

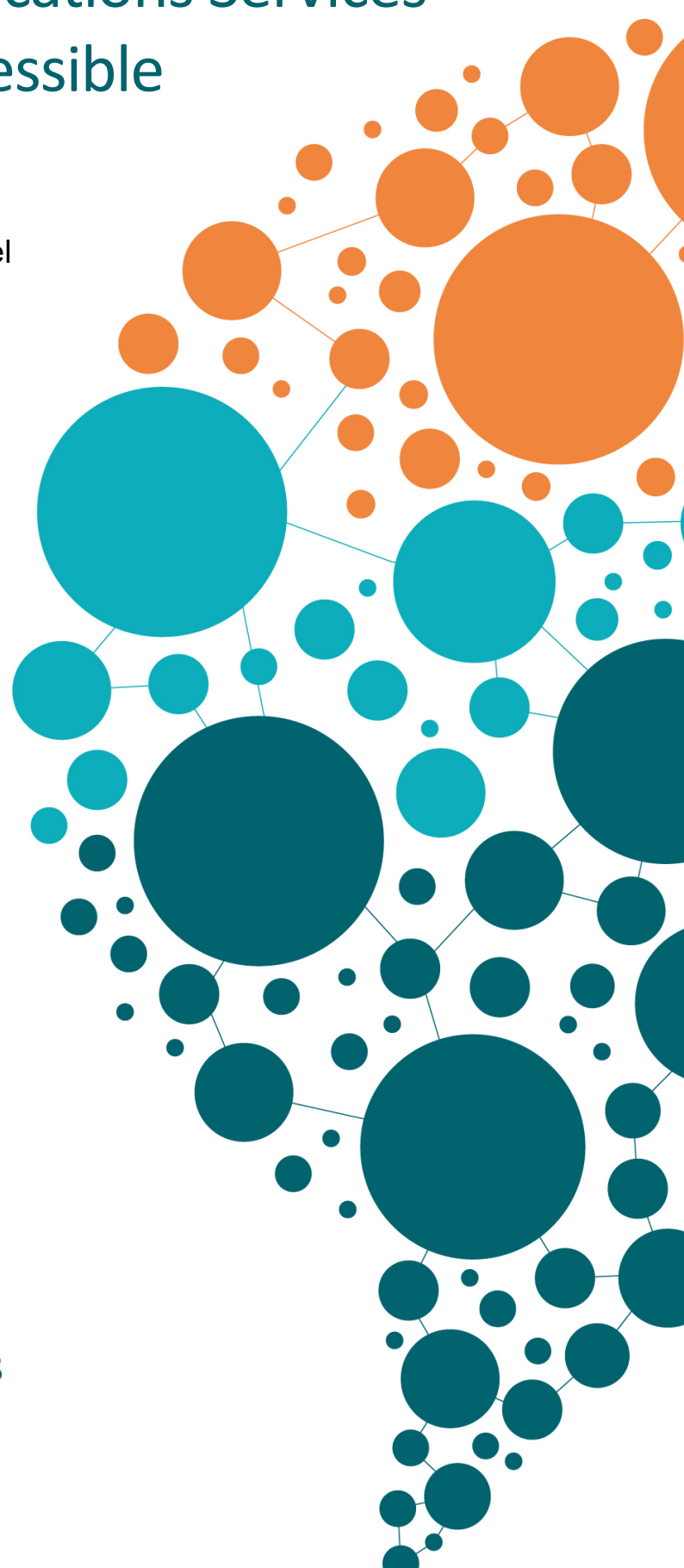
# Making Communications Services Inclusive and Accessible

A Think Piece for the  
Communications Consumer Panel  
by Graeme K Whippy MBE

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Communications  
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# This is important, take action

## The issue

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- Being able to communicate, receive information and make informed decisions are basic human rights.
- People are at risk of being denied these rights due to barriers in using communication services.
- Barriers arise from inaccessibility and poor usability, particularly in relation to services delivered via websites and mobile apps.
- Barriers can create or increase a risk of vulnerability.
- Disabled and older people are disproportionately impacted.
- This is bad for customers, bad for society, and bad for business.

## Why fix it

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- Improving accessibility and usability makes things easier for everyone.
- Personalising services and meeting individual requirements creates a great customer experience.
- Great customer service creates competitive advantage in a crowded market.
- It is less expensive to embed accessibility at the outset than fix mistakes retrospectively.
- Bad customer experiences can go viral.

On the next page, I set out 'Ten things to do now', to help make communications services more inclusive and accessible.

## This is important, take action

### Ten things to do now

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- 1) Update the “contact us” page on your website so it contains all your contact methods, including phone, text/video relay and postal address.
- 2) Encourage customers to share their service requirements with you from before they become customers and then throughout their time with you.
- 3) Ensure you have the means to capture service requirements, focusing on impact and not cause, and integrate them into customer services and processes.
- 4) Have a clear and easily found policy on making reasonable adjustments for customers.
- 5) Provide all front-line staff with training to raise awareness of the service requirements of disabled and older people and how to accommodate them.
- 6) Embed compliance with accessibility standards (digital, documents and premises) into your service development and delivery lifecycle.
- 7) Educate all stakeholders on the importance of accessibility and usability and how it relates to their role.
- 8) Conduct research (such as mystery shopping) with disabled and older customers on the accessibility and usability of your services to create a baseline from which you can measure improvements.
- 9) Do not buy products or services that create barriers: embed accessibility into your procurement process.
- 10) Consider how new technologies and convergence of services could be used to improve inclusion, and how could you collaborate with others in the sector to create lasting change.

# Introduction

## Accessible, inclusive communications must be a given

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We take accessibility for granted – as a right – in many aspects of life, such as tactile curb cuts on pavements, ramps into shops, hearing loops in the bank, and accessible toilets in public buildings. Many of these adjustments have been long fought for by disabled people and allies and are now starting to be built into planning processes from the design stage.

There is always room for improvement – such as consistent provision of ‘changing places’ toilets – but comparing where we are now to, say 30 years ago, most people would agree that significant progress has been made.

The time has come to do the same with communication services.

Meeting accessibility guidelines on websites and mobile apps is an important basic step, but alone it is not sufficient to create a good customer experience and remove barriers that might be faced by customers with access or service requirements.

Attention must be paid to accessibility and usability of all service channels, not just digital, and this includes the simple ability for a customer to contact their communications provider by phone, along with ensuring that associated products, materials, and communications are provided in a way that meets individual customers’ needs.

Failing to do this is bad for the customer, bad for the communications provider, and ultimately bad for our society because communication and accessing information are basic human rights.

## Understanding disability, customer vulnerability and accessibility

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This Think Piece is rooted in the Social Model of Disability, i.e., people with sensory, physical, or cognitive differences are not “disabled” by those differences, they are disabled by the barriers they face in the environment and society.

### Disability

We recognise that many people do not consider their functional differences to be a “disability”, but the fact remains they are disabled by the barriers they face in going about their everyday lives. So, when we use the term “disabled customer” we include D/deaf<sup>1</sup> people, blind and partially sighted people, neurodivergent people, and those with other physical and cognitive conditions. We also note that some people prefer to

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<sup>1</sup> Deaf with a capital D denotes those who consider their deafness to be a linguistic and cultural attribute.

be referred to as ‘disabled people’ and some as ‘persons with disabilities’. We are using consistent terminology in this Think Piece for clarity, but listening to an individual customer and taking the cue from them as to how they would prefer to be described is the best way to be inclusive and respectful.

## **Vulnerability**

In this Think Piece we sometimes use the term “otherwise vulnerable customer” alongside “disabled or older customer”. Accessibility (or more accurately inaccessibility) and vulnerability are linked but not the same.

For clarity:

- Some people have additional service or access requirements arising from disability, age, both of these, or other factors. These people are reliant on products and services being accessible (usable regardless of any physical or mental limitations a person might have).
- Some people are at risk of harm (vulnerable) due to their circumstances.
- Not all disabled or older people are vulnerable, and not all vulnerable people are disabled or older.
- Inaccessibility creates barriers for some people, and barriers can create or increase a risk of vulnerability.

Furthermore:

- Barriers can disproportionately impact vulnerable customers. For example, all customers are impacted by having to wait in a call centre queue. However, someone who is vulnerable might give up waiting sooner (maybe due to anxiety or confusion), and hence do not get served or their issue addressed.
- Transient circumstances can exacerbate barriers and increase vulnerability, e.g., failing to pass security checks when tired, stressed, or anxious and not to be served as a result.
- Vulnerability can be compounded by loosely based assumptions, such as assuming a customer is not vulnerable simply because they have a mobile phone, not appreciating that a mobile phone is essential for the customer because they live in a remote rural area.
- Improving accessibility of products and services is therefore essential for some customers, can reduce risk for others, and is generally advantageous for all.

## **Accessibility for all**

Ensuring products and services are accessible can help meet legal duties both in relation to discrimination and vulnerability, but as explained later in this document it is best not to focus on legal definitions and duties, and instead look beyond the law and aim to achieve best practice in accessibility and usability.

## Think Piece goals

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This Think Piece aims to help Communications Providers by:

- 1) Explaining the challenges that exist for disabled people and older people in relation to communication services, or those with other access or service needs.
- 2) Providing practical advice on improving accessibility and usability, thus helping address the challenges and remove barriers for these customers.
- 3) Using this as a platform to create excellent customer experience that is good for customers and the communication provider's business.

# Why access to communications matters

## Lifeline, not luxury

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Communicating is a basic human right. Article 19 of the [Universal Declaration of Human Rights](#) (UDHR), states that:

“Everyone has the right to freedom of opinion and expression; this right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media and regardless of frontiers.

Denying, or making it difficult for people to communicate with others or obtain information impacts their ability to make informed decisions, express their views and wishes, and participate democratically in society.

After the 28 years since it was invented, the World Wide Web and other Internet services (such as email, instant messaging, and video calling) have become the primary means of communication and accessing information and services for billions of people, and the primary channel used by service providers to deal with customers.”

Having a phone – especially a smart phone – is not a luxury, it’s an essential aspect of living in today’s world, and for many the ability to use a phone and its features is a lifeline that enables independent living.

In this respect, just like water or utilities, communications access is an essential service and customers must be protected from disconnection if they struggle to pay their bills. Communications providers are required to publish vulnerability guidance, which sets out how they will protect vulnerable customers. Ofcom’s ‘Treating Vulnerable Customers Fairly’ guide<sup>2</sup> advises that communications providers should ensure they support customers in this situation and only use disconnection as a last resort, but how many customers are aware that support is available? How many communications providers make their customers aware?

Likewise, what protections or safety nets exist that prevent customers being disconnected if they run out of data? With a move to internet-based telephony (Voice Over IP) running out of data does not just mean no web browsing, it could mean no voice calls.

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<sup>2</sup> [Treating vulnerable customers fairly: A guide for phone, broadband and pay-TV providers \(ofcom.org.uk\)](https://www.ofcom.org.uk/treat-vulnerable-customers-fairly/)

## Price premium

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It is a lifeline though that comes with a price premium for many who, because of their circumstances, require better phones (e.g., larger screens and enhanced features), bigger data allowances and other support and services (such as sign language interpreters for Deaf people).

People with such requirements may be disadvantaged if they have no option to use cheaper phones or packages, and if they cannot afford more expensive ones then they risk suffering from “language poverty”.

There are also many who do not have specific or enhanced requirements who simply cannot afford the price of entry into the digital world, so called “broadband poverty”, impacting not just their ability to communicate and access information, but also being economically active as consumers, accessing services, learning skills, and offering skills to others.

## The digital divide

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The adoption of digital technology has been a revolution for consumers, enabling previously unimaginable levels of speed, simplicity and convenience when accessing goods and services. For many disabled and older people digital has been a liberator, enabling them to live independent, enriched lives.

Likewise, it has been a boon for retailers and service providers who are able to reach a bigger market and deliver services quicker and at reduced costs compared to non-digital “bricks and mortar” times.

However, moving to digital is still a challenge for many people, with 9 million adults in the UK unable to use the Internet without help<sup>3</sup> and 1.5 million homes not online<sup>4</sup>. In addition to significant regional variations (with London and the South East fairing far better than the Midlands, North, Wales, Scotland and Northern Ireland), generally speaking the older and more isolated people are the more likely they are to be digitally excluded.

Common barriers include:

- Cost of devices and mobile data packages
- Lack of confidence in using the technology
- Fear of scams and fraud
- Lack of motivation by not seeing the need or benefits

The drive toward “digital by default” when it comes to providing services and improvements in digital inclusion must be tempered by the reality that not everybody

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<sup>3</sup> The University of Manchester: [“Experts call for action to be taken to tackle the UK’s digital divide”](#)

<sup>4</sup> Ofcom: [“Digital divide narrowed by the pandemic, but around 1.5m homes remain offline”](#)

will go online, and those who do not still have the right to access information and services. Their needs must be catered for and failing to provide alternative means of accessing information and services is a denial of the basic human activities and rights cited in previous sections.

## Language poverty

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Some groups of people face additional barriers with respect to language and failing to address these barriers creates “language poverty” that impedes people from communicating or receiving information in a way that is easiest for them.

Examples include:

- People who are Deaf and who use sign language who have limited or no spoken language skills.
- People who are deaf and have spoken language skills.
- People with learning disabilities who communicate using Makaton and/or EasyRead
- People with conditions that affect language skills, such as those with dementia or who have strokes.

Communications providers need to listen to consumers and their representatives to understand the challenges faced by people and have strategies that utilise and enhance their language abilities.



An example of use of EasyRead by Ofcom can be seen in the guide produced to support its 'Stay Connected During Coronavirus' campaign. The Communications Consumer Panel listened to participants at its National Stakeholder Hubs and advised Ofcom that an EasyRead guide would help make the campaign accessible and inclusive of more consumers. Ofcom's guide is published here: [Stay connected during coronavirus – EasyRead version \(ofcom.org.uk\)](https://www.ofcom.org.uk/consult/condocs/stayconnected/stayconnected_easyread.pdf)

# Achieving accessibility by default

## Back to basics

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### What do we mean by “accessibility”?

Accessibility can be defined as:

"Making something usable and as understandable as possible for as many people as possible, regardless of any sensory, physical or cognitive limitations or differences they might have, or the situation in which they are using it."

“Something” in the context of communication services is very broad and includes:

- Devices that customers use (such as phones and tablets).
- Communication services that run on the devices (voice, video, messaging, or specialist services such as text or video relay).
- Customer support services (delivered via app, web, chat, and contact centre).
- Materials and information provided to the customer (including website and printed materials).
- High street shops and in-person service.

“Limitations and differences” are normally taken as meaning:

- Full or partial loss of the primary senses of sight or hearing.
- Loss of function in hands, arms and legs through limb loss, paralysis, shakes or spasms.
- The ability to process and remember information, arising from conditions such as learning disabilities, dyslexia, and autism.

“Situation” can affect something’s ease of use, for example trying to use it:

- In bright sunlight
- In a noisy environment
- Whilst holding bags
- Whilst trying to conduct multiple tasks at the same time

### The basic principles of POUR

For something to be accessible it needs to adhere to four basic principles with the acronym POUR:

- **P**erceivable by at least one of the senses.
- **O**perable via at least one part of the body.
- **U**nderstandable regardless of language or intellectual capability.

- **Robust** by working across different situations and technologies, be resilient to and help prevent errors, and adaptive to change.

POUR was originally conceived by the World Wide Web Consortium (W3C) in its Web Content Accessibility Guidelines (WCAG), but the principles are universal.



**Perceivable:** by sight and touch.

**Operable:** by finger, hand, elbow, or any body part that can reach beneath it.

**Understandable:** by virtue of its placement, its appearance, and a pictorial instruction sticker above.

**Robust:** prevents accidental use by operating upwards, not down.

### **Why bother about accessibility?**

Turn this around – why would you not want to make something easier for everybody to understand and use?

Everybody at some point will experience reduced sensory, physical, or intellectual capability either through age, accident, illness, or simply the situation they are in.

Accessibility provides a foundation for ensuring that they can continue using your product or service when in this situation, and when allied with best practice in usability it results in a more productive and enjoyable customer experience for all.

Accessibility therefore benefits all customers and prospective customers – not just those who are disabled or older – and the communication provider as well:

- Improve customer experience by removing hurdles and barriers that make it difficult for people to use your services and interact with you.
- Reduce operating costs by reducing customer issues and complaints.
- Reach and retain new customers and, through word-of-mouth, their family, and friends.

- Reduce the risk of infringing legal duties<sup>5</sup> by not creating disadvantage for disabled customers.

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<sup>5</sup> All references in this document to “legal duties” mean under The Equality Act 2010 in Great Britain, and Disability Discrimination Act 1995 in Northern Ireland.

## What does “good” look like?

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### Standards and guidelines

A definition of “good” can be found in a number of standards and guidelines. The following table provides examples that are commonly used and, in some cases, easier to understand and hence apply than the official British Standard or ISO standard they are derived from.

Standard or guidelines	Applicable to	Notes
<a href="#">Web Content Accessibility Guidelines</a> (WCAG)	Websites, mobile apps.  Some aspects are also applicable to documents, spreadsheets, and presentations.	Achieving WCAG 2.1 Level AA is considered best practice.  WCAG is treated as a de facto standard and is referenced by many legal jurisdictions around the world.
<a href="#">UK Association for Accessible Formats</a> (UKAAF)	Documents (e.g., those created in Microsoft Office, Open Office, Google G-Suite), PDF, and alternative format documents (e.g., Large Print, Braille, Audio).	Predominantly used by companies as a reference when creating alternative format materials for customers.  Additional guidance on PDFs is available in PDF/UA (formerly ISO 14289)
<a href="#">Centre for Accessible Environments</a>	Premises and facilities.	Also see related UK building regulations <a href="#">Part M</a> and <a href="#">BS 8300</a> .

### Don’t do the legal minimum

There is a legal duty for service providers not to cause disadvantage for disabled people and to make “reasonable adjustments” to address disadvantage that may arise.

A legally compliant approach could be adopted comprising of (a) do nothing unless a disabled customer raises a complaint, and/or (b) doing the minimum to address disadvantage. For example:

- Just meeting WCAG Level A success criteria on a website or mobile app.

- Creating a large print document when requested by a customer just by enlarging it on a photocopier.
- Doing the minimum in building design to meeting Part M building regulations.

This approach has several drawbacks:

- Aiming for a legal minimum will derive minimum benefits in relation to customer experience and retention.
- Aiming for the legal minimum might not actually address disadvantage and result in the need for additional actions at additional cost.
- It will not address disadvantage in a systemic manner, resulting in the need for multiple interventions and associated costs should other customers be affected.
- It is far more costly to retrospectively “fix” processes, systems, and the built environment than to design and build them correctly from the outset.
- There is greater reputational and legal risk (and associated financial costs) in trying to meet the law rather than go beyond it.

## Usability is critical

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### Accessible is not always Usable

Accessibility guidelines and standards provide a means for assuring the principles of POUR are achieved, but just because something is technically accessible (i.e., meets the required standard) does not automatically mean that it is usable, or will result in a great customer experience.

For example, creating a mobile app that meets all WCAG Level AA success criteria could still be very challenging and confusing for an older person because of jargon or the complexity of completing a task. Given the trend for smart phone apps to be used as a sole or default service channel, the usability of apps is critical.

So absolutely follow best practice in accessibility (see the later section on stopping accessibility being an afterthought), but also ensure usability is addressed.

### Clarity in up-front thinking

Firstly, be clear on what needs to be achieved in relation to accessibility and usability goals when developing or changing a product, service, or process. For example:

- The customers that will use or be impacted by the change.
- The barriers they might face and how these can be minimised.
- Any limitations or compromises that must be made in relation to specific and potentially conflicting user requirements.
- The approach that will be used to ensure the agreed accessibility and usability goals are attained and measured.

This could be included in an Equality Impact Assessment or a separate Accessibility Policy Statement.

## **Human centred and inclusive design**

The above is aided by human centred and inclusive design techniques. The British Standards Institute (2005) defines inclusive design as:

“The design of mainstream products and/or services that are accessible to, and usable by, as many people as reasonably possible ... without the need for special adaptation or specialised design.”

This approach to design starts with thinking about people that will be using the thing that is being designed for them and ends with a solution that is purpose-built to suit their needs (not necessarily their “wants” – there is a distinction, as aptly demonstrated by The Simpsons with [Homer's Car](#)).

This can include the use of “personas” that bring to life the requirements of different users in a way that all members of a development team (such as analysts, designers, developers, process engineers, customer service) can understand and act as a reference. For example, “How would Naheed feel about this?”, “How would George perform this task?”

Personas must reflect real life people, not assumptions about the needs of real-life people or their feelings or behaviours. It is therefore essential to create them using insights gained from focus groups and customer research.

There is a wealth of resources available on human and inclusive design, such as:

- [Microsoft Inclusive Design Toolkit](#)
- [University of Cambridge Inclusive Design Toolkit](#)
- [Design Council Inclusive Design Toolkit](#)

## **Think holistically**

When considering the inclusive designing systems and services, thinking must go beyond the technology and Human Computer Interface and include factors such as:

- Presentation and formatting of information (both text and visual)
- Clarity of language (e.g., minimum reading age)
- Process design, and the simplification and standardisation of processes

## **Agile is not a barrier**

A common push back against including accessibility in development is that it takes additional time, and this does not fit with an agile approach where speed is of the essence.

Not so. The granularity of sprints and collaborative working that are the essence of Agile can help achieve best practice; break accessibility down and incorporate it

within the sprint by capturing accessibility requirements for a given feature (e.g., required alt text, keyboard interactivity, vocalisation) so if they are missed they are treated as defects, not missing features, and encourage UX designers, developers and testers to work together in identifying solutions.

For further information see the blog "[Accessibility in Agile Transformational Practices](#)" by Deque.

### **Continual improvement via feedback**

It is essential to test with representative customers (and willing members of staff) throughout the development lifecycle or sprint in order to know whether design goals are being met and to assure the accessibility and usability of the product, service, or process.

In a waterfall approach do not leave testing until the end of the development lifecycle, e.g., as part of user acceptance testing, because any issues identified at that point will be far more difficult and costly to address.

There is also no need to leave testing until the end because customers can provide valuable feedback on:

- Wireframes and visual designs
- Process flows and customer journeys
- Prototypes
- Incremental releases
- Building design and test layouts
- Devices in development or being considered

If the personas (or other techniques) are truly representative they will include disabled and older people, and those with specific technology requirements such as assistive technology (screen readers, magnifiers, etc.).

Also do not forget to test associated materials with customers, such as supporting information and instructions, on-line and printed forms, alternative format materials, etc.

The feedback arising from customer testing should be captured and used to continually improve the new or changed product, service, or process prior to and after launch.

Testing is not a "one off" activity and should be conducted regularly post launch, e.g., after service updates or changes.

Tools that can be used to gain feedback and insight include the use of focus groups and mystery shopping organised by companies that have access to large and representative panels of disabled and older people, such as:

- [Fable](#)
- [Open Inclusion](#)
- [Research Institute for Disabled Consumers](#) (RiDC)

## How to stop this all being an afterthought

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### Best endeavours are not enough

In many organisations there are committed individuals who strive to ensure the accessibility and usability of their company's products and services. However, unless the organisation takes a formalised approach to accessibility they will remain "islands of excellence" and "evangelists" whose knowledge and effort will be transitory and unsustainable in the long term.

Accessibility and usability must be treated as a business imperative, not a best endeavour.

### Secure business buy-in

A challenge faced by accessibility advocates in many organisations is that accessibility is still seen by the business as a cost, not a benefit, or not as high in priority as other competing initiatives.

This is a symptom of accessibility being viewed or treated as an optional extra or "nice to have" rather than an intrinsic aspect of the way the organisation thinks about and serves its customers.

It is therefore essential that accessibility is aligned to overarching business goals and to secure the mandate and advocacy of senior business leaders in its adoption.

Some suggestions on how this can be done:

- Simplify accessibility so it is easy to understand and relate to.
- Show how accessibility can support business initiatives aiming to increase revenue or reduce costs.
- Highlight opportunities that might not be obvious (e.g., how useful the iPhone is to people with sight loss).
- Use existing accessibility issues as an opportunity to create change but *always* provide a solution when highlighting an issue.
- Always seek to build accessibility into existing practices, not as an additional activity at additional cost. If additional costs would be incurred demonstrate their benefit, or that they can be saved in the long term.

- Senior executives do not like red issues on a risk register, so that might also be a way get their attention. Generally speaking, though it is better to use reputational or legal risk as a last resort.

## Educate

Accessibility is a cross-functional endeavour, and all stakeholders need to have at least a basic understanding of accessibility and their role in ensuring the accessibility of customer products and services.

Stakeholders should receive training that gives this understanding, the depth and nature depending on their role:

- **Project managers:** the need to resource, fund and schedule accessibility activities in development or change projects.
- **Analysts:** ensuring accessibility and usability are captured as mandatory non-functional requirements and working with the business to that end.
- **Designers:** how accessibility influences design and how to meet accessibility standards during design.
- **Developers:** the technical skills required to meet accessibility standards when building a product or service.
- **Testers:** how to test accessibility and usability.
- **Content authors:** how to create accessible documents, information, and instructions.
- **Process engineers:** how barriers can arise in processes and customer journeys.
- **Procurement team:** the importance of not purchasing products and services that create barriers, and procurement's role in acting as a back-stop for the business in preventing mistakes from being made.
- **Marketing and communications:** how to create communications and marketing materials that are accessible.
- **Customer service agents:** insight into the barriers that can be faced by customers with access or specific service requirements and operational procedures that can help them.

## Embed

Achieving the goal of “accessibility by default” is dependent on making it a “business as usual” (BAU) way of working, something that just happens without prompting or reminder. This requires a holistic approach that involves getting everybody thinking about it and embedding it into operations.

An effective way to do this is to make it a formal part of the organisation's standard change management process, backed by a governance approach that ensures it happens and provides a mechanism to deal with non-compliance.

In securing hearts and minds there is nothing wrong with going for minds first (because something has to be done) and then hearts (because it is a good and right thing to do).

For example:

- Include accessibility in the organisation's standard mandatory non-functional requirement catalogue (along with things like security and resilience).
- Include accessibility as appropriate in all programme/project documentation templates, e.g., project definition template.
- Include accessibility questions in procurement templates (e.g. Request For Information, Invitation To Tender<sup>6</sup>) and ensure that supplier responses to accessibility are scored on a par with other critical non-functional requirements such as security.
- Include checks for accessibility in the service delivery process, e.g., questions at key "stage gates" to check for compliance with agreed standards, and deal with instances of non-compliance in a way that prevents accessibility issues being ignored and remaining unaddressed.

## Don't stand still

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Every organisation that has become great at accessibility and usability has not done so overnight. Achieving best practice takes time and should be viewed by all stakeholders as a marathon, not a sprint.

Furthermore, it's not a journey that will ever be finished: customers' requirements and services will continue to evolve, as will the technology they use and best practices in accessibility. There will always be more to learn and opportunities to improve, and this should be embraced not feared.

Organisations need to develop a constant sense of curiosity in what they can do to serve customers better, push boundaries in what they offer and how they offer it, and, in turn, gain competitive advantage.

Understanding where an organisation stands in terms of best practice in ICT accessibility and how it can continually improve can be gained by using Accessibility Maturity Models. These are typically presented as tables where the rows define specific aspects (or dimensions) of accessibility and the columns the degree of capability, increasing left to right. The cells contain indicators for each level of maturity for each aspect of accessibility.

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<sup>6</sup> Proactis: ["Making accessibility more accessible in procurement"](#)

THE FOLLOWING ARE IN THE PUBLIC DOMAIN AND FREE TO USE:

- Business Disability Forum (BDF) [Accessibility Maturity Model](#) (AMM): the 10 dimensions of the AMM are aligned to the BDF's Accessible Technology Charter.
- Level Access [Digital Accessibility Maturity Model](#) (DAMM): this is a fork of the original BDF AMM created by Level Access in the USA. It too contains 10 dimensions, along with another 3 related to HR.

In addition to the maturity models, organisational capability can be developed using [ISO 30071-1](#), a code of practice for creating accessible ICT products and services. This supersedes British Standard BS 8878 and provides a comprehensive guide to the business case for accessibility and the tools and processes to embed best practice.

## Know your customer

Most organisations see delivering high quality customer experience as a way to gain competitive advantage because it helps attract and retain customers, especially in a sector like communications where there is an abundant consumer choice of providers.

Personalisation of service has become increasingly important both as a way to deliver high quality customer experience and as differentiation in crowded markets<sup>7</sup>. There is also, of course, a legal duty to make “reasonable adjustments” for disabled customers which can be viewed as a specific form of personalisation.

Personalisation or making adjustments is reliant on knowing your customer, and this is reliant on capturing their preferences or service requirements.

### What information to capture

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Capturing customer preferences or information about their circumstances, particularly those related to health or disability, have long been a cause for concern for service providers and even more so since the introduction of the General Data Protection Regulations (GDPR) introduced to the Data Protection Act 2018.

Caution is prudent (especially as service or access requirements could be classed as “personal data” which have specific GDPR provisions) but it should not prevent the capture and storage of data that will enable you to provide great customer service and, moreover, alleviate the risk of disadvantage.

Broadly there are two types of information that are relevant:

- Permanent service or access requirements, such as the need for Text Relay, alternative format materials or a different way to verify identity.
- Circumstances or a situation that need to be taken into account or will require a change in the way the customer is supported, such as bereavement, being newly diagnosed with a condition, recovering from injury or surgery.

This is not a guide to GDPR, but the key principles are:

- There is nothing preventing you from asking a customer about their service requirements.
- You must be explicit in how the information will be used.
- You must only store their service requirements or other personal information if the customer grants explicit consent for you to do so.
- If you store service requirements, it is best practice to only store the requirement or solution (e.g., requires large print), not the underlying cause

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<sup>7</sup> McKinsey: [“Personalizing the customer experience: Driving differentiation in retail”](#)

(e.g., they have sight loss) unless it is needed to address disadvantage or otherwise enable you to serve the customer.

Other conditions and rules apply, see the [ICO guidance on GDPR UK](#).

## When and how to capture it

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Gaining insight into customer preferences or service requirements is not a one-off activity, it should start even before someone becomes a customer and then continue throughout their time as a customer of the communications provider.

Customers should then be prompted to share their service requirements through the signing up and on-boarding process, and then at regular touchpoints such as monthly billing, new product/service promotions, etc.

They should also have the ability to update their service requirements at any time via customer service agents, or by self-service in their account information via mobile app or website.

Finally, do not forget to capture feedback from customers when they leave in order to understand how their service requirements were met, or not, in order to aid continual improvement.

## What can be done without consent

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Customers need to understand that without giving their communications provider explicit consent to store their service requirements that their needs can only be met in the here-and-now, for example in the conversation or interaction they are conducting with a customer service agent.

The customer service agent will not be able to share the information with others – again without explicit consent – and knowledge of the customer's service requirements will expire once the conversation is over.

This will constrain the communications provider from delivering the quality of service it aspires to, it will be frustrating for the customer as they will have to repeatedly request or make their requirements known, but it is the best that can be done.

## Integration with customer service and journeys

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Information about customer service requirements can be captured in two ways:

- Flags or indicators related to specific service requirements, e.g., need for alternative format materials, additional time on the phone, use of text relay.
- Free text annotation or notes attached to a customer record (compliant with GDPR provisions on personal data).

## Flags

Primarily flags can drive process automation, for example triggering the automatic production of alternative format materials for customers that require them.

They can also provide insight for customer service agents when dealing with a customer (though agents should not make assumptions based on a flag, e.g., someone requiring large print could have dyslexia or sight loss).

Flags can also be more “searchable” in a database than free text which enables a communications provider to be proactive in identifying customers who might have specific needs or require support, for example:

- Adjusting tariffs and data caps for customers at the start of the lockdown in the Covid pandemic.
- Identifying all customers who use Sign Language and might require specific communications in the event of emergency.

## Notes

Notes can provide additional information or insight for customer service agents in relation to a customer’s requirements when interacting with them, for example when conversing on the phone or via chat. This in turn helps deliver better, personalised service that avoids making basic mistakes. For example, making a customer service agent aware that someone has sight loss will help them avoid saying something like “click the button on the left of your screen” and the annoyance it creates for the customer.

They can also help with subtleties in customer interaction that cannot be covered by flags (as it is not possible to have a flag for every eventuality), for example avoiding particular words or phrases that might trigger anxiety.

Notes can also help ensure appropriate customer service, such as preventing the inappropriate selling of products and services to a particular customer.

## Single view of the customer

For this to work effectively a “single view” of the customer is needed where data is held in a single database or is aggregated rather than, for example, being held in different databases for account management, billing, marketing, etc.

If customer data is fragmented then information relating to service requirements will need to be replicated across them, or else run the risk that some systems and staff will not have a complete view of the customer and mistakes will be made as a result.

# Creating a great customer experience

## Make accessibility a core part of customer service

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Making services accessible and usable should be a default for the benefit of all customers, not just those that are older, disabled or in situations that make them vulnerable.

It is not just about technology though; in addition, company behaviours need to change along with the things that drive them, for example removing targets on contact time when a customer has known service requirements or support needs, or dealing with a customer situation in a different way.

These behaviours are in turn determined by operating policies and rules, so these need to be adapted to give customer facing staff “wriggle room” and the ability to do things differently for individuals, balancing organisational needs with those of the customer, and being pragmatic and understanding.

For example, maintaining account security is obviously essential for the communication provider and the customer, hence the need for robust customer ID&V (identification and verification). However, there may be circumstances when more flexibility is needed, such as enabling a family member to have limited access to the account of a temporarily or unexpectedly incapacitated older customer who does not have Power of Attorney in place. Risk must be judged on a case-by-case basis, not a blanket “computer says no” rule.

## Make people aware of what you do to help

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“If you build it, he will come”. *Field of Dreams* (1989)

Sadly, in the real world this is only true if he (or they, i.e., your customers) know you have built it.

What is the point of spending time, effort, and money on developing features in your products and services that deliver great customer service if people do not know about them? For example:

- Your attention to detail on accessibility and usability and the benefits this brings for customers.
- Your willingness to be flexible and adapt the way you interact or serve customers according to their needs or requirements.
- The way you can support people in challenging situations or circumstances.

This is not only great for customer experience but also it is a way to differentiate and create competitive advantage, so it makes no sense to keep quiet and assume people will know about it.

Therefore, advertise what you offer and the added value for customers who have service requirements or support needs. Reach beyond the demographic you normally target in your advertising (such as Gen Z or Millennials) and seek out customers in different life stages and situations, along with their families (e.g., children of older parents). Also consider alternative advertising channels that might be more likely to reach this audience, such as mailers and local press.

Also remember that “people” includes your own employees; all too often (especially in larger organisations) customer facing staff on the front line are not aware of what is available to support customers with service requirements or support needs, how services can be adapted to meet such needs, or what is permitted under their operating guidelines and procedures. Not only does this mean they are unable to help when needed, they are also not attuned to the signs that the customer might need additional support or opportunities to improve the quality of customer experience.

This does not just impede customer service, it can impact sales. For example, if staff in your high-street shops are not sufficiently aware of what can be provided to help people with hearing loss, e.g., no knowledge of Relay UK, the accessibility features on phones or compatibility with hearing aids, how likely are they to be able to make a sale to a deaf person? The same would apply with the accessibility features on phones that help people with sight loss, impaired dexterity, etc.

## **Make it easy for people to contact you**

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Whilst e-communication (e.g., messaging, on-line chat, and email) are very convenient for you and many of your customers, sole reliance on these will disproportionately impact disabled and older people who struggle with technology, and anyone at times of need or crisis, e.g., when difficult personal situations arise, or accessibility requirements change.

For customers in this category or in these situations being able to speak to someone rather than electronically message them might not just be a preference, it could be essential.

Therefore, provide a variety of communication methods that work best for a wide range of communication needs and preferences, and make sure that phone numbers are not hidden in order to nudge people towards on-line channels. Likewise provide offline information for those unable or unwilling to go on-line.

Also consider providing a clearly signposted priority communications route for disabled, older, or otherwise vulnerable people as part of your value-added service.

## Encourage customers to tell you their needs and requirements

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Whilst your customer facing staff should be attuned to people's service requirements and support needs, generally speaking you cannot help unless you know. Therefore, you need to encourage customers to tell you their needs so you can serve them better.

Marketing and advertising materials should therefore promote your willingness to understand service requirements and adapt your services to meet them, and this should be done in a way that emphasises the benefits of doing so ("help us to help you").

Messaging should address the reasons why people do not share their access requirements, for example:

- They do not know what is available.
- They do not know how to ask.
- They are concerned about asking (e.g., confidentiality).
- They do not want to be labelled or grouped as being "different", or do not think that access requirements are "for them".
- They do not understand the benefits of asking (the WIFM – "what's in it for me?").

Addressing these reasons will increase the likelihood that people will share with you their service requirements or support needs, and in turn help you serve them better.

## Do things differently when required

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This has been mentioned several times in this document, but for clarity:

- 1) Do as much as you can to make your services accessible and usable by default for the benefit of all your customers.
- 2) Then on top of this be prepared and able to do things differently for individual customers that require it.

This is not just best practice; you also have a legal duty to prevent and address disadvantage by making "reasonable adjustments".

However, best practice is not to think about, treat or frame making adjustments as a legal duty per se, think of it as a core part of great customer service and doing it brilliantly as a key differentiator when it comes to attracting and retaining customers.

## What to do differently

This is not a guide on reasonable adjustments (refer to relevant legislation in your jurisdiction<sup>8</sup>) but for context, adjustments fall into two broad categories:

- Physical things: such as providing alternative format materials, different devices, or auxiliary aids, means of accessing shops, etc.
- Non-physical things: changes in behaviours or procedures such as alternative means of identification and validation, communications method, etc.

To be “reasonable” the adjustment must:

- Remove the disadvantage.
- Not create an undue burden (financial or operational) on the service provider.
- Not impact the health or safety of others.

Other conditions exist, again refer to your local legislation for further information.

## How to do it

Failing to make adjustments, and make them in a timely manner, presents significant reputational financial risk for any service provider: breaches of discrimination legislation invariably end up in the press, and financial compensation for claimants is unlimited. It is therefore best not to get it wrong:

- 1) Have a very clear policy on the provision of reasonable adjustments and make sure this is fully understood by all customer facing staff.
- 2) Automate as much as possible, e.g., production of alternative format materials so that customers that need them get them quickly and reliably without having to ask each time.
- 3) Have an easily found, simple to understand and robust process or operational procedure for dealing with customer adjustment requests.

Time is not the only consideration when it comes to making an adjustment, quality is also important and this is especially true when it comes to transcribing materials into alternative formats: it is highly advisable to work with experts in this field that have Service Level Agreements on turnaround time and quality, and that are able to deal with volume requests generated by, for example, your billing runs and marketing campaigns.

## Go beyond the extra mile

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As with accessibility, when it comes to doing things differently for customers doing the minimum required for legal compliance will derive minimum benefits and maximum risk.

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<sup>8</sup> Equality Act 2010 in Great Britain, Disability Discrimination Act 1995 in Northern Ireland

Instead, making accessibility, usability, flexibility, and personalisation part of a great customer service proposition will help differentiate you from your competitors, and help you compete in a highly competitive market by attracting and retaining customers.

Remember that every disabled and older person, or someone in a vulnerable situation for other reasons, will have family and friends with whom they will share their opinions. This will include positive and negative stories of the experiences they have had with service providers, and these spread like ripples in a pond.

Research conducted in 2015<sup>9</sup> showed that £1.8 billion per month was lost to businesses as 3 out of 4 disabled customers and their families and friends ‘walked away’ from service providers that were not attuned to disabled customer needs. Likewise, a survey conducted in 2019<sup>10</sup> showed that 69% of people with access needs “clicked away” from inaccessible retail websites, taking with them £17b in lost revenue.

Therefore, make sure your ripples are positive ones; remember that social media enables customers to share bad experiences very easily, and if a complaint strikes a chord it can quickly go viral<sup>11</sup>.

Other ways you can go beyond the extra mile for customers is by leveraging the experience of disabled and people you employ: linking employee experience to customer experience will derive additional insight and increase the credibility of your endeavours to improve customer experience. Likewise seek the advice and guidance of external experts experienced in disability, age, and vulnerability, such as charities and advocacy groups.

Lastly, learn from mistakes: they will happen, but try not to let them happen more than once. Ensure your complaint handling process (including capturing complaints and root cause analysis) and complaint handlers have a focus on accessibility and adjustments so that lessons learned can be captured and fed back into operational policy and procedures.

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<sup>9</sup> Business Disability Forum: “[Building disability-smart organisations](#)”

<sup>10</sup> [The Click-Away Pound Report 2019](#)

<sup>11</sup> SAGA: “[How to complain using Twitter](#)”

# Build the confidence of your people

## Empathy and behaviour

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Getting the practicalities of customer service right, such as timely provision of alternative format materials, is obviously essential but do not forget the broader, more subtle “softer” barriers that can be faced by disabled, older or other customers with specific access requirements which arise from the understanding and behaviours of customer facing staff.

When issues arise, it is very often down to how an individual member of staff has responded in a certain situation, not their organisation’s policies or operational procedures in themselves. And sadly, it can just take one bad experience to lose a customer: research has shown that 50% of customers will switch to a competitor after one bad experience, snowballing to 80% after more than one bad experience<sup>12</sup>.

Consequently, empathy is incredibly important in ensuring a good customer experience and minimizing mistakes or even just mismatches in customer expectations and the service they receive. Merriam-Webster defines empathy as:

“the action of understanding, being aware of, being sensitive to, and vicariously experiencing the feelings, thoughts, and experience of another of either the past or present without having the feelings, thoughts, and experience fully communicated in an objectively explicit manner”

From the customer’s perspective, empathy is where the person they are dealing with understands and cares about their situation, knows what to do to make it right or better, and then does it.

## Knowledge and awareness

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Customer facing staff must be confident and knowledgeable about the service requirements or needs of customers who are older, disabled, or otherwise have different access needs or are in a situation that makes them vulnerable.

Feedback from disabled and older customer groups is that all too often they have to tell communication providers’ customer facing staff what features or services are available to help, when of course it should be the other way round.

Consequently, front line staff must:

- Understand the challenges that customers in these situations can face.
- Know what their organisation can do to help, including the products and services they sell (and specific features of these products and services).

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<sup>12</sup> Zendesk blog: [“What is customer experience? How to deliver great CX”](#)

- Know what correct/appropriate operational procedures need to be followed in situations involving disability or vulnerability.
- Be able to sign post customers to additional support within their own organisation and externally.
- Be attuned to needs and signs to look out for when dealing with customers so as not to be reliant on a customer explicitly sharing their service requirements or needs, and confident in exploring these needs in a way that is not patronising or “othering” customers.

This requires a combination of soft “people” skills (e.g. emotional intelligence and personal communication) and technical skills (e.g. knowledge of policy and process); the vast majority of your customer facing staff will undoubtedly be predisposed to the soft skills (which is why they are performing a people orientated role) but might not be familiar with disability, age or other factors involving vulnerability, likewise they might not be familiar with products, services, procedures etc. that can help. Staff training will therefore be needed.

It is not feasible to make everyone an expert in these things so:

- Provide training for *all* customer facing staff that covers the essentials in understanding and anticipating the needs of disabled, older, or otherwise vulnerable customers.
- Signpost to sources of help internally and externally for more complex situations. This would include internal “champions” to whom other member of staff can turn to for advice or escalation.

This training should be a mandatory part of induction training, and you should have mandatory refresher training to keep it in people’s minds and to cater for changes in technology, products, services, and operational procedures.

This could be done as part of existing (DEI (Diversity Equality Inclusion) training and needs to include a practical understanding of the Social Model of Disability, and emphasising that this is not a theory, it is real life experience for disabled people.

It is also advisable to maintain a “knowledge hub” on accessibility and vulnerability and build this using internal and external expertise, for example as part of a feedback loop where customer facing staff can share hints and tips on what has worked well, or indeed outcomes of customer complaints and how to avoid them in the future.

If you operate globally, or use offshore staff for customer services, make sure that your training takes into account cultural and language differences relating to disability and age.

## #EndTheAwkward

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Many people feel uncomfortable or awkward in knowing what to do or what to say to a disabled person when serving them or otherwise interacting with them. This awkwardness is uncomfortable for everyone and can be the root of a poor customer experience, so it is very important that customer facing staff are given the support they need to get over this confidence “hump”.

[Research by the charity Leonard Cheshire](#) found that two in five (40%) non-disabled people surveyed stated they would be more likely to interact with disabled people if they knew the correct words to use.

Inappropriate use of language is also a significant cause for concern for disabled people; the same research found nearly half (46%) of all disabled people in Britain feel regularly ‘ignored’ or ‘over-looked’ by non-disabled people due to widespread use of inappropriate or demeaning language.

There are resources that can help:

- The charity Scope and Channel 4 produced a series of videos that explain, using humour, the awkwardness that can arise and how to end it. These [#EndTheAwkward videos on YouTube](#) are a great way to explore this topic
- Scope have also created a [short guide to language and hints and tips](#) as part of its #EndTheAwkward campaign
- The UK Government has a [guide on inclusive language](#) when communicating with or about disabled people.

# Moving forward

## Common challenges, common solutions?

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Disabled and older customers, or others that have access or service requirements, can face common barriers. Similarly, communications providers can face common challenges in removing those barriers.

So, are there actions that can be taken collectively or individually by communications providers to help address the challenges faced by disabled, older and vulnerable customers cited above?

For example:

- **Addressing the digital divide:** there is plenty of information on the barriers preventing people going online, could communication providers work together on an education programme to entice people online and give them the skills needed to get online and do so safely, like Barclays Bank's "[Digital Eagles](#)"?
- **Baseline of best practice:** Could communications providers pool their knowledge to create a common baseline of good customer experience for disabled, older, or otherwise vulnerable customers, creating a sector "kite mark" (with the option, obviously, of then adding additional value to create competitive advantage)? Examples of similar collaboration exist:
  - Oil companies worked together to share exploration costs, fusing their knowledge, resources, and wealth to reduce risk and maximise returns.
  - Banks, Building Societies, and Insurance Companies worked together with their respective trade bodies to create the [Dementia Friendly Financial Services Charter](#)
  - [Communication Access UK](#) helps organisations communicate with people who have communications difficulties, providing free training, standards, and inclusion in a national directory.
- **Consistency in recording service requirements:** there is currently no common understanding in the communications sector of additional service requirements, or how to record and track them. Consistency in this would benefit customers and simplify information capture for communication providers.
- **Social tariff:** in order to address the price premium and broadband poverty, could communications providers introduce an affordable minimum level access tariff with eligibility based on situation and not means testing?
- **Register of vulnerable customers:** Water and energy companies collaborated on cross sector sharing of data to support vulnerable customers. Could the communications sector do something similar? A "register once, register everywhere" approach would save the need for customers to have repeated conversations, reduce the risk of mistakes in selling or support, and would help preserve customer dignity.

- **‘One stop shop’ directory:** Could communications providers collaborate on a “one stop shop” directory of contact methods to make it easier for people to get in touch when needed?

## Convergence

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The communications sector is ever more convergent, with communications providers responsible for delivering a range of services, such as enabling consumers to view broadcast and on demand programme services on smartphones, tablets, laptops, and TVs.

Inclusivity of services will be increasingly dependent on a complex delivery chain of hardware, software and infrastructure, and communications providers will have a pivotal role in working with and procuring from others to ensure that they provide effective, usable services for all.

See Communications Consumer Panel’s research [Access to broadcast and on-demand content: Time to catch up!](#)

Convergence also presents an opportunity to address the digital divide: TVs and remote controls are ubiquitous devices in most homes, and older people and those who lack digital confidence are familiar with them. So why try to force round pegs into square holes in getting people to use the web and apps to access services when there is a device in their home they are already familiar with and comfortable using? Sometimes the simplest solutions are the ones right in front of us, in a corner of the living room.

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A full list of Hub participants and a summary of Hub discussions can be found at: [www.communicationsconsumerpanel.org.uk](http://www.communicationsconsumerpanel.org.uk)
- Participants of the Communications Consumer Panel's Industry Forum

## About the Author

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Graeme K Whippy is a consultant who helps organisations, and the sectors in which they operate, become inclusive and accessible for disabled people.

In the mid 2000s he was responsible for a paradigm shift in the way companies approach IT Accessibility and in 2010 created an award winning Workplace Adjustments process and encouraged employers to 'democratise' the provision of adjustments.

In 2012 he represented the banking sector on the Prime Minister's Dementia Challenge and led a pan financial services sector working group on creating the Dementia Friendly Financial Services Charter.

In 2018 he created a guide for the media sector on employing disabled talent, and in 2020 a guide for news organisations on interviewing disabled experts and contributors.

He works with clients in the public, private and 3<sup>rd</sup> sector, including Channel 4 Television, Viacom International Media Networks, TfL, Ofcom, Financial Ombudsman Service and RNIB.

He was awarded an MBE in 2016 for services for people with disabilities and dementia.