Communications Consumer Panel and ACOD response to the ITU consultation on access to the internet for persons with disabilities and specific needs

The Communications Consumer Panel (the Panel) and the Advisory Committee on Older and Disabled People (ACOD) welcome the opportunity to respond to the ITU consultation on access to the internet for persons with disabilities and specific needs.

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

We welcome this opportunity to assist the ITU in its consideration of the different challenges facing people with disabilities and specific needs (e.g. lack of ICT skill sets etc.) in accessing and using the internet; and the ITU's intention to provide examples of good practice and recommendations for governments to help tackle these challenges and bridge the gap.

Challenges facing persons with disabilities and specific needs in accessing and using the internet

The UN Convention on the Rights of Persons with Disabilities[1] recognises access to information and communications technologies, including the Web, as a basic human right. And while the advantages of using the internet apply to all groups in the community, they

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[1] http://www.un.org/disabilities/default.asp?navid=12&pid=150

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are especially relevant to people who are disabled, on a low income - and older people - many of whom may be less mobile than younger people. Yet take-up of and participation in the digital world are unequal and levels of use of the internet vary significantly. Older and disabled people, and those in low-income households, are much less likely to use the internet at home.

Ofcom's 2015 Communications Market Report (CMR)[2] highlighted that home internet access among UK adults stood at 85% in Q1 2015. The impact of using communications technology should not be underestimated - seven in ten (69%) internet users say that technology has changed the way they communicate and six in ten (59%) say these new communications methods have made life easier. Levels of agreement for all statements are higher among 16-24 year olds and lower among those aged 55+.

The Panel and ACOD believe that all consumers should be able to benefit from the opportunities and enjoyment that communications services can bring. According to Ofcom's latest Adult Media Use and Attitudes Report[2], 14% of UK adults remain not online (for any reason) and are more likely to be aged over 65, and in DE households. Two in three people aged 75+ are non-users of the internet. The figure below illustrates this further and shows that while 14% of adults in the UK are non-users of the internet, this is more likely for those aged 65-74 (30%) and 75+ (67%) as well as among DEs (25%). While not shown in the chart there has been no significant change in this incidence of non-users among all adults since 2013 (17% in 2013 vs. 14% in 2014).

Ofcom's illustration of non-use of the internet in the UK in 2014

Figure 186: Incidence of non-use of the internet, by demographic group
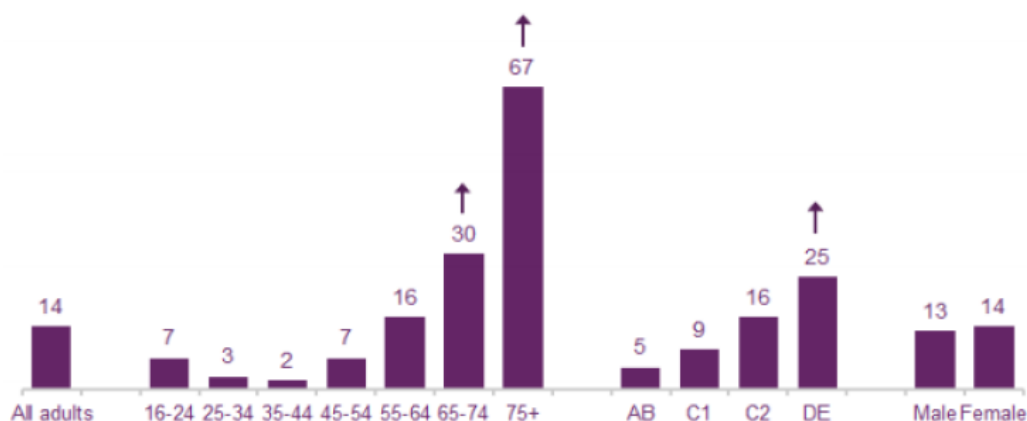
Derived from several questions - IN1/ IN2/ IN3 / IN4 (See questionnaire)
Base: All adults aged 16+ (1890 in 2014, 254 aged 16-24, 288 aged 25-34, 327 aged 35-44, 284 aged 45-54, 276 aged 55-64, 221 aged 65-74, 240 aged 75+, 430 AB, 551 C1, 376 C2, 533 DE, 927 male, 963 female).
Arrows show significantly higher groups for (95% level) for age and socio-economic group compared to all adults

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[2] http://stakeholders.ofcom.org.uk/binaries/research/cmr/cmr14/UK_4.pdf

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Ofcom's recently published research on disabled consumers' access to, and use of, communication devices and services[3] has also highlighted that access was generally lower among consumers with a disability than among those without. While internet access has increased among disabled people since Ofcom's 2013 report, it remains significantly lower for those consumers with a disability (65%) than for non-disabled consumers (88%). Further analysis found that not all disabled consumers with access to communication devices and services were making personal use of them. A fifth of disabled consumers said their disability prevented their use of at least some communication devices and services, with differences seen among consumers with different disability types.

The challenges faced by disabled people can be compounded by the extra costs they face

The Panel has previously highlighted the fact that an increasing number of commercial services are only available online - or delivered offline in a way that effectively penalises users, through higher costs or lower quality. This can have a disproportionate impact on some disabled people, or people with specific needs. Companies should design websites, processes and equipment with people's specific needs in mind from the outset.

As a general guide, companies should note that users with disabilities need patient and flexible customer support and adaptable processes – people with mobility and dexterity impairments may not be able to reach or lift various pieces of equipment, people with cognitive impairments may find it difficult to remember passwords or need time to process instructions and people with visual or hearing impairments may require adaptable website design (including font size, colour, resolution, compatibility with screen readers and the subtitling of videos). These are illustrative examples, but to gain a full understanding of the specific needs of people with dexterity, mobility, cognitive, hearing, visual and other impairments, companies should engage with consumers who want to use their products and services and ask them about their specific needs, or review existing research, such as the Panel's 'Inclusive Communications' research, highlighted on page 7 of this document[4].

The report 'Valuing Digital Inclusion - Calculating the social value to individuals of going online'[5], written by Eilís Lawlor for the BT Get IT Together Project (published in June

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[3] http://stakeholders.ofcom.org.uk/market-data-research/other/cross-media/disabled-consumers-ownership-comms-services/Disabled-consumers-use-of-communications-services/?utm_source=updates&utm_medium=email&utm_campaign=Disabled-consumers-use-of-communications-services&utm_term=disability%2C%20disabled%2C%20communications%2C%20services%2C%20mobile%2C%20phone%2C%20tv%2C%20landline%2C%20research

[4] http://www.communicationsconsumerpanel.org.uk/research-and-reports/we-re-not-all-the-same-inclusive-communications

[5] http://www.btplc.com/Betterfuture/ConnectedSociety/Creatingpossibilities/Valueofdigitalinclusion/Valuing-Digital-Inclusion.pdf

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2014), quantifies the value of digital inclusion for a new user as an estimated £1,064 per annum. This clearly highlights the link between financial and digital inclusion.

The estimated benefit increases to £3,568 for a professional user. A professional user could be a disabled person of working age who is able to work remotely for an employer; or he or she could be the owner of a microbusiness, who lives with a disability and is able to work remotely, perhaps promoting their products and services online.

Recent statistics from the Office for National Statistics (ONS)[6] show that working from home is more common among individuals who are older. For all adults - aged 16 and over, in work - 13.9% were home workers in January to March 2014 and for those workers aged 65 and over, 38.3% worked from home. Comparable statistics on the number of home workers who have a disability are lacking, but we would argue that access to the internet could play a significant role in enabling people to work from home more, thus reducing associated costs.
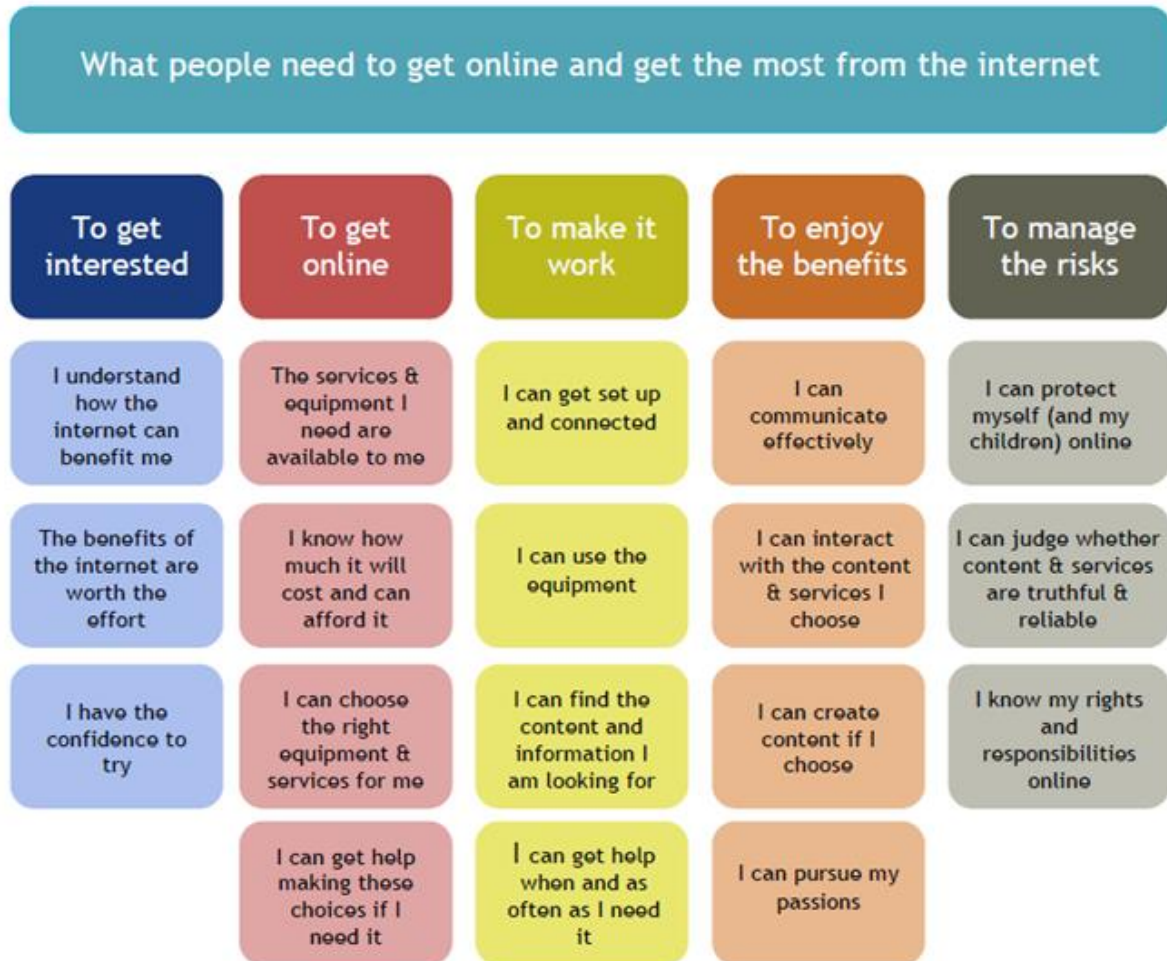
Digital engagement – the Consumer Framework for Digital Participation and Bridging the Gap

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[6] http://www.ons.gov.uk/ons/rel/lmac/characteristics-of-home-workers/2014/rpt-home-workers.html

The Panel has developed a Consumer Framework for Digital Participation[7] (below) to help government and others increase the number of people using the internet.

What people need to get online and get the most from the internet

To get interested	To get online	To make it work	To enjoy the benefits	To manage the risks
I understand how the internet can benefit me	The services & equipment I need are available to me	I can get set up and connected	I can communicate effectively	I can protect myself (and my children) online
The benefits of the internet are worth the effort	I know how much it will cost and can afford it	I can use the equipment	I can interact with the content & services I choose	I can judge whether content & services are truthful & reliable
I have the confidence to try	I can choose the right equipment & services for me	I can find the content and information I am looking for	I can create content if I choose	I know my rights and responsibilities online
	I can get help making these choices if I need it	I can get help when and as often as I need it	I can pursue my passions	

In 2012, the Panel commissioned research on digital engagement. Our report, 'Bridging the Gap: Sustaining Online Engagement'[8], details the Panel's recommendations to governments and others. Whilst there has been some progress in some areas these recommendations – shown below for ease of reference – largely hold good today in our view.

1. There needs to be a clearer and more comprehensive policy on take-up and use of, as well as access to the internet.
2. To enable this, there is a pressing need to strike a better balance between funding for broadband roll-out and funding for ongoing support to enable people with additional needs

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[7] http://www.communicationsconsumerpanel.org.uk/the-consumer-framework-for-digital-participation/the-consumer-framework-for-digital-participation-1
[8] http://www.communicationsconsumerpanel.org.uk/bridging-the-gap-sustaining-online-engagement/bridging-the-gap-sustaining-online-engagement-2

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to take full advantage of the benefits of the online world. Governments should not sacrifice access for all, for speed for some.

3. To ensure that progress is made, it is vital that initiatives are open and accountable and that clear targets are put in place for take-up and use, based on an agreed definition of what constitutes an 'active internet user' for these purposes. An evaluation framework would facilitate the accurate assessment and monitoring of progress.

4. The Panel considers that the frequently-quoted and widely-adopted measure of 'those who have ever/never used the internet' is not helpful for policy development. Progress should be measured by ongoing use, not by initial access alone. A more appropriate measure of people's ability to function online would be whether they have gone online themselves in the past month, together with an assessment of the breadth of their internet use.

5. Messages designed to encourage people to go online must acknowledge that people make an emotional and financial investment in going online. The messages need to explain online benefits in a language that connects with people's everyday life and reflects the differing needs of consumers.

6. The Panel encourages suppliers to undertake the development of introductory low priced/low-risk products, teamed with low-cost broadband access, initially without long-term commitment, to reduce risk and promote trialling.

7. The tactics used to reach people who are not yet online need to be re-thought; and it is important that there is co-ordination between stakeholders, and agreed strategic aims. The potential role of local authorities, housing associations, employers and other related agencies and workers in the community (e.g. care workers) should be fully exploited, to embed awareness and an understanding of the possibilities online.

8. The Panel highlights the fact that the use of simpler technology, personalised support and emphasising the transferability of skills can bring real benefits for users and enable people to understand the usefulness of the internet.

9. The Panel strongly supports the drive to make websites simpler, designed around user needs and experience rather than those of the provider.

10. The Panel encourages coordinated overall support for agencies by Go ON UK, and a collaborative exchange of information. This would ensure a consistent message, and bring cost efficiencies for front-line agencies, to enable them to undertake more outreach activity.

'Bridging the Gap' highlighted that, in addition to access, people's breadth of use also needed to be supported and measured. We believe that locally based agencies have a key role to play – particularly libraries, which provide a trusted and inclusive environment, and which should be used more to support ongoing learning in a sociable, unintimidating way.

We would encourage the much greater availability of free public Wi-Fi, together with appropriate advice about relevant security. We have been encouraged by the initiatives

announced concerning libraries and the NHS estate and hope that these will be rolled out as soon as possible, together with Wi-Fi availability in schools and colleges.

One example of the way this has been put into action to help people on low incomes is highlighted in the UK Government's Digital Inclusion Strategy, in a case study on the Peabody Housing Association: https://www.gov.uk/government/publications/government-digital-inclusion-strategy/government-digital-inclusion-strategy

Information in plain language - as well as on-going support - is a necessity for more vulnerable users. This will help ensure that they are able to choose affordable, up-to-date, equipment which suits their needs and that they continue to engage with the technology once they have it; – and it will help prevent them from falling foul of scams and data privacy issues.

The Panel believes that providing better, clearer information and advice will benefit all internet users, but should be designed with the practical considerations of disabled consumers in mind. Websites should be designed following W3C accessibility guidelines[9] from the outset, with user testing involving disabled people and companies should respond to feedback and complaints from users in order to ensure that their websites remain accessible and continually improve.

Since 'Bridging the Gap' was published, the Panel has monitored the evidence available from Ofcom, the ONS and other sources, including Ofcom's Consumer Experience[10] and Digital Day Report[11], published in January 2015. We support Ofcom's further research into the needs of disabled consumers and citizens.

Customer service and systems

Following a wider research report on customer service experiences[12], in 2015 the Panel published 'Inclusive Communications'[13], a report based on research we commissioned into the experiences of older and disabled people across the UK in accessing communications services. Some of our key findings which are relevant to this consultation are below:

➤ Communications services enable older and disabled people to overcome barriers to inclusion and to preserve and increase their social capital
➤ Systems-related issues such as passwords and call routing systems can act as barriers to inclusion

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[9] https://www.w3.org/standards/webdesign/accessibility
[10] http://stakeholders.ofcom.org.uk/market-data-research/market-data/consumer-experience-reports/consumer-experience-14/
[11] http://stakeholders.ofcom.org.uk/market-data-research/other/cross-media/digital-day/2014/
[12] http://www.communicationsconsumerpanel.org.uk/going-round-in-circles/going-round-in-circles
[13] http://www.communicationsconsumerpanel.org.uk/research-and-reports/we-re-not-all-the-same-inclusive-communications

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> ➢ There is a lack of awareness – among service users and some communications providers' staff – of specific rights for disabled people relating to equivalent access

Our research (from which the following quotes are taken) showed the importance of the internet to the disabled and older people who use it:

> *"I think when everything's running fine in terms of communications networks, I'm not as disabled as I might be."*
> *(John, 41, multiple impairments, urban South England)*
>
> *"I feel I can be part of the outside world with my internet. And nobody needs to know how I'm feeling or how I'm looking on any particular day. So, it's actually, I put that above everything."*
> *(Gail, 53, multiple impairments, Urban North England)*

But it also showed that standard systems and processes that were not adaptable to the needs of older and disabled consumers could prove to be a barrier:

> *"They'll ask you for your passwords and memory is a big thing for me... I honestly can't tell you what my password is."*
> *(Eileen, 48, multiple impairments, urban Scotland)*
>
> *"What they want to do is to get onto your computer and share your screen. I can't do that with them because I've not got a screen […] because I'm using a bespoke device configured for blind people, so I have to say to them I'm sorry, you can't go on my screen."*
> *(Paul, 62, blind, urban North England)*

We made a number of recommendations for communications providers and alternative dispute resolution schemes, in addition to providing suggestions for consumers that may help improve their customer experience. Full details of the recommendations can be found at: http://www.communicationsconsumerpanel.org.uk/research-and-reports/we-re-not-all-the-same-inclusive-communications. They include:

Enhance customer service

➢ Provide a service that provides equal access to all users regardless of any impairments they have
➢ Allow consumers to communicate in the way that best suits individuals' needs and abilities
➢ All staff – and especially contact centre agents - should have disability training so they understand people's situations and the equipment they may be using
➢ Customer service agents must use clear language and be trained and empowered to depart from scripts when necessary

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- Develop and promote a culture that exemplifies offering a flexible solution and taking extra time to explain details when required
- Seek the views of disabled and older customers on their experience and ask for their suggestions for improvement

Match communications systems and processes to individual needs

- Communications providers and Alternative Dispute Resolution (ADR) services should both ensure contact channels are inclusive or provide and promote alternative, appropriate, equivalent methods of access and communication
- Ensure that all customers can easily use customer service systems – including making a complaint - and monitor that this remains the case
- Call steering menus should have no more than three options and if the customer doesn't select any option, the call should go to an agent rather than be disconnected
- Ensure that people using assistive technologies can contact customer services without being disconnected
- Keep a record of needs and ensure that all contact is in a suitable/accessible format, including outgoing as well as incoming communications
- Maintain clear records of previous contacts with the consumer

Have a dedicated disability team

- Explore ways to identify customers who need extra help and get them to the right place quickly
- Provide a dedicated person or team to deal with disabled customers
- Offer specialist access routes – designed with and around people who are going to use them
- Relevant customers should be routed direct to these specialist teams via provision of a specialist number or transferred to the team by an agent
- Specialist routes need to be signposted
- Offer flexible third-party arrangements, including the possibility of multiple pre-arranged registrations, so other people can assist the account holder

Better promote equivalent access channels/ GC15[14] service provision

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[14] Ofcom's General Condition 15 sets out a number of obligations to protect the interest of customers with disabilities. For example, the condition requires all providers of Publicly Available Telephone Services to provide particular groups of disabled customers with (i) suitable directory services including call connection services, (ii) access to text relay services which include particular facilities, (iii) access to priority fault repair services without payment of a premium, (iv) participation in a nominee scheme to safeguard service in the event that a bill is not paid and (v) copies of contracts and bills in a form suitable for visually impaired customers. Providers must ensure that the availability of these facilities is widely publicised in appropriate formats.

- Inform all customers of the existence of alternative access channels and the services and rights available under GC15 – especially the priority fault repair register and the safeguard scheme, including third-party bill management.
- Actively promote services and rights of equivalent access in line with GC15 and make these rights explicit in communications
- Ensure full operational compliance with GC15
- Proactively offer equivalent access channels

Examples of good practice in assisting people to use the internet

In the UK, support and examples of good practice can be found via various sources, some of which are listed below:

- Go ON UK and the Tinder Foundation provide digital skills training across the UK, with industry partners:
    http://www.go-on.co.uk/
    http://www.tinderfoundation.org/ - an infographic depicting useful statistics on the UK's 'digital divide' in 2015 can be found on the Tinder Foundation's website, here:
    http://www.tinderfoundation.org/sites/default/files/digitalnation-2015-webb.pdf
- Aidis Trust provides guidance in selecting and using computer technology.
- AbilityNet offers free specialist support to disabled people, including free to download factsheets, telephone support and direct IT support from a network of volunteers http://www.abilitynet.org.uk/advice-information
    AbilityNet's list of Top Ten Accessible Apps list shows the range of apps that may be of use to disabled people.
- The Business Disability Forum (BDF) is a not-for-profit member organisation that aims to make it easier and more rewarding to do business with and employ disabled people: http://www.businessdisabilityforum.org.uk/about-us/ Their technology taskforce brings together a large number and range of companies and global brands with the aim of making accessibility and usability fundamental to technology: http://technologytaskforce.org/ The BDF also produced the Walkway Pound report: http://businessdisabilityforum.org.uk/about-us/news/walkaway-pound-report-2015/
- The Post Office is a trusted partner, particularly to older and less 'tech-savvy' consumers: http://corporate.postoffice.co.uk/getting-connected
- The Mobile Manufacturers' Forum has a website which allows people to search for devices by accessibility feature: https://www.gari.info/
- BT's website has a search function which allows people to locate local, free courses: www.bt.com/includingyou/getting-online-find-a-centre.html

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- ➢ Age UK have developed an affordable piece of adaptive, simplified, personalisation software, called Breezie, which is included with an affordable tablet and a basic level of support: http://www.breezie.com/all-about-breezie/
- ➢ 'Fix the Web' – a project run by Citizens Online and funded by Nominet: http://www.fixtheweb.net/ - volunteers contact organisations about issues reported by members of the general public.
- ➢ The Inclusive Design Toolkit - University of Cambridge, Engineering Design Centre and sponsored by BT: http://www.inclusivedesigntoolkit.com/betterdesign2/

Summary

- ➢ All consumers should be able to benefit from the opportunities and enjoyment that communications services can bring;
- ➢ The internet can make life easier and reduce costs –people with disabilities, people who are older, or on lower incomes should be assisted to go online and continue to build confidence and skills to use the internet;
- ➢ Governments need to ensure a clearer and more comprehensive policy on take-up and use of, as well as access to the internet;
- ➢ Where people chose not to go online - or while they are still unable to do so confidently - they should not be penalised for using offline equivalent services;
- ➢ Companies should design websites, products and services that enable users with specific needs to benefit from them and should involve users in testing, also taking into account W3C web accessibility guidelines;
- ➢ Examples of good practice are easy to find and should be replicated by others, with funding from governments where relevant.

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