**The Panel’s National Stakeholder Hubs recently focused on what more can be done to promote inclusivity across the communications sector so that consumers, citizens and micro-businesses have a frictionless experience when using communications services.**

We believe that consumers, citizens and micro-businesses should be able to get the support they need from communications providers without facing any barriers to engagement. Our beliefs are supported by evidence from our stakeholders and research participants, who tell us that communications services should be inclusive by design to ensure that consumers’ access requirements are considered early-on in policy, product and service development to avoid unforeseen barriers and retrospective changes. In our strategic plan 2021-22, we encourage policy makers and industry to use inclusive design principles to capture a diverse range of consumers’ lived experiences and make services easily usable by all.

**The Panel’s think-piece on making communications services inclusive**

The Panel commissioned a disability and inclusion consultant, [Graeme Whippy MBE](https://uk.linkedin.com/in/graemekwhippy) to write a think-piece on inclusivity in the communications sector, highlighting existing areas of good practice and where improvements could be made. The think piece is written from the perspective of an experienced ‘change agent’ from outside of the communications sector, to combine cross-sector expertise with inputs from the communications industry, the regulator and consumer representatives, to provide communications providers with practical steps on how to improve inclusivity across their services and processes.

To help understand the types of barriers that communications consumers face, our consultant engaged with a wide range of stakeholders including Ofcom’s vulnerability team; Panel Members with specific expertise in this area; and organisations representing consumers with specific communications requirements – he also interviewed industry representatives to help define the use case for the piece.

We shared a draft outline of the think-piece with participants of the Panel’s National Hubs to gather views, feedback and thoughts of consumer-representative organisations across the UK. These inputs have fed into the think-piece and are summarised below. We intend to take the final piece to participants of the Panel’s Industry Forum before publishing and sharing it widely. We hope the practical suggestions within will help to secure and promote inclusivity across the communications sector.

**We asked our stakeholders what more could be done to make the communications sector more inclusive. Participants highlighted the barriers faced by communications consumers, citizens and micro-businesses across the sector and how providers could further support consumers and promote inclusivity.**

**Highlighted below are the key issues that emerged from our discussions with Hub participants across the UK Nations of England, Northern Ireland, Scotland and Wales.**

1. **Communications providers should seek to identify consumers’ access requirements early-on and throughout the consumer journey to ensure that requirements are consistently updated and met.**
2. **Communications providers should ensure that front-line staff have received sufficient training to understand consumers’ access requirements.**
3. **Communications providers should provide specialist support to consumers in vulnerable circumstances.**
4. **Communications services should be inclusive by design – ensuring that products and services designed for consumers are accessible to all, from the outset.**
5. **Communications providers should seek to identify consumers’ access requirements early-on and throughout the consumer journey to ensure that requirements are consistently met.**

* Providers should capture any consumer requirements early-on in the customer journey and avoid consumers having to repeat themselves in future.
* Identifying consumer preferences should be standardised and data shared across the communications sector e.g. communications passports.
* Consumer vulnerability data should be recorded consistently across the sector and continually refreshed to reflect the sometimes-transient nature of vulnerability.
* Many consumers are reluctant to flag specific access requirements with their provider as they don’t identify as being ‘vulnerable’. It was noted that consumer uptake to vulnerability registers is significantly low. Though, this could also be a consequence of many consumers being unaware that support exists.
* Providers should adopt the social model of recording disability, not the medical model e.g. capture consumers’ access requirements, not the reasons for them, to provide tailored support and prevent assumptions being made about the requirements consumers may have due to living with a particular condition.
* Front-line customer service staff should be empowered to divert from scripts where appropriate to reflect consumers’ differing needs.
* The needs of consumers differ and grouping consumers in one homogeneous group can act as a barrier to inclusivity. For example, in the d/Deaf community, the needs of sign language users are unlikely to reflect the needs of consumers who are hard of hearing. In addition, a recent report highlighted how the Covid-19 pandemic had impacted ‘older’ consumers differently.[[1]](#footnote-1)
* Providers may not always understand consumers’ requirements e.g. consumers with progressive illnesses may have evolving requirements. Providers should engage with consumer-representative organisations such as Age UK and Alzheimer’s Society to help understand consumers’ specific requirements.

1. **Communications providers should ensure that front-line staff have received sufficient training to understand consumers’ requirements, particularly those with specific access requirements.**

* Providers should mandate front-line staff to undertake disability training to improve customer service support.
* Retail and front-line staff should receive training on the accessibility features of products and services. This would help to educate consumers with access requirements about products on the market. In addition, consumers could make informed decisions and realise the benefits of different products and services.
* Organisations need to build front-line staff’s digital confidence and skills so they can help customers. An example was provided where an organisation rolled out new equipment to employees without any training and a skills gap emerged. In response, a skills audit was undertaken to identify the skills gaps and a Digital Champion was appointed. An external company was also appointed to conduct skills sessions and build staff confidence.
* Organisations could benefit from mystery shopping, which can identify areas for improvement to ensure an inclusive approach to communications is being implemented.

1. **Communications providers should provide specialist support to consumers in vulnerable circumstances.**

* Anyone can become vulnerable in their lifetime as a result of changing circumstances and life events e.g. bereavement. Consumers faced with these circumstances should be able to contact their provider quickly for information and/or reassurance.
* Some providers allow consumers to nominate a person to act on their behalf without Power of Attorney. This was considered a useful approach and could be adopted across the sector. Though, it was recognised that providers would need to balance delivering this service with protecting consumers from harm e.g. victim of scams. It was highlighted that while risks should be managed effectively, risk alone should not be a reason to avoid taking action.
* Financially vulnerable consumers need assistance to avoid becoming digitally excluded when they’re unable to afford data and digital infrastructure.
* Providers should automatically switch consumers identified as ‘vulnerable’ onto their best available tariff. NB: In 2020, following Ofcom’s broadband pricing review, Ofcom secured commitments from the largest broadband providers to reduce prices automatically for vulnerable consumers who are out of contract.[[2]](#footnote-2)
* Some consumers in vulnerable circumstances are not identified by their provider as vulnerable because they have access to a mobile phone. However, many devices are not accessible and/or consumers live in rural areas with no mobile coverage, or do not keep the phone charged and ready to use.
* It was suggested that a disability advisory group be set up by the UK government where interested parties could collectively raise issues in the telecommunications sector.
* Other industries have useful information on vulnerability, which the communications sector could consider and learn from.

1. **Communications services should be inclusive by design – ensuring that products and services designed for consumers are accessible to all, from the outset.**

* Providers should allow consumers to choose their preferred communication channel to encourage consumers to contact their provider when they need to.
* Providers should adopt a variety of consumer communications channels to cater for different consumer preferences and requirements. An example was given that some consumers prefer non-verbal methods.
* Consumer communications should not move solely online as many consumers prefer to communicate face-to-face, which could be the only means of communication for non-digitally active consumers.
* Industry should provide a greater choice of communications support to secure better experiences for consumers with specific communications requirements. For example, greater choice for consumers who rely on text and/or video relay.
* Translators are different to interpreters and the distinction should be clearly outlined.
* When developing consumer-facing information, providers should consider language competency levels and consider using use a rich mix of pictures, gestures, facial expression, symbols, speech and writing. The Scottish Health Council conducted a survey on inclusive communications to understand people’s communications requirements.[[3]](#footnote-3)
* A common misconception is that BSL users can read English and/or Welsh, but these languages do not follow the same grammatical structure. NB: In 2003, BSL was formally recognised as a language but organisations are not required by law to provide materials in BSL – this is currently done on a goodwill basis.
* If a product is accessible and meets specified accessibility requirements, this does not necessarily mean that it’s usable. It is vital that providers engage with people with a range of access requirements directly about changes to products and services in order to ensure they have the correct measures in place.
* Providers should seek input from consumers during product development stages to ensure that products are inclusively designed. It was noted that providers could work with organisations who recruit consumer panels to test products and services. Diverse user experience testing should form part of their equality impact assessments.
* Information on consumers’ experiences of how well providers met their accessibility and usability requirements should be widely available.
* Many older consumers are not familiar with new user interfaces; and people with progressive illnesses can forget existing digital skills, only recognising old interfaces. Organisations should seek to ensure that user interfaces are ‘dementia friendly’.
* Many people do not have the capability to engage digitally e.g. limited digital skills or lack the digital infrastructure to access communications. Organisations need to provide digital support to ensure consumers can participate safely online.

**Some stakeholder inputs fell outside of the scope of the think-piece (outlined below). While these inputs didn’t feed directly into the think-piece, they do provide useful insights for other sectors.**

* Some communications platforms/technologies are not as intuitive or accessible as others; and lack functionalities that promote inclusivity e.g. lack of simultaneous translation and/or the ability to host a private chat during a virtual meeting.
* TV user interfaces should be accessible and controls to initiate or personalise access services easy to locate.
* In broadcasting, Welsh language speakers can face barriers to engagement e.g. being unable to access subtitles.

**Stakeholders who contributed to the discussions are listed below.**

* **Advice Direct Scotland**
* **Advice NI**
* **Age Scotland**
* **Age UK**
* **The Alliance**
* **Alzheimer’s Society**
* **Citizens Advice Scotland**
* **Competition and Markets Authority**
* **Consumer Council for Northern Ireland**
* **COSLA**
* **Countryside Alliance**
* **deafscotland**
* **Department of Agriculture, Environment and Rural Affairs**
* **Digital Health and Care Wales**
* **Disability Equality Scotland**
* **Disability Wales**
* **Essential Services Access Network**
* **Farmers’ Union Wales**
* **Federation of Small Businesses**
* **HfT**
* **Includem**
* **Independent consumer representatives**
* **Mencap**
* **Mind**
* **Money Advice Pensions Service**
* **Money and Mental Health Policy Institute**
* **National Association of Deafened People**
* **National Federation of the Blind**
* **NFU**
* **Northern Ireland Council for Voluntary Action**
* **Northern Ireland Trading Standards Service**
* **Ofcom**
* **Ofcom’s Advisory Committees**
* **Older People’s Commissioner for Wales**
* **Research Institute for Disabled Consumers**
* **RNIB**
* **Royal College of Speech and Language therapists**
* **The Rural Community Network**
* **Rural Health and Care Wales**
* **Scottish Government**
* **Society of Chief Officers of Trading Standards in Scotland**
* **Supporting Communities**
* **Ulster Farmers’ Union**
* **Wales Cooperative Centre**
* **Wales Council for Deaf People**
* **Wavelength**
* **Welsh Government**
* **Which?**

**For links to research and insights shared by participants across the Hubs – please see below.**

* **Older People’s Commissioner for Wales:** Report on the portrayal of older people in news media - [click here to view](https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.olderpeoplewales.com%2Fen%2FPublications%2Fpub-story%2F21-06-10%2FCommissioner_finds_that_over_two-thirds_of_news_stories_portray_older_people_in_a_negative_light.aspx&data=04%7C01%7CChloe.Newbold%40ofcom.org.uk%7C67d3eb6c5e624a8b1e2308d935961cd7%7C0af648de310c40688ae4f9418bae24cc%7C0%7C0%7C637599741107705947%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C1000&sdata=DOhbp5rydI6Gdp3l6UqPnF4enTvngyuSLaou2zsi2To%3D&reserved=0).
* **Money Advice and Pensions Service:** Money helper site: <https://www.moneyhelper.org.uk/>
* **Ericsson report:** [Seniors and technology during Covid-19: the latest insights - click here to view.](https://www.ericsson.com/en/blog/2021/1/seniors-and-technology-during-covid)
* **Money Advice Trust:** [Vulnerability: Inclusion Handbook - click here to view](https://www.moneyadvicetrust.org/media/documents/100_01466_VULNERABILITY_HANDBOOK_EXTERNAL_015.pdf)
* **Click Away Pound report 2019:** [click here to view](http://www.clickawaypound.com/).
* **RiDC:** [Our recommendations: smart central heating control apps - click here to view](https://www.ridc.org.uk/features-reviews/home/central-heating/our-recommendations-smart-central-heating-control-apps)
* **RNIB:** [Living with Sight Loss in Lockdown in the UK](https://www.rnib.org.uk/professionals/knowledge-and-research-hub/research-reports/general-research)
* **Age Scotland:** [New study reveals "lockdown loneliness epidemic" with more than 200,000 lonely older people in Scotland](https://www.ageuk.org.uk/scotland/latest-news/2021/june/new-study-reveals-lockdown-loneliness-epidemic-with-more-than-200000-lonely-older-people-in-scotland/)
* **Ericsson report**: [Seniors and technology during Covid-19: the latest insights - click here to view.](https://www.ericsson.com/en/blog/2021/1/seniors-and-technology-during-covid)
* **Citizens Advice Scotland research:** [Delivering for all: How vulnerable groups access post in Scotland | Citizens Advice Scotland (cas.org.uk)](https://www.cas.org.uk/publications/delivering-all-how-vulnerable-groups-access-post-scotland)
* **Which?** broadband survey: [click here to view.](https://www.which.co.uk/reviews/broadband/article/best-broadband-providers-aIIx34f51krz)
* **Communication Access UK:** <https://communication-access.co.uk/>
* **Euan’s Guide:** <https://www.euansguide.com/>
* **Scottish Health Council:** [Survey findings on HIV awareness, mental health and wellbeing and inclusive communication](https://www.hisengage.scot/media/1165/fourth_citizens_panel_report_may18.pdf)

**For more information on previous discussions across the Panel’s National Hubs – please see below.**

* In May, we held our first UK-wide Hub, bringing together consumer representatives across each of the UK Nations to discuss**the potential impacts of migration to voice-over IP on consumers, citizens and micro-businesses.** [Please click here to read a summary of our discussions and see who took part.](https://www.communicationsconsumerpanel.org.uk/downloads/ccp-acod-uk-wide-hub-summary---migration-to-voice-over-ip.docx)
* In April, our discussions focused on **digital inclusion, skills and confidence; and the importance of equipping consumers, citizens and micro-businesses with the necessary tools to participate digitally**. [Please click here to read a summary of our discussions](https://www.communicationsconsumerpanel.org.uk/downloads/ccp-acod-national-hubs-summary---digital-inclusion-confidence-and-skills.docx), including the key messages and a list of stakeholders who took part.
* In January and February 2021, our discussions focused on the **affordability of communications services and consumer debt -**[please click here to read a summary of our discussions](https://www.communicationsconsumerpanel.org.uk/.well-known/the-panels-national-hubs---affordability-of-communications-services-and-debt-(summary).docx). The summary outlines the key messages that emerged from our discussions and includes a list of stakeholders who took part.
* In September and October 2020, participants discussed**rural connectivity and the types of issues and impacts that communications consumers living, studying or working in rural areas face -** [please click here to read a summary of our discussions.](https://www.communicationsconsumerpanel.org.uk/downloads/summary-of-the-panels-national-hubs---rural-connectivity-(including-intro).docx) The summary includes a list of stakeholders who took part and further information on available connectivity initiatives across the Nations.
* In December 2020, the Panel published research on **scams and fraudulent activity, exploring how consumers have been targeted across communications channels**. Our discussions with Hub participants on the impacts of scams on consumers, citizens and micro-businesses fed into our research recommendations. [Click here to access our cover report, recommendations and full research findings.](https://www.communicationsconsumerpanel.org.uk/research-and-reports/scammed-exploited-and-afraid-)
* In early 2020, during the initial stages of the Covid-19 pandemic, we discussed **the impacts of the Covid-19 pandemic on communications consumers -**[please click here to read a summary of our discussions.](https://www.communicationsconsumerpanel.org.uk/downloads/ccp-acod-national-hubs---covid-19-consumer-issues-(1).docx)

1. [Ericsson: Seniors and technology during Covid-19: the latest insights](https://www.ericsson.com/en/blog/2021/1/seniors-and-technology-during-covid) [↑](#footnote-ref-1)
2. [Ofcom: Broadband customers to save millions following Ofcom review](https://www.ofcom.org.uk/about-ofcom/latest/media/media-releases/2020/broadband-customers-to-save-millions) [↑](#footnote-ref-2)
3. [Scottish Health Council: Our Voice Citizens’ Panel](https://www.hisengage.scot/media/1165/fourth_citizens_panel_report_may18.pdf) [↑](#footnote-ref-3)