealt with to your satisfaction but if there is anything you need clarifying, please do not hesitate to contact the office on 01392 205205 or emailing d-icb.foi@nhs.net Please remember to quote the reference number at the top of this letter in any future communications.

If you are unhappy with the service you have received in relation to your request and wish to request a review of our decision or make a complaint, you can write to the office and arrangements will be made for an independent review. You can write directly to the NHS Devon Chief Executive Officer if you prefer using the "contact us" details displayed on the NHS Devon website.

If you remain dissatisfied with the outcome of the independent review, you have the right to appeal again to the Information Commissioner at:
Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
Tel: 01625 545 700
Fax: 01625 524 510

Yours sincerely,

The Freedom of Information Office
NHS Devon Integrated Care Board