

## Communications Consumer Panel and ACOD evidence to Labour's Digital Government Review

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### Introduction

The Communications Consumer Panel and Advisory Committee on Older and Disabled People (ACOD) welcome this opportunity to contribute evidence to Labour's Digital Government Review.

The Panel works to protect and promote people's interests in the communications sector. We are an independent body, established by the Communications Act 2003. The Panel carries out research, provides advice and encourages Ofcom, Government, the EU, industry and others to look at issues through the eyes of consumers, citizens and micro businesses. 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 face many of the same problems as individual consumers. Individual members of the Panel represent the interests of consumers in England, Northern Ireland, Scotland and Wales respectively.

Following the alignment of the Advisory Committee on Older and Disabled People with the Panel, the Panel is more alert than ever to the interests of older and disabled consumers and citizens.

### Comments

The review puts forward questions in relation to the following propositions:

- Access and Skills - Citizens should have access, and the skills they need, to use government digital services.
- Citizen Needs First - The design and production of government digital services should put the interests, abilities and needs of citizens first.
- People-Powered - The development of government digital services will follow a co-production model and be governed by a set of principles designed to ensure that citizens' interests are respected and that services are people-powered.

In the Panel's view, following its work in this area:

- the challenge to increase participation is underestimated;
- meeting the challenge is underfunded; and
- people who remain unable to access online services will suffer increasing detriment if the challenge isn't met.

## Why digital engagement matters

In April 2009, the European Commission noted that “the internet has become a basic utility for homes and businesses in the same way as electricity or water”<sup>1</sup>. In 2010, the Digital Agenda built on this, stating: “As more daily tasks are carried out online...using the internet has become an integral part of daily life for many Europeans”. Referring to those Europeans not online, and the professional ICT skills shortage, the Commission stated that: “these failings are excluding many citizens from the digital society and economy and are holding back the positive impact that ICT can have on productivity growth”<sup>2</sup>.

It is the Panel’s belief that unless fundamental action is taken, the digital divide risks becoming an ever greater digital gulf as the distance increases between those who are online and those who remain firmly anchored in the offline world. We live in an era in which we are seeing many Government services become “digital by default” and where being online is becoming more and more a necessity of life and less and less of an optional extra. An increasing number of commercial services are only available online - or delivered offline in a way that effectively penalises users, through higher cost or lower quality. Those people still functionally offline will be at an increasing disadvantage and risk being left behind in terms of ease, convenience, inclusion, speed and cost. Digital literacy, especially on security matters, is going to be critical.

## Levels of Digital Engagement

Ofcom’s 2013 Communications Market Report highlighted that while home internet access among UK adults stood at 80% in Q1 2013, take-up varied across age, gender and socio-economic group. The biggest differences were between the youngest and eldest age groups: 91% of those aged 16-24 and 25-34 had access to the internet while only 31% of those aged 75 and over had the same<sup>3</sup>. In common with many other industrialised countries, the UK is experiencing a slow-down, almost a plateau, in internet take-up. Out-of-home internet access still remains important for certain groups of people.

While the advantages of online connectivity apply to all groups in the community, they are especially relevant to disabled people, those on a low income and older people - many of whom may be less mobile than younger people. And yet we know that the take-up and participation in the digital world is unequal and levels of use of the internet vary significantly across the population. Older and disabled people, and those in low-income households, are much less likely to use the internet at home. Ofcom’s 2013 research *Disabled consumers’ ownership of communications services* found that for older (65+) less affluent disabled people, internet access levels are at their lowest (23%) which is significantly lower than among non-disabled people of the same age and socio-economic group (37%)<sup>4</sup>. Recent BBC/Go ON UK research has found that 21% of the UK population lack basic digital literacy skills<sup>5</sup>. The potential consequences of this exclusion are serious: for

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<sup>1</sup> [http://ec.europa.eu/information\\_society/newsroom/cf/itemdetail.cfm?item\\_id=4838](http://ec.europa.eu/information_society/newsroom/cf/itemdetail.cfm?item_id=4838)

<sup>2</sup> [http://europa.eu/rapid/press-release\\_MEMO-10-200\\_en.htm?locale=en](http://europa.eu/rapid/press-release_MEMO-10-200_en.htm?locale=en)

<sup>3</sup> [http://stakeholders.ofcom.org.uk/binaries/research/cmr/cmr13/UK\\_4.pdf](http://stakeholders.ofcom.org.uk/binaries/research/cmr/cmr13/UK_4.pdf)

<sup>4</sup> <http://stakeholders.ofcom.org.uk/market-data-research/other/telecoms-research/tce-disabled-13/>

<sup>5</sup> [http://www.bbc.co.uk/learning/overview/assets/bbcmecialiteracy\\_20130930.pdf](http://www.bbc.co.uk/learning/overview/assets/bbcmecialiteracy_20130930.pdf)

individuals, especially those who are more vulnerable; for society; for business; and for the UK economy.

## The Consumer Framework for Digital Participation

In 2010, to help government and others increase the number of people using the internet, the Panel developed the *Consumer Framework for Digital Participation*<sup>6</sup>. The Framework specifically addresses the issue of what consumers themselves have said they need to get online. Targeted at government and industry, the Framework brings together all the different elements that are needed to provide the help and support for people to get online and get the most benefit from the internet. The Framework sets out the citizen and consumer needs that underpin digital participation. It starts with the consumer experience and breaks down the journey that people make in getting online and then enjoying the benefits.

The Framework, which we believe still holds good today, was a key element of the *National Plan for Digital Participation* and was used by the Digital Participation Consortium to help target and prioritise its work. The intention was that, by putting consumers first, the Framework would enable policymakers and service deliverers to:

- **Highlight the particular needs of different groups:** different groups of people need different things to help them get online and get the most out of the internet.
- **Identify gaps and overlaps in current provision:** there are lots of different digital participation projects and initiatives being delivered by many different organisations across the country.
- **Target new provision:** identifying the particular needs of different groups and gaps in current provision, to enable new activity to be targeted in a way that achieves the maximum impact with the available resources.
- **Assess progress:** the Framework can be used to assess progress and evaluate activity and initiatives against how well they meet consumers' needs.

Following its research, the Panel also suggested the following as priorities for action:

- Campaigns to engage friends and family to help people recognise the potential of the internet.
- Embed the personal benefits of getting online in social marketing campaigns, giving examples of unusual ways in which the internet has met people's needs.
- 'Buddy networks', set up by providers of training and support, to give peer-to-peer support. The people delivering this support should have technical knowledge, be patient and enthusiastic and be available throughout the process of getting online and learning how to get the most from the internet.
- Help and advice to help people choose and set up equipment and services; most of the existing support was focused on helping people develop computer and internet skills.
- Signposting to join up the different sources of help and support.

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<sup>6</sup> <http://www.communicationsconsumerpanel.org.uk/downloads/what-we-do/previous-projects/access-and-inclusion/FINAL%20DP%20SUMMARY.pdf>

- More research into the experiences and needs of disabled people; the little research that was available suggested that disabled people had particular problems due to the lack, or high cost, of accessible equipment and software.
- Government action to increase accessibility, through enforcing current accessibility guidelines and including accessibility requirements in all new contracts.
- Offline alternatives to online public service delivery, for those who are unlikely ever to get online.

## The Consumer Framework for Digital Participation



Subsequent research by the Panel in 2011/12, [Bridging the Gap: Sustaining Online Engagement](#)<sup>7</sup>, confirmed that some people's online journeys are long and complex. Starting the journey does not, in itself, guarantee that people will become confident internet users, able to function and interact with services online. Some will continue to need support to overcome challenges and go on to maximise the benefits of being on line. The elements of the Framework categorised as 'to make it work' and 'to enjoy the benefits' appeared to represent the tipping point for many of those we spoke to in our research. But these elements currently appear to attract less attention and resource than

<sup>7</sup> <http://www.communicationsconsumerpanel.org.uk/smartweb/research/bridging-the-gap:-sustaining-online-engagement>

the initial push to get people online. If a user's journey is not supported adequately, so that it is sustained and developed, the initial investment in training may go to waste. The Panel has encouraged Government and providers to continue to use the *Consumer Framework for Digital Participation* to assess progress made and address gaps.

## **Bridging the Gap**

Our 2011/12 research mentioned earlier ([Bridging the Gap: Sustaining Online Engagement](#)) consolidated stakeholders' experiences and learning in supporting online participation among people who are less digitally engaged, and gathered information about supporting people to take the next steps online. Labour's Digital Government Review may find the research findings useful; and drawing on the findings our report detailed the Panel's clear recommendations to Government and others which, for ease of reference, were and remain:

1. For government to be able to maximize growth and fulfil the Digital by Default initiative, there needs to be a clearer and more comprehensive policy on take-up and use of, as well as access to, broadband.
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 to take full advantage of the benefits of the online world.
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. Closer co-ordination between initiatives across the UK, and 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.
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.

## Further key points

We restrict ourselves here to the key points that encapsulate the Panel and ACOD's additional main concerns.

Access to good quality services is vital and in relation to this, in the Panel's view, sub-optimal delivery of communications services as a result of inadequate infrastructure - be it a lack of fast broadband or the absence of mobile voice and/or data coverage - has long since ceased to be a matter of simple irritation for consumers and micro-businesses, and is now an issue of real detriment. Along with the Mobile Infrastructure Project, the Panel has welcomed the 4G coverage obligation of 98% indoor coverage UK wide, and 95% in each Nation by the end of 2017 as tools to increase rural broadband and mobile voice/data coverage. We have encouraged close monitoring of their rollout and efficiency. However there is still some way to go and it is vital that consumers and citizens in the widest sense should not be left behind, left out or left wanting.

Therefore it is one of the Panel's key objectives to continue to engage with Government, Ofcom, BDUK and industry in relation to voice and data infrastructure to help ensure that the needs of consumers and citizens are central to policy making, that delivery of a high quality service experience is consistently achieved and that consumers and citizens are not excluded or deterred from effectively participating in the digital world. It is vital that citizen interests are taken into account in relation to both the provision of infrastructure and quality of experience. Ofcom's May 2013 Broadband Speeds research<sup>8</sup> states that the average download speed in rural locations is 9.9mbps - but this is an average and there are many examples of much poorer performance. Unsurprisingly, Ofcom's Consumer Experience report published in January 2014<sup>9</sup> reports the level of dissatisfaction with broadband speeds amongst consumers in rural areas is almost double the average - 32% v 18%. In the context of any Digital Government Review, we do not believe that this is an acceptable situation.

Ofcom's 2013 Infrastructure Report found that while 8% of all broadband connections in the UK currently operate at less than 2Mbit/s, two thirds of these slow connections are in areas where superfast broadband networks are already available; but approximately 3% of

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<sup>8</sup> <http://stakeholders.ofcom.org.uk/market-data-research/other/telecoms-research/broadband-speeds/broadband-speeds-may2013/>

<sup>9</sup> [http://stakeholders.ofcom.org.uk/binaries/research/consumer-experience/tce-13/TCE\\_Research\\_final.pdf](http://stakeholders.ofcom.org.uk/binaries/research/consumer-experience/tce-13/TCE_Research_final.pdf)

UK households are currently receiving speeds less than 2Mbit/s and do not have the option of switching to superfast broadband.

There are other related factors too - by June 2013, 73% of UK premises were in a postcode served by next generation access networks enabling superfast (30 Mbps or higher). We've welcomed the UK Government's undertaking to extend superfast so that 95% of UK premises will have it by 2017 and to explore with industry solutions to reach 99% of premises by 2018. But 2018 is still four years away and how will citizens and micro-businesses in the last 5% (i.e. those who are not included in the undertaking to extend superfast to 95% of UK premises by 2017) - be affected? We are concerned by the risk that they will, for a long time, remain disadvantaged - and while the percentages may seem relatively low, the absolute numbers are high.

In terms of digital support, we wonder if there is an opportunity to further consolidate and extend the relationship between Job Centres and Benefits Offices and the providers of expert help e.g. UK Online Centres - so that those most in need, and potentially those who are currently most digitally unengaged, can (a) get assistance with what they're there for; and (b) receive encouragement to learn skills to help them in future, so that they can better "do it themselves" along with overcoming general digital reluctance. We would also strongly support the establishment and/or consolidation of comprehensive digital help and free access at locations people use, e.g. schools and colleges open to local citizens after school hours, post offices and libraries under a unified programme of Government digital help for citizens. We believe, too, that there should be a free helpline for users of Government digital services to provide technical as well as specific service support.

Libraries already offer free internet access and have trained staff available to help. The 2011 OXIS Report, *Next Generation Users: The Internet in Britain* showed that access via mobile devices at another person's home or at libraries tended to be more important for people with lower incomes, whereas work and home access were more common among the higher-income groups<sup>10</sup>. The more recent OXIS Report in 2013, *Cultures of the Internet: The Internet in Britain*, found that 10% of all internet users said they use a public library to access the internet. This level of internet usage, across all user-groups, suggests that libraries remain an important route for online access<sup>11</sup>. We note that the Royal National Institute of Blind People (RNIB) argues that the presence of libraries in residential areas is of importance particularly for more vulnerable users as they are often less able to travel, and more likely not to be able to afford IT.

As we have recently noted in our comments on the Department for Culture, Media and Sport and Department for Communities and Local Government's report considering the current structure and role of public libraries, the rapidly changing nature of the delivery of both commercial and government services means that enabling people to interact confidently with these services on-line is more crucial than ever. We believe that libraries have a vital role to play, in conjunction with other locally based agencies as noted above, in supporting and encouraging people who are not fully digitally engaged. They have the potential to deliver a well-supported, safe and sustained learning environment that

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<sup>10</sup> [http://oxis.oii.ox.ac.uk/sites/oxis.oii.ox.ac.uk/files/content/files/publications/oxis2011\\_report.pdf](http://oxis.oii.ox.ac.uk/sites/oxis.oii.ox.ac.uk/files/content/files/publications/oxis2011_report.pdf)

<sup>11</sup> [http://oxis.oii.ox.ac.uk/sites/oxis.oii.ox.ac.uk/files/content/files/publications/OxIS\\_2013.pdf](http://oxis.oii.ox.ac.uk/sites/oxis.oii.ox.ac.uk/files/content/files/publications/OxIS_2013.pdf)

excludes no-one. As society changes, this is more important than ever before, so that we ensure that more vulnerable consumers and citizens are empowered and are not left behind. It would be counter-intuitive not to fully utilise an established infrastructure with trusted and trained staff in this context.

We would also encourage the much greater availability of free public wifi, together with appropriate advice about relevant security. We understand that the *Schools for the Future* programme had hoped to extend free wifi to parents and local citizens but was unable to fulfil this ambition for funding reasons. This appears to us to be an interesting initiative worthy of further investigation.

Our next point is that Government, and its agencies, need to be true exemplars of best practice. Policy development is vital but Government also needs to be seen to be delivering at the highest standard. Users should be at the heart of design principles of web sites and their functionality - so it is essential that design is informed by research that examines what citizens really want/expect from this way of interacting with officialdom and that this is thoroughly user-tested with a range of representative users of the service. This should focus particularly on vulnerable people (in the widest sense) who may have most need but also the most challenges when it comes to managing interactions online. We agree, too, there should be an objective (and citizen-centric) evaluation and prioritisation based on needs. Government needs to show that it is serious about wanting feedback from citizens. Feedback mechanisms - physical or virtual - should be established for Government to listen and respond to. We hope that GDS will be able to work to instil its values and standards around usability and accessibility into all government services as soon as possible.

It is also worth making the point that for the foreseeable future, there will be people unable to go online - and there must be provision to ensure that they are not excluded. We would apply the same right to those who genuinely choose not to go online; assistance must be available, although it should be used to encourage (not cajole) people to participate.

Our third point refers to the need for greater co-ordination and collaboration, and transparency, of existing initiatives. We hope that the actions outlined in the recently published *Government Digital Inclusion Strategy* will help as awareness and understanding of the respective organisations' roles increases. However, whilst it is important that Government supports other organisations, Government must first ensure that its own work embodies best practice; and it should make funding available so that policy statements translate into tangible outcomes. The Social Value Act 2012 provides a basis to encourage investment/shared investment into schemes to make them sustainable and links should also be established to the work of local democracy groups. The transformation of the UK into a leading digital nation with digitally able citizens cannot be achieved without serious commitment - and investment to support it.



In summary therefore, we would encapsulate these additional points as:

#### **Access & Skills**

- A good, robust minimum level of broadband service across the UK
- Digital help in locally-based agencies
- Free internet access provided in public places
- More free wifi available in public places (with appropriate advice about relevant security)
- People should be supported to stay online - not just get online
- A free helpline for users of government digital services

#### **Citizen Needs**

- Government at all levels to lead by example via user led design principles.
- Research into citizen expectations/needs to inform design and usability.
- Establish top class assisted digital support - supportive, encouraging but non-discriminatory

#### **People Powered**

- Clear policy, widely and consistently communicated
- Greater co-ordination and clear ownership of initiatives and activities
- Government should establish feedback mechanisms - via physical and/or virtual groups and listen and respond
- This requires not only clear commitment but also investment