

# **Accessibility in procurement: Ensuring accessibility for people with disability guide**

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Version	Date	Comments
v1.0	September 2019	Published
v1.1	July 2025	Minor updates made – highlights: <ul style="list-style-type: none"> <li>• DHPW corporate branding</li> <li>• Machinery-of-government changes</li> <li>• Hyperlinks verified and updated or removed</li> <li>• Document date updated</li> <li>• New version history log and 'Administration' section added</li> <li>• Document title</li> <li>• Removed contextual policy information</li> </ul>
v2.0	May 2026	Updates made – highlights: <ul style="list-style-type: none"> <li>• Alignment with <i>Queensland Procurement Policy 2026</i></li> <li>• Improved clarity, reduced duplication and accounting for agency-specific procurement practices and better practice</li> <li>• Document title</li> </ul>

**The State of Queensland (Department of Housing and Public Works) 2026.**

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We are committed to continuous improvement. If you have any suggestions about how we can improve this document, or if you have any questions, contact us at [betterprocurement@hpw.qld.gov.au](mailto:betterprocurement@hpw.qld.gov.au).

**Disclaimer**

This document is intended as a guide only for the internal use and benefit of government agencies. It may not be relied on by any other party. It should be read in conjunction with the Queensland Procurement Policy, your agency's procurement policies and procedures, and any other relevant documents.

The Department of Housing and Public Works disclaims all liability that may arise from the use of this document. This document should not be used as a substitute for obtaining appropriate probity and legal advice as may be required. In preparing this document, reasonable efforts have been made to use accurate and current information. It should be noted that information may have changed since the publication of this document. Where errors or inaccuracies are brought to attention a reasonable effort will be made to correct them.

**Administration**

Version 2.0 of this document replaces all previous versions of this document and takes effect immediately.

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## Purpose

This guide aims to support Queensland Government buyers to incorporate accessibility considerations in procurement.

## How to use this guide

Read this guide with your agency's procurement policies and procedures, whole-of-government procurement guides, the [Queensland Procurement Policy 2026](#) (QPP 2026), the [Disability Discrimination Act 1992 \(Cth\)](#) (DDA), the [Disability Standards and Guidelines](#), the [Disability Services Act 2006](#) (DSA) and the [Anti-Discrimination Act 1991](#) (ADA).

This guide is intended to provide general guidance that is applicable to all categories of goods and/or services, acknowledging there may be procedural nuances specific to categories and agencies. It will flag key steps and considerations related to ensuring accessibility in government procurement activities and reference other procurement guidance materials where necessary.

## Introduction

Australia's legislative and policy frameworks supports the inclusion of people with disability and provides legal protections against discrimination on the basis of their disability. The DDA makes it unlawful to discriminate against a person, in many areas of public life, including employment, education, getting or using services, renting or buying a house or unit, and accessing public places, because of their disability.

### Important

Refer to section 4(1) of the DDA for the definition of 'disability'.

The DDA is supported by the *Disability Standards and Guidelines*. These are legally binding regulations and non-binding guidelines covering access to buildings, education, public transport, digital goods and services, and insurance.

In Queensland, this is also supported by the DSA which acknowledges the rights of people with a disability, including by promoting their inclusion in the life of the community. The DSA sets the requirement for every Queensland Government department to develop a disability service plan.

The ADA also applies to Queensland. It covers a broad range of protected attributes, including impairment in various areas of activity, to eliminate discrimination and enable inclusion.

## Disability discrimination

The DDA stipulates that a person ('the discriminator') discriminates against a person with a disability if:

- **Direct Discrimination** - the discriminator proposes to:
  - treat that person less favourably than a person without the disability or
  - not make reasonable adjustments for the person, with the effect that the person is treated less favourably than they would have been treated without the disability;
 (e.g. in the selection of particular suppliers for the provision of goods or services).
- **Indirect Discrimination** - the discriminator proposes to require the person to comply with a requirement or a condition which, because of the person's disability, the person:
  - is not able to comply; or
  - is only able to comply if reasonable adjustments are made but the discriminator proposes not to do so;
 and this has the likely effect of disadvantaging that person.
 

(e.g. accessing buildings, public transport, housing accommodation or health and hospital services).

Under the DDA, direct or indirect discrimination can also occur against a person who has an associate with a disability (a spouse, relative, carer or person in a business, sporting or recreational relationship with a person with a disability).

## Commitment to ensuring accessibility in procurement

In response to the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability ([Disability Royal Commission](#)), the Queensland Government has committed to consider procurement policies that encourage inclusive employment practices in the private sector, building on existing procurement strategies and policies.

The QPP 2026 recognises that improving accessibility in procurement contributes to promoting a more inclusive and efficient procurement environment. Ensuring accessibility in procurement benefits not just people with disability, but other marginalised and disadvantaged segments of the community, supporting greater diversity and inclusivity.

Buyers are encouraged to move beyond mere compliance with accessibility requirements and focus on the broader benefits of incorporating inclusive action throughout the procurement process.

For both government and industry, ensuring compliance with relevant legislation in any procurement enables better outcomes, including minimising exposure to reputational and delivery risk.

Applying accessibility considerations to procurement is about ensuring that goods and/or services are sourced in an accessible manner, and are available for use by others in a way that maximises accessibility. It is about advancing the interests/improve outcomes for people with disability in line with Queensland's commitments under, for example, [Australia's Disability Strategy 2021-31](#).

## Process summary

Applying accessibility considerations should be tailored based on the objective, risk, value and complexity of the procurement. Having regard to this, **Table 1** below provides a general process summary of the key steps to incorporate accessibility considerations in procurement and may be adapted to your agency's specific processes. Further detail on each step is included in the following pages.

**Table 1:** Incorporating accessibility considerations in procurement - process summary

No.	Step	QPP 2026 Reference
1	Familiarise yourself with the seven design principles to help guide decisions around whether a product, service or environment is universally accessible: <ol style="list-style-type: none"> <li>1. Equitable use</li> <li>2. Flexibility in use</li> <li>3. Simple and intuitive use</li> <li>4. Perceptible information</li> <li>5. Tolerance for error</li> <li>6. Low physical effort</li> <li>7. Size and space for approach and use</li> </ol>	Pillars 1 and 5
2	<b>Agency obligations</b> Consider policies and procedures that encourage robust processes, capability uplift and situational awareness	Rules 6, 30, 34, 40, 43
3	<b>Individual procurement obligations</b>	
3.1	<b>Procurement planning</b> <ul style="list-style-type: none"> <li>• Ensure accessibility is a procurement objective</li> <li>• Consider the <a href="#">Queensland Disability Stakeholder Engagement and Co-design Strategy</a> (SEC Strategy)</li> <li>• Plan the level of participation, timing and frequency of engagement with the disability sector to enable the sector to inform and/or co-design all stages of the procurement lifecycle</li> <li>• Identify capable and competitive:                             <ul style="list-style-type: none"> <li>○ <a href="#">Australian Disability Enterprises</a> (ADEs)</li> <li>○ Disability-owned businesses and social enterprises that specialise in accessible and inclusive goods and/or services</li> </ul> </li> <li>• Consider using flexible procurement techniques</li> <li>• Include accessibility as part of risk assessment</li> </ul>	Rules 1 - 6, 10, 18, 20, 34
3.2	<b>Go to market</b> <ul style="list-style-type: none"> <li>• Develop specifications which are compliant with relevant legislation and disability standards</li> <li>• Include a mandatory evaluation criterion requiring offerors to warrant compliance with the <a href="#">Queensland Government Supplier Code of Conduct</a> (Code), including the DDA and <a href="#">Disability Standards and Guidelines</a></li> <li>• Request offerors to demonstrate compliance with requirements under relevant legislation, how equitable access will be achieved and/or how minimum standards have been exceeded to achieve greater accessibility</li> <li>• Make invitation documents available in an accessible format (e.g. compliance with <a href="#">Web Content Accessibility Guidelines 2.1</a> and the <a href="#">Digital Service Standard</a>)</li> </ul>	Rules 9, 16, 20

3.3	<b>Evaluation and award</b> <ul style="list-style-type: none"> <li>Outline how accessibility requirements will be evaluated</li> <li>Include a person/s with disability during the evaluation process to enable offers to be evaluated for accessibility compliance</li> <li>Include in the evaluation report information on how the goods and/or services will be accessible and advance the interests/improve outcomes for people with disability</li> <li>Capture all relevant commitments made by the offeror with regards to the Code, noting the contract must include a condition requiring ongoing compliance with the Code during the contract term and which outlines that a breach of the Code is a breach of the contract</li> <li>Clearly communicate to the successful offeror how the contract will be managed</li> </ul>	Rules 22, 24
3.4	<b>Contract management</b> <ul style="list-style-type: none"> <li>Manage the contract in line with the approved contract management plan, including taking appropriate remedial action where non-compliance with accessibility requirements is identified</li> <li>Verify accessibility compliance (or equitable access) has been obtained before accepting any good and/or service</li> </ul>	Rules 31, 32

## Incorporating accessibility considerations in procurement

### 1. Accessibility principles

Seven design principles help to guide decisions around whether a product, service or environment is universally accessible.

The [United Nations Convention on the Rights of Persons with Disabilities and Optional Protocol](#) defines ‘universal design’ as ‘the design of products, environments, programmes and services to be usable by all people, to the greatest extent possible, without the need for adaptation or specialised design’ and it ‘shall not exclude assistive devices for particular groups of persons with disabilities where this is needed.’

Incorporating these principles into agency service delivery, including procurement, will increase the accessibility for people with disability:

1. Equitable use – is useful and marketable to people of all abilities (e.g. public transport)
2. Flexibility in use – accommodates a wide range of individual preferences and abilities (e.g. office desks)
3. Simple and intuitive use – is easy to understand, regardless of the user’s experience, knowledge, language skills, or current concentration level (e.g. visual vs written, plain English, multiple languages)
4. Perceptible information – communicates necessary information effectively to the user, regardless of ambient conditions or the user’s sensory abilities (e.g. signage, website colour contrasts)
5. Tolerance for error – minimises hazards and adverse consequences of accidental or unintended actions (e.g. flooring)
6. Low physical effort – can be used efficiently and comfortably and with a minimum of fatigue (e.g. multi-latch, heavy doors)
7. Size and space for approach and use – appropriate size and space is provided for approach, reach, manipulation, and use regardless of user’s body size, posture, or mobility (e.g. building doorways, public toilets, libraries).

#### Note

The IDEA Center at the University at Buffalo have developed eight goals of universal design, building on the seven design principles, to help users to apply universal design and measure outcomes.

The eight goals of universal design cover functional, social and emotional dimensions:

1. Body fit: Accommodating a wide range of body sizes and abilities.
2. Comfort: Keeping demands within desirable limits of body function and perception.
3. Awareness: Ensuring that critical information for use is easily perceived.

4. Understanding: Making methods of operation and use intuitive, clear and unambiguous.
5. Wellness: Contributing to health promotion, avoidance of disease, and protection from hazards.
6. Social integration: Treating all groups with dignity and respect.
7. Personalization: Incorporating opportunities for choice and the expression of individual preferences.
8. Cultural appropriateness: Respecting and reinforcing cultural values, and the social and environmental contexts of any design project.

The implications of the eight goals of universal design will be considered in a future review of this guide.

## 2. Agency obligations

Accessibility in procurement may require a combination of the following three key attributes that should be considered by your agency:

1. Robust process – delivers good procurement practice which meets accessibility requirements, maintains probity, transparency and integrity of decision making and enables quality engagements with relevant stakeholders. This includes the provision of targeted debriefing to unsuccessful suppliers.
2. Maturing capability – delivers access to available training and resources to develop procurement capability and professionalise the workforce.
3. Situational awareness – delivers understanding of responsibilities under the DDA and *Disability Standards and Guidelines*, to achieve fully accessible government services. Embedding accessibility requirements within invitation and contract documentation promotes awareness of the government's commitment to ensuring accessibility, and provides a contractual mechanism to support compliance.

## 3. Individual procurement obligations

Refer to [Appendix 1](#) for examples on applying accessibility considerations to individual procurement activities.

### 3.1 Procurement planning

- Ensure accessibility is an objective of the procurement, referring to relevant legislation (e.g. DDA, DSA) and any applicable standards (e.g. *Disability Standards and Guidelines*).
- Consider the SEC Strategy, which is supporting and guiding consultation and co-design with the disability community.
- Plan the level of participation, timing and frequency of engagement with the disability sector. Consider:
  - consulting with [category lead agencies](#), including seeking further advice from the respective category council on early engagement with the disability sector, or formation of a small working group which includes representatives from the disability sector, to inform and/or co-design all stages of the procurement lifecycle (e.g. consulting with accessibility experts and conducting user testing to ensure compliance with [Web Content Accessibility Guidelines \(WCAG\) 2.1](#) and the [Digital Service Standard](#) when procuring IT systems)
  - the [Queensland Government Accessible Events Guide](#) which has been developed to provide a greater understanding of design principles for accessible events, as well as practical measures that can be implemented when planning and executing events
  - the [Accessible communication ForGov webpage](#) which contains a range of useful information on what accessible communication can look like.
- If further disability sector input is sought, several strategies and organisations exist to support individuals, systems and legal advocacy.<sup>1</sup> The capacity of these organisations can be limited and consultation services may attract a fee, which should be factored as part of planning:
  - [Good Practice Guidelines for Engaging with People with Disability](#)
  - [Funded disability peak](#)
  - [Advocacy organisations](#)

<sup>1</sup> Please note, this is not an exhaustive list of all the information or organisations that may be available to provide further consultation or for engaging specialist advice or training. Queensland Government Procurement does not endorse or take responsibility for the information contained on the organisation's websites.

- As part of supply market analysis, identify any interested, capable and competitive ADEs (e.g. through the [BuyAbility Social Enterprise Directory](#)), and disability-owned businesses and social enterprises that specialise in accessible and inclusive goods and/or services.
- Consider using flexible procurement techniques (e.g. set-asides) to increase opportunities for diverse suppliers to participate in the procurement.
- Include accessibility as part of the risk assessment process – identify any mitigation measures that may be needed (e.g. multiple touch points with the sector by engaging early, initial planning, evaluation of tenders, product testing phase).

### Important

The [Australian Human Rights Commission](#) (AHRC) may grant temporary exemption (up to 5 years) for some aspects of the DDA. Any exemptions would not be granted for new products or services and are subject to rigorous conditions as prescribed by the AHRC. Guidelines on how to apply for an exemption are available on the [AHRC website](#), however exemption should not be considered a preferable or alternative option in lieu of appropriate planning and consultation.

The [Queensland Human Rights Commission](#) (QHRC) provides a process for organisations or individuals to apply for an exemption from certain provisions of the ADA. This allows them to undertake activities that might otherwise be considered discriminatory, provided the exemption is deemed reasonable and justified. For more information on these exemptions, refer to the [Exemptions under discrimination law webpage](#) of the QHRC.

## 3.2 Go to market

In developing invitation documentation:

- subject to the objective, value, risk and complexity of the procurement, ensure specifications are:
  - based on, and complies with, relevant legislation and disability standards and clearly articulate how accessibility has been considered
  - consulted with the disability sector as applicable with user-testing signed off as compliant with the applicable legislation including the DDA, the *Disability Standards and Guidelines*, and the DSA
- include a mandatory evaluation criterion requiring offerors to warrant that they comply with the Code, including the DDA and *Disability Standards and Guidelines*
- for significant procurement, apply a purposeful public procurement evaluation criterion, and depending on the outcomes pursued as part of the procurement strategy, encouraging inclusive employment practices in the private sector to support people with disability as a purposeful public procurement outcome
- request offerors to provide either a demonstration of compliance with requirements under relevant legislation or a demonstration of how equitable access will be achieved (where applicable) (e.g. demonstrating use of universal design, DDA and *Disability Standards and Guidelines* compliance have been met, aligning activities with the [Guidelines for the targeted recruitment of people with disability](#), additional accessibility measures, third-party accreditation)
- request offerors to demonstrate how minimum standards have been exceeded to achieve greater accessibility (e.g. records of user-testing prototypes). Exceeding minimum standards should be encouraged to practically and realistically meet the need of people with disability
- ensure this is made available in an accessible format (e.g. compliance with [WCAG 2.1](#) and the [Digital Service Standard](#)) to ensure all people with disability, or businesses that employ people with disability, can participate in the procurement.

## 3.3 Evaluation and award

In evaluating offers, consider:

- outlining how accessibility requirements will be evaluated, including how alternative solutions which provide equitable access will be evaluated (e.g. records of disability consultation by offerors)
- including a person/s with disability to enable offers to be evaluated for accessibility compliance.

The evaluation report should specifically include information on an assessment of how the procured goods and/or services will be accessible to people with disability and advance the interests/improve outcomes for people with disability in line with:

- Queensland's commitments under, for example, *Australia's Disability Strategy 2021-31*, and

- relevant legislation (e.g. DDA or DSA), standards and guidelines (e.g. *Disability Standards and Guidelines*).

The resulting contract is to capture all relevant commitments made by the offeror with regards to the Code, including any monitoring (e.g. key performance indicators) and reporting obligations. The contract must include a condition requiring ongoing compliance with the Code during the contract term and which outlines that a breach of the Code is a breach of the contract.

Buyers should clearly communicate to the successful offeror how the contract, including any monitoring and reporting obligations, will be managed throughout the life of the contract.

### 3.4 Contract management

- Proactively manage the contract in line with the approved contract management plan. Refer to the [Contract management guide](#) for further information on contract management.
- Where non-compliance with accessibility requirements is identified as part of contract delivery, buyers are to manage this as part of contract management, taking appropriate remedial action as required.
- Verify compliance (or equitable access) has been obtained before accepting any good and/or service delivered under the contract.

## Complaints regarding disability discrimination

Procurement-related complaints should, in the first instance, be managed in accordance with relevant agency processes with reference to the [Complaints management guide](#). Agencies should determine the appropriate pathway based on the complaint's source, issues raised, and any relevant sensitivities.

For suppliers and the community, several mechanisms exist to investigate and respond to complaints regarding disability discrimination as a result of a procurement process:

- Procuring agency – raising, and resolving, a complaint with the buyer in the first instance.
- [QHRC](#) – raising a complaint with the QHRC, being an independent body, which will attempt to resolve complaints through a dispute resolution process, noting it does not have the power to decide if unlawful discrimination or other conduct has occurred.
- [Queensland Civil and Administrative Tribunal \(QCAT\)](#) – where no agreement is reached and further negotiations are unable to resolve the complaint, the complainant has the option to escalate the complaint for a public hearing with the QCAT, where any determination made is binding on all parties.
- [AHRC](#) – raising a complaint with the AHRC, being an independent third party which investigates complaints about discrimination and human rights breaches, which will attempt to resolve complaints through a conciliation process. Examples of non-compliance complaints with the DDA and other human rights issues investigated by the AHRC are outlined in [Appendix 2](#).

## Further information and support

- [Australian Disability Network](#) – Provides information to assist with applying accessible procurement practices.
- [Australian Government Department of Health, Disability and Ageing](#) – Provides information on disability advocacy, including the National Standards for Disability Services (noting this is not covered under the DDA).
- [AHRC](#) – Issues guidance and advice to assist persons and organisations with responsibilities under the DDA to avoid discrimination and meet their responsibilities, including providing information on relevant Australian Standards (e.g. [AS EN 301 549:2024](#) for ICT Products and Services).
- [Disability Awareness, Understanding Disability Discrimination in Business](#) and [About Universal Design](#) – Free resources to assist with establishing a foundation of knowledge that will support an accessibility compliant procurement process.
- [Disability services](#) – Read about the Queensland Government's role in supporting people with disability, their families and carers.
- [Queenslanders with Disability Network](#) – Supports and advocates for people with disability across Queensland.
- [Skills2Procure](#) - Suite of training and development options for Queensland Government buyers to build procurement capability, including ensuring accessibility compliance in procurement. For more information, email [Skills2Procure@hpw.qld.gov.au](mailto:Skills2Procure@hpw.qld.gov.au).

## Appendix 1: Applying accessibility considerations to individual procurement activities

The following examples are intended to demonstrate how accessibility considerations are applied to individual procurement activities of varying risk. Please note:

- while other QPP 2026 requirements and considerations may apply, for the purposes of these examples they will not be addressed
- these examples have been developed with the assistance of generative AI tools
- these examples outline a generic procurement procedure which may or may not reflect your agency's procurement procedure.

### Example 1 - Significant procurement: Procuring diagnostic consumables

#### Scenario

A Queensland Government hospital seeks to establish a common-use supply arrangement for diagnostic consumables, including:

- pathology test kits (e.g. blood glucose strips, rapid antigen tests)
- specimen collection items (swabs, vials, lancets)
- reagents supplied with accompanying instructions.

Consumables may be:

- used directly by clinicians
- used by patients under supervision
- self-administered by patients in clinics or community settings.

#### Stage 1: Plan

As consumables are handled by people with diverse physical, sensory and cognitive abilities, accessibility is an important consideration linked to patient safety, equity of access and correct use. Accordingly, outline accessibility as one of the objectives of the procurement.

Ensure risk assessment, scoping and specifications development are informed by consultation with the Medical Goods and Services category lead and a relevant disability representative.

#### Identify accessibility-related risks:

- incorrect test results due to unreadable instructions or labelling
- exclusion of users with low vision, limited dexterity or cognitive impairment
- increased clinical error due to poorly differentiated components

#### Confirm accessibility scope covers:

- primary consumable items
- packaging and seals
- labels (expiry dates, batch information)
- instructions for use (IFUs), including diagrams and symbols

#### Develop specifications informed by accessibility principles:

1. **Equitable use** – Diagnostic consumables can be used by people with and without disability without the need for segregated or “special” versions.
2. **Flexibility in use** – Consumables accommodate a range of abilities (e.g. grip strength, vision, dexterity).
3. **Simple and intuitive use** – Packaging, labelling and instructions are easy to understand and follow.

4. **Perceptible information** – Instructions and critical information are perceivable by people with sensory impairments.
5. **Tolerance for error** – Design and instructions minimise incorrect use and support safe recovery.
6. **Low physical effort** – Consumables can be opened, held and used with minimal force or fine motor control.
7. **Appropriate size and space for use** – Consumables are sized and shaped to support safe handling by diverse users.

## Stage 2: Go to market

**Include any mandatory evaluation criteria** that suppliers must meet such as requiring offerors to warrant that they comply with the Queensland Government Supplier Code of Conduct, including the DDA and Disability Standards and Guidelines.

**Include desirable evaluation criteria and associated questions** to elicit responses from suppliers – these should be linked to the accessibility principles wherever possible and enable development of key performance indicators. A selection of these have been outlined in the table below as examples:

Accessibility principle	Evaluation criteria	Question for suppliers	Key performance indicator
Equitable use	The extent to which the supplier demonstrates that diagnostic consumables are designed and supplied for equitable use by all users, including people with disability, without reliance on segregated or inferior alternatives.	Describe how your diagnostic consumables can be used by people with and without disability without the need for segregated or “special” versions.	Percent of consumables supplied as standard products usable by all users.
Flexibility in use	The degree to which the supplier demonstrates flexibility in the use of consumables to accommodate varied user abilities and preferences.	Explain how your consumables accommodate a range of user abilities (e.g. grip strength, vision, dexterity), including any available design options or variations.	Availability of design features or options supporting diverse abilities.
Perceptible information	The effectiveness with which the supplier presents critical information in formats perceivable by users with diverse sensory abilities.	Describe how critical information (e.g. steps, warnings, expiry dates, batch information) is made perceivable for users with sensory impairments.	Accessibility of labels and instructions

### Draft contract conditions

- Accessibility KPIs attached as a contract schedule
- Obligation to notify the agency if accessibility-related complaints or safety issues arise

## Stage 3: Evaluate and award

Assess compliance against mandatory criteria.

Evaluate responses against desirable evaluation criteria based on the following example score rating:

<b>Evaluation criteria</b>	The extent to which the supplier demonstrates that diagnostic consumables are designed and supplied for equitable use by all users, including people with disability, without reliance on segregated or inferior alternatives.
<b>Low score</b>	<p><b>Does not meet requirements</b></p> <ul style="list-style-type: none"> <li>• Supplier proposes a <i>standard kit</i> and a separate “<i>accessible</i>” <i>kit</i> for users with disability.</li> <li>• The accessible version is only available on request and has longer lead times.</li> </ul>

	<ul style="list-style-type: none"> <li>No clear justification is provided for why inclusive design could not be embedded in the standard consumable.</li> </ul>
<b>Medium score</b>	<b>Meets requirements</b> <ul style="list-style-type: none"> <li>Supplier provides a single, standard consumable design intended for use by all users.</li> <li>Minor usability limitations are acknowledged, but no separate or inferior alternatives are proposed.</li> <li>Evidence shows consideration of diverse users during product design.</li> </ul>
<b>High score</b>	<b>Exceeds requirements</b> <ul style="list-style-type: none"> <li>Supplier demonstrates inclusive design embedded by default, supported by usability testing with diverse users.</li> <li>Consumables are identical for all users, with optional <i>non-segregated</i> support materials (e.g. alternative formats).</li> <li>Equity considerations are documented and clearly linked to product development practices.</li> </ul>

<b>Evaluation criteria</b>	The degree to which the supplier demonstrates flexibility in the use of consumables to accommodate varied user abilities and preferences.
<b>Low score</b>	<b>Does not meet requirements</b> <ul style="list-style-type: none"> <li>Consumables require a single, precise method of handling.</li> <li>No evidence is provided of design features supporting users with limited grip strength or dexterity.</li> </ul>
<b>Medium score</b>	<b>Meets requirements</b> <ul style="list-style-type: none"> <li>Supplier demonstrates basic flexibility through design features such as clear orientation cues and stable handling surfaces.</li> <li>Guidance included for alternative handling approaches where appropriate.</li> <li>No additional complexity is introduced.</li> </ul>
<b>High score</b>	<b>Exceeds requirements</b> <ul style="list-style-type: none"> <li>Supplier provides evidence of multiple design features supporting varied abilities (e.g. textured grips, stabilising elements).</li> <li>Optional accessories or formats are available without changing the core consumable.</li> <li>Flexibility is achieved without increasing user complexity or clinical risk.</li> </ul>

<b>Evaluation criteria</b>	The effectiveness with which the supplier presents critical information in formats perceivable by users with diverse sensory abilities.
<b>Low score</b>	<b>Does not meet requirements</b> <ul style="list-style-type: none"> <li>Labels use very small font sizes with low contrast.</li> <li>Critical information (expiry date, warnings) is difficult to locate.</li> <li>No alternative formats for instructions are offered.</li> </ul>
<b>Medium score</b>	<b>Meets requirements</b> <ul style="list-style-type: none"> <li>Labels use readable font sizes and adequate contrast.</li> <li>Critical information is clearly grouped and consistently located.</li> <li>Instructions are available in standard digital format upon request.</li> </ul>
<b>High score</b>	<b>Exceeds requirements</b> <ul style="list-style-type: none"> <li>Supplier provides high-contrast labelling with clear hierarchy of information.</li> <li>Instructions are available in multiple accessible formats (e.g. large print, accessible digital).</li> <li>Visual information is reinforced with clear diagrams and symbols.</li> </ul>

Build agreed key performance indicators and supplier commitments regarding accessibility into the head agreement.

## Stage 4: Manage contract

Suppliers provide:

- periodic confirmation that consumables, labels and instructions remain unchanged or accessible
- notification of design, packaging or supplier changes
- reporting of accessibility-related incidents or complaints.

Arrangement manager conducts periodic spot checks and/or meetings to ensure supplier compliance against accessibility clauses of head agreement. In addition, feedback is collected from agencies that use this arrangement on whether it is meeting their and end-users' needs, and whether any issues have been raised, to inform a future review of the arrangement.

## Example 2 – Routine procurement: Purchasing office stationery

### Scenario

A Queensland Government agency requires a bulk order of office stationery valued under the agency's low-value procurement threshold. The items include pens, markers, notebooks, post-it notes, paper and folders.

### Stage 1: Plan

As the items are standard, off-the-shelf consumables, accessibility risk is low. However, consistent with good procurement practice and the QPP 2026, accessibility considerations are briefly considered and addressed.

For example, the following lists considerations linked to the accessibility principles which may inform the specifications:

- Equitable use – Consumables can be used by staff with and without disability.
- Flexibility in use – Items support a range of preferences or working styles where practical.
- Simple and intuitive use – Items are familiar and easy to use without instruction.
- Perceptible information – Labelling is legible and information can be understood.
- Tolerance for error – Incorrect use does not cause harm.
- Low physical effort – Items do not require excessive force or fine motor control.
- Appropriate size and space for use – Items can be handled and stored easily by diverse users.

The purchasing strategy is to procure from an established common-use supply arrangement for stationery.

### Stage 2: Go to market

Invite two suppliers from the common-use supply arrangement to quote, emphasising key accessibility considerations.

This could include, for example, focusing on:

- Equitable use – Can most staff reasonably use these items?
- Perceptible information – Is product labelling readable?
- Low physical effort – Are items easy to open and handle?

### Stage 3: Evaluate and award

A simple evaluation approach is taken, using a pass/fail rating for each accessibility consideration. For example, markers with labels in very low-contrast lettering, this may be a fail against 'Perceptible information'.

A supplier is selected and a purchase order is issued.

### Stage 4: Receive goods

On receipt, confirm items match the order and that there are no obvious usability issues (e.g. damaged packaging, illegible labelling).

Encourage staff using the stationery to report to the procurement team instances where there are any issues with the product.

If an accessibility issue is identified, items are swapped using standard supplier return processes and an alternative product is selected next time.

## Appendix 2: Complaint examples

The AHRC investigates complaint allegations relating to non-compliance with the DDA and highlights other human rights systemic issues and legislative responsibilities.

The following complaint examples have been sourced from the [Access for all: Improving accessibility for consumers with disability](#) publication by the AHRC. The examples are subject to a license by the AHRC under the [Creative Commons Attribution 4.0 International Licence](#).

For the purpose of this guide, each example has been categorised against a procurement category and demonstrates the importance of embedding accessibility requirements as part of procurement planning to reduce the risk of unintended discriminatory impacts.

### *Information accessibility – Information and Communication and Technology*

Unable to access product assistance:

A woman with a hearing impairment complained that when she sought help from an information technology company in relation to a recently purchased product, she was told that assistance was only available over the phone. The company said that the complainant had received incorrect advice. The company did provide online product assistance and assistance via TTY (teletypewriter) relay services. The company apologised for what had happened and offered the complainant 12 months free access to a service upgrade.

### *Accessible premises and events – Building Construction and Maintenance*

Barriers at entrances and items in aisles:

A woman who uses a wheelchair complained that she had difficulty shopping in her local supermarket due to such things as turnstiles at the entrance and displays and goods being placed in the aisles. The complaint was resolved when the supermarket agreed, among other things, to remove turnstiles at the entrance and convey instructions to staff about keeping passages clear and remodel displays to ensure aisles are kept clear.

Lack of lift access:

A man who uses a wheelchair complained that a publicly funded arts facility did not have public lift access. This meant that patrons who could not use stairs had to use the goods lift and be accompanied by staff through otherwise 'off limit' areas of the building. The complaint was resolved with an agreement that the arts centre would install an appropriate public lift.

Lack of audio loop:

A man who has a hearing impairment said he attended a lecture series at a public venue but was unable to hear the content as the theatre did not have an audio loop. The complaint was resolved on the basis of an agreement to provide the man with an apology, refund the fee he had paid and install an audio hearing loop in the theatre.

### *Accessible transport – Transport and Infrastructure Services*

Lack of ramps for buses:

A man who uses a wheelchair complained that ramps on the accessible buses in his area were frequently out of order for long periods. The complaint was resolved when the bus operator confirmed that the ramps had been repaired and arrangements made to ensure the workshop gave priority attention to ramp maintenance and repairs in the future.

### *Web accessibility – Information and Communication Technology*

Problems with online banking:

A woman who has a vision impairment complained that she could not access her credit union's online banking service because the security features that had been installed to verify identify were not accessible to her. The complaint was resolved when the credit union agreed to upgrade its site to provide an accessible method for verifying a person's identity.