Communications Consumer Panel and ACOD response to GDS' Technology Group Technology Code of Practice

The Communications Consumer Panel (the Panel) and the Advisory Committee on Older and Disabled People (ACOD) welcome the opportunity to respond to GDS' Technology Group Technology Code of Practice.

The Panel works to protect and promote people's interests in the communications sector, including the postal sector. We are an independent statutory body set up under the Communications Act 2003. The Panel carries out research, provides advice and encourages Ofcom, governments, the EU, industry and others to look at issues through the eyes of consumers, citizens and microbusinesses.

The Panel pays particular attention to the needs of older people and people with disabilities, the needs of people in rural areas and people on low incomes, and the needs of micro businesses, which have many of the same problems as individual consumers.

Four members of the Panel also represent the interests of consumers in England, Northern Ireland, Scotland and Wales respectively. They liaise with the key stakeholders in the Nations to understand the perspectives of consumers in all parts of the UK and input these perspectives to the Panel's consideration of issues. Following the alignment of ACOD with the Panel, the Panel is more alert than ever to the interests of older and disabled consumers and citizens.

Response

The Panel and ACOD welcome the code and the strong section on accessibility including links to documents on accessibility guidance and provide assisted digital support.

We would make three general points before commenting on specific drafting.

The first relates to digital engagement. Ed Vaizey, Minister for Culture, Communications and Creative Industries, has highlighted the fact that "Every part of the UK economy and our lives has been digitised – from how we shop and entertain ourselves to the way we travel to work and manage our health." The Panel has urged Government to consider how intimidating this may be for those who can't - or simply choose not to - go fully 'digital'. While the Panel has worked historically with the Government Digital Service to support the development of the assisted digital offer, it is our belief that unless fundamental action is taken, the digital divide risks becoming an ever greater digital gulf as the distance increases between those who are online and those who remain firmly anchored in the offline world. The potential consequences of this exclusion are serious: for individuals, especially those who are more vulnerable; for society; for business; and for the UK economy. Digital literacy, especially on security and privacy matters, is going to be critical. The Panel has commissioned research to update its previous work on consumers'

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and citizens' understanding of, and attitudes in these areas, which we will publish later this year.

We believe consumers and citizens who are not - or in some cases not yet - digitally engaged, should not be unduly disadvantaged by progress for the majority. Along with assisted digital support, there should still be an analogue provision that works, so that people can still use public services effectively and are able to find out about healthcare, jobs, courses and ways to improve their own lives. We have also urged government to consider the rights and abilities of the proportion of UK adults who are not functionally literate or are learning English as a non-native language. Consumers who live in hard-to reach rural locations – and, we would add, inner city locations – need to be given support to access reliable, high quality broadband and mobile networks, so that these communities can benefit and participate effectively. It is vital that all consumers and citizens are able to feel empowered in the way they interact with the state and that none are left marginalised.

Our second point is that accessibility should be part of "business as usual", but at a time when, as the code stresses, resources are limited and time and cost pressures are intense, its importance at all stages should be stressed, if the introduction of technology is to "contribute to the transformation of the relationship between the citizen and the state and the delivery of public services" as the code states.

Thirdly, there is a range of access methods favoured by individuals which includes phone, email, letter, text relay, video relay, and face to face contact. We would urge that as far as possible, the introduction of technology should include flexibility to offer a full range to citizens.

On specific drafting points, we welcome that in Getting Started, the first requirement is that:

"Departments must carefully consider the:

- user - discover the needs of those who will use the technology"

This then links through to https://www.gov.uk/service-manual/user-research/start-by-learning-user-needs. However, although the information above is detailed, it does not at this stage explicitly identify the requirement to consider the needs of and problems for older and disabled people.

We believe that the interests of all users are best served when the range of diverse needs is considered from the start, so we propose that the requirement should be extended on the lines of:
Departments must carefully consider the:

- user - discover the needs of all those who will use the technology including older and disabled people".

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Also, the document on researching user needs could usefully include more examples including personas of people with a range of impairments and older people.

Research commissioned by the Panel and ACOD, We're Not All the Same - Inclusive Communications illustrates the problems disabled people have with contacting organisations and the vital importance of flexibility and responsiveness to individual needs, including for those unable or unwilling to use the internet.

This leads into Section 4 – Accessibility. We believe that this covers key issues and helpfully directs to further guidance. However the first bullet point "make things accessible by ensuring that you follow accessibility guidance and provide assisted digital support where your research shows that users need it" is possibly ambiguous - following accessibility guidance should not depend on research.

We suggest:
"Make things accessible by:

- ensuring that you follow accessibility guidance. Assisted digital support should be provided where your research shows that users need it. "

We would also suggest an addition to the second bullet point, highlighted in bold below:
- designing services and systems for the diverse set of users who will interact with them - including people with visual, hearing, cognitive and physical disabilities and impairments - in line with EN 301 549 . *Involving users with a range of impairments in extensive user testing throughout*.

In relation to the third bullet point we would again suggested an addition, as highlighted below:
- allowing access to applications through a range of browsers to ensure your solution will work for any end user device *and for users including those using assistive technology*.

The linked to document on browsers https://www.gov.uk/service-manual/technology/designing-for-different-browsers-and-devices does not include reference to users of screen readers and other assistive technology. We welcome however that it does, however, mention the need to take account of rapidly changing patterns of access to the internet. We are particularly aware of the increasing use of tablets by older people.

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