

# Women and Equalities Committee

## Oral evidence: The National Disability Strategy, HC 241

Wednesday 17 May 2023

Ordered by the House of Commons to be published on 17 May 2023.

[Watch the meeting](#)

Members present: Caroline Nokes (Chair); Elliot Colburn and Kate Osborne.

Questions 80 - 113

### Witnesses

**I:** Angela Matthews, Head of Policy and Research at Business Disability Forum; Tammy Jones, Managing Director at Purple; Eric Harris, Director of Inclusive Research at Research Institute for Disabled Consumers and Vivienne Francis, Chief Social Change Officer at The Royal Institute of Blind People.

Written evidence from witnesses:

Business Disability Forum [[NDS0024](#)]



## Examination of witnesses

Witnesses: Angela Matthews, Tammy Jones, Eric Harris and Vivienne Francis.

**Q80 Chair:** Good afternoon, and welcome to this meeting of the Women and Equalities Committee and our inquiry into the National Disability Strategy. This is the third of our oral evidence sessions. Can I thank Eric Harris, the director of inclusive research at the Research Institute for Disabled Consumers, and Vivienne Francis, the chief social change officer at the Royal National Institute of Blind People, who are joining us in person? At present, we also have Angela Matthews, the head of policy and research at Business Disability Forum with us via Zoom, and we are hoping that Tammy Jones, the managing director of Purple, is also about to join us by Zoom. British Sign Language interpretation of this evidence session is available for viewers on parliamentlive.tv; this is available on channel 10 on the programme guide or by using the link published by the side of the video player on this meeting. Subtitles will also be made available for viewers watching the recorded version of this session.

Can I start by thanking you all for joining us this afternoon and for contributing to this inquiry? Members of the Committee will ask you questions in turn, but I am going to start. My first question, which I am going to pose to Angela and then to Vivienne, is about the National Disability Strategy, which we all understand is separate to the disability action plan. Do you feel that the strategy provided the right policies to improve the choice for disabled consumers?

**Angela Matthews:** Hello and thank you for inviting me. We feel that there is a lot of really good stuff in the National Disability Strategy. Together, if each part was fulfilled, that would go a long way in making huge strides to enable disabled people to access more products and services. But it does need every section of the National Disability Strategy to become a reality, because the digital environment, transport, people's homes, how much money they have to spend, and the extra cost of being disabled—all of these things together—matter for how people make their choices about what they buy, and when and how they buy it. We felt that the strategy needed to be delivered as a whole to make these experiences a reality. We felt there was a lot in there that would go a long way to help, but it does need to move strategically together.

**Vivienne Francis:** Thank you for inviting us to give evidence. We feel that the strategy is very broad, and there is a lot in there, as Angela said. Although we welcome it, we do feel that it repurposes existing Government activity to some degree and that it would be good to see more innovation in terms of how that was deployed and executed.

**Q81 Chair:** Angela just suggested that it needed to be done as a whole—that it could not be implemented in a piecemeal way, with some bits of it, but not others, cherry-picked off. Is that how you feel as well?



## HOUSE OF COMMONS

**Vivienne Francis:** Yes, it is taking a holistic approach, but also looking at a social model of disability and really understanding that disability is created or compounded by barriers within society. We think any successful strategy has to address those barriers and how it would overcome them.

Q82 **Chair:** You commented that you felt much of the strategy was repurposing existing Government activity. Sticking with that, is there anything in the action plan that could be delivered short-term—perhaps, again, the repurposing of existing activity—that would actually deliver real change to improve access for disabled people?

**Vivienne Francis:** Yes. Building on what I said about taking that social model of disability, we think that there are core areas where we could see some real and tangible change, hopefully quite quickly, particularly with regard to consumer choice and convenience. That includes looking at making sure there is appropriate guidance in the corporate sector around people accessing goods and services; making sure that the finance sector is regulated, so that banking and finance services are accessible; and working with local authorities to make sure that street design and the built environment are accessible as well. They were the three core areas where we felt we could get some real, tangible, traction.

Q83 **Chair:** We will be asking some questions specifically around financial services later on, so I might come back to you on that.

Angela, when it comes to—I hesitate to use the phrase—“quick wins”—what could the disability action plan do that would see—I hesitate to use the word immediate, but—really fast tangible benefits?

**Angela Matthews:** One of the things that is already in motion that we think will be huge is the disability unit’s work on public perceptions of disability. One of things that is really not looked at when we are looking at disabled people’s experiences of going out—whether that is for leisure, cultural activities, shopping or accessing services, whether over the phone, digitally or in person—is not only the attitudes of the service provider, but the attitudes of other members of the public when they are accessing these products, services or leisure activities. That leads to people thinking, “Actually, is it worth me going out? Could I access this product or experience from within my home, where I am not abused, shouted at or put down in public?” That is a huge, huge thing that we hear from disabled people. In terms of each section of the National Disability Strategy and some of the themes we see being explored in proposals for the disability action plan, there is parking, for example, which is huge, as well as just walking down the street or asking for adjustments—these were all areas where disabled people said, “Actually, I’m not treated well. Service providers aside, it’s the people in the queue with me.”

We work with a lot of disabled employees in our member organisations who said, “That would be amazing, if it is done amazingly, and we want



in on that—we want to be part of shaping that public perceptions campaign. If other people can treat us well, that in itself is going to make a better experience of just being outdoors and in public.” That is one of the things that the disabled people we talk to are looking for. That is in progress, and we want to see how that is going to be developed long term in the disability action plan as well.

**Chair:** Thank you very much. Elliot.

Q84 **Elliot Colburn:** Thank you very much, Chair, and thank you, panel. Tammy, if I could come to you first, for the benefit of those watching this session, could you give us a brief outline of the purple pound—what it is, but also how important it is to the UK economy?

**Tammy Jones:** Absolutely. The purple pound is the defined spending power of a disabled person and their family. Collectively in the UK, it is estimated to be around £274 billion to the economy every year, and that keeps growing. In high street shops, it is around £267 million; in restaurants and pubs, it is £163 million; in supermarkets, it is £500 million; and the online spending power of people with access needs is around £25 billion per year to UK businesses. This is extremely important, especially when you consider that one in four people has a disability, and 40% of households have at least one disabled person. It is extremely important to consider the impact on the economy.

Q85 **Elliot Colburn:** Thank you for that, Tammy, and we would like to come back to you in a bit. If I could come to you next, Eric, given the potential value of the purple pound, as we have just heard, what is preventing some UK businesses from engaging with the purple pound and being more inclusive in their products, in their buildings and in the services they provide?

**Eric Harris:** The engagement by a lot of industry and providers of services and products is limited by the fact that it is often seen that 80% of people do not have a disability. Where change happens fast, disability is considered at the end, not at the start, which bleeds on to the inclusive design session. It is an economic argument as to why disability is not necessarily considered straightaway and in terms of engaging in the purple pound.

Q86 **Elliot Colburn:** Thank you for that, Eric. Vivienne, I wanted to ask, first, whether you had anything to add to that, but also whether there is more that Government and regulators can do to challenge businesses to become more accessible?

**Vivienne Francis:** Yes. Compounding that, this is also a legislative issue. If we look at something like accessible packaging, there is a real grey area around whether it is even covered by the Equality Act. Three quarters of blind and partially sighted people tell us that they have real issues just accessing information on food packaging, for instance, which we all need to access to look at things like allergies and make healthy choices. They are also excluded from making the right economic



choices—from discounts that other shoppers would be able to see quite easily. There is a lack of guidance around areas like accessible packaging, which we are not even sure are covered by the Equality Act. So it is about tightening that up and looking at how we could make sure that this is not just a “nice to have” but that there is compelling guidance that companies have to follow.

**Q87** **Elliot Colburn:** Thank you. You mentioned the Equality Act, which I was going to come on to. You mentioned that it was, I think, confusing or unclear whether the Equality Act actually covers this. Is there any scope for either a private case or an EHRC case to be brought forward to try to bring about that change, or is this better done through primary legislation?

**Vivienne Francis:** We are exploring that at the moment actually, but, as a minimum, we would like to see minimum accessibility requirements on packaging, for instance. It could be done through guidance at the very least.

**Q88** **Elliot Colburn:** Thank you for that. I will come back to you both. Angela, I would like to come to you next to get an idea of how successful, or otherwise, you think the Government's disability and access ambassadors have been.

**Angela Matthews:** The issue with the disability and accessibility ambassadors is that it is very much reliant on the individual ambassador in terms of how successful that sector is and how much improvement it makes. For example, when ambassadors are invited to apply for the role, part of the application is that they tell the Government what their plan is; we believe it should be the other way around. The Government should say, “This is what we expect from ambassadors,” and there should be a consistent framework for what they want them to achieve. That framework should be measurable so that we can understand the impact and the improvement across sectors as a result of the ambassador programme. This would also allow for products and services in those sectors that are represented by ambassadors to move together, rather than having a really inconsistent approach.

We could have a structure or framework whereby, as an off-the-top-of-my-head example, we said to each ambassador in their sector, “This year you have to influence inclusive communication. You have to encourage your sector to undertake an end-to-end customer barrier analysis. And you have to look at the digital or built environment and make sure that you have trained your staff on how to provide adjustments for disabled people.” There should be no more than five things that apply to every one of those sectors, and there should be a framework so that we can measure how that is working.

There also needs to be some kind of feedback, where that programme of ambassadors is feeding back the challenges that sectors have. That would indicate what is stopping improvement. Do we need legislation? Do



we need more guidance? Is it primary legislation that is needed, or are the barriers sector-wide? In that case, as a colleague previously mentioned, there might be a case for an EHRC intervention, if a particular sector shows up as not moving or improving.

We feel that there needs to be a better way of measuring the impact of the ambassadors programme and a more consistent way of saying, "This is what we want you to do." If that does not happen, I am afraid the risk might be that the ambassador programme is a way for business leaders and individuals to get a public profile for themselves. I am not saying that they are not impactful, because some of those leaders really are, and they are doing amazing work, but it must not just be that. The Government needs to say, "Ambassadors, this is what we need you to do. These are the improvements we need." One of the weaknesses, or challenges if you like, is that a term for an ambassador is one year, and some of our research has shown that business change generally takes four years, so within the reporting framework and expectations of the ambassador's role, we need to understand how businesses work and their improvement measures and cycles internally.

**Q89 Elliot Colburn:** Thank you for that. On top of everything you have just said, given, as you say, that business cycles take a lot longer and that change can often take a lot longer, do you think that the voluntary model is a problem? Would it be better if this was an established, fully paid role?

**Angela Matthews:** That is really interesting, because there are pros and cons to that. We should not be paying people to improve accessibility, because there is legislation and there is a business imperative. Our experience at BDF is that businesses, particularly in the private sector, want to get better at this. Aside from the ambassadors programme, which are business leaders, we of course also have ministerial disability champions. What we need to be really clear about is that a voluntary role does not mean diminished responsibility. The role of the ministerial disability champions and these ambassadors is not just nice to have; this stuff must happen if we are to see change in disabled people's lives.

The interesting question is whether these being paid roles increases the profile and therefore the perceived importance of the role people are there to do. Where we want to get to is a place where we do not need named allies, named ambassadors and named champions because disability, inclusion and accessibility are embedded and where, because we have a National Disability Strategy, businesses, Government, and people in public appointments know what to do and how to do it. We see the ambassadors and ministerial disability champions programmes as vehicles to get to not having them because all this becomes embedded—we see them as temporary.

**Q90 Elliot Colburn:** Thank you, Angela. Vivienne, picking up on the last question, I was going to ask whether you felt businesses were doing enough to take disabled people into account when they developed new products and services, but I think it is fair to say that the answer is



probably no. So I will change my question slightly and ask what more they should be doing and what frameworks would be needed to make that a reality?

**Vivienne Francis:** It is about involving blind and partially sighted or disabled people from the outset. I think they are an afterthought, and you can see that playing out across packaging and financial services; in fact, some things are becoming even less accessible. It is about working in partnership with bodies like ours, who understand the needs of their consumers. As I said, we need to be setting minimum guidance, working together to implement that and having the consumer voice. Businesses are very in touch with their customers in terms of the bottom line, but a lot of companies—in a positive shift—are more purpose driven, so let's make that purpose-driven activity more real and involve people at the outset.

Q91 **Elliot Colburn:** Eric, the same question really: assuming that the answer is no and that they are not doing enough, what more should they be doing, or what mechanisms need to be put in place to allow these things to happen?

**Eric Harris:** For companies to take a more active role in designing more accessible products and services, there needs to be a better understanding of where the value of disability lies in the designing of products and services. Often, the value of inclusive design is seen as being in a product or a service that can be used by as many people as possible, and, true, that is the output. If companies see the value of disability in informing the design process and as a resource for design, not a burden on design, you end up with innovative creative solutions to problems that you would not get to otherwise. It is really about putting a different value on disability as something that is changing things for the positive—a process value, rather than an output value, if that made sense.

**Elliot Colburn:** No, that makes perfect sense, thank you very much. Those are all my questions.

**Kate Osborne:** First, if you will allow me, Chair, I would like to send greetings to everyone who is today celebrating the International Day against Homophobia, Biphobia and Transphobia, and I am sure the rest of the Committee wish to do that too.

**Chair:** Absolutely.

Q92 **Kate Osborne:** My questions are on access to goods and services, and my first question is to Tammy and Angela. How have the shopping habits of disabled consumers changed since the pandemic? If there was another lockdown tomorrow—God forbid—could disabled people access essential goods and services? Tammy, do you want to come in first, please?

**Tammy Jones:** Yes, thank you very much. The lockdown and pandemic certainly expedited the digital movement from the face-to-face and in-person consuming of goods. They really changed a lot for consumers





everywhere, but specifically for disabled consumers. What they have done is really shine a light on the challenges and the barriers to accessing even just basic goods and public services online, as things like GP services moved online quite quickly. There has been a disproportionate effect on disabled people. In the last survey we did, we found that around 50% of disabled people are more likely to face barriers to accessing digital and online services than non-disabled people; if you have an impairment, you are three times more likely not to have the skills to access devices and get online. That is a really stark data point, which shows the disproportionate figures and where we find ourselves.

Whilst the pandemic has made things more accessible, because sometimes the built environment can be a challenge for some people with disabilities, what it has done is show that, actually, businesses and organisations are not quite as set up as they thought they were with their online spaces. The last data released, which I think was in 2022, showed that 97.4% of home pages—for all kinds of different products and services—had errors or issues, which clearly shows that there is a case for change and that improvements are needed quite drastically.

**Angela Matthews:** I agree with everything Tammy has said, so I will not repeat it, but just say that I second all of it. Just to pick up on what she said about demand, we very much saw that. We work with a lot of businesses, including shops, retailers and huge supermarkets, and one of the things that was not foreseen, as Tammy said, is that the capability was there, but the sheer demand on that capability was really, really tested, and disabled people felt that.

For those who are digitally active and do have broadband and a device in their own homes, their challenge was actually the availability of slots for delivery after you have done your online shopping, for example. We have since heard from a lot of disabled people that they have bought annual delivery vouchers, just in case covid happens again, because that makes them a priority for the slots. Even if they are not doing online shopping all the time, they have bought that annual delivery pass with their personal independence payments, just to guarantee that, if there was another lockdown or pandemic soon, they are already in the queue.

The issue that that did bring up for disabled people living alone who do not have a lot of disposable income, of course, is that there is a minimum spend threshold that you have to meet with a lot of online deliveries, particularly from supermarkets—you have to spend at least £25 or £30, for example. Some disabled people told us, “I’m a single person. A lot of my food is medicalised; it comes via prescription. So I don’t have £30 of groceries, and I had to spend more to get the delivery because I was isolating and I could not go out because of my disability.”

The other thing that was a challenge during the pandemic was that many disabled people go shopping in groups, with other disabled people, and a trusted person or carer might go with them. Of course, that stopped, so





there was a social element with shopping that was lost for a lot of disabled people during the pandemic as well.

The final thing that I will say is that some of the disabled people who are employees in some of our member organisations have social care support just to help them with things like shopping and putting that shopping away. During the pandemic, part of the Care Act was paused, meaning that local authorities could choose to withdraw carer support if human rights were not breached. For some people, withdrawing access to that carer, who did their shopping for them because they could not do it online or for another reason, did cause a challenge, and, for some, temporary non-access to food and essential items. As I was saying on your first question on the National Disability Strategy, some of these policy areas—for want of a better phrase—are intertwined, and they depend on one another to be in place.

**Kate Osborne:** Vivienne, did you want to come in on that one?

**Vivienne Francis:** We just did some research with blind and partially sighted people, and 68% really want to shop independently, but only 17% feel able to do that. The pandemic has changed our streetscapes; temporary seating that was put outside restaurants in many places has become permanent, creating physical barriers. We have heard that people have difficulty shopping online, but there is also now difficulty shopping in communities, with things like restaurant seating, but also even things like parked cars and A-boards. We also need to look at those barriers to people being able to physically shop in their communities, which has been aggravated by the pandemic.

Q93 **Kate Osborne:** To stay with you, Vivienne, updated figures from Scope tell us that, on average, disabled households with at least one disabled adult or child, need an additional £975 a month to have the same standard of living as non-disabled households. As food prices have doubled in the last year, and with the rise of energy costs, what pressures is the cost of living crisis putting on disabled consumers, and how does that differ from the pressures faced by the wider population?

**Vivienne Francis:** We did some research in April this year, asking blind and partially sighted people about the impact of the cost of living crisis, and we found that 41% were cutting back on leisure and social activities, which compounds isolation issues. Around 12% were particularly hard hit, with those people telling us that they have to make choices between eating or heating. It is definitely affecting people in harrowing ways. Fourteen per cent said that they expect to only just be able to afford their costs over the next six months.

I do not have a particular comparison with the rest of the population—I could provide that afterwards—but we know, in general terms, that blind and partially sighted people or disabled people are struggling even to get into employment because of things like delays to Access to Work. Many of them cannot get off the starting block to earn their own income and



may be living on benefits, and then they are experiencing these additional costs. We know that the existing fault lines—the inequality that existed pre pandemic and pre cost of living crisis—have absolutely been aggravated. I can provide additional stats if you need that quantifying.

**Q94 Kate Osborne:** Do you think the Government are doing enough to support disabled people to meet these increased costs? Could they be doing more?

**Vivienne Francis:** Yes. That is about looking at benefits uplifts. But, also, many blind and partially sighted people and disabled people do want to work, and if we could unblock the issues that we are seeing in the Access to Work system, more people could get into work, that purple pound would go further in the economy and that might just encourage businesses to take this more seriously.

**Kate Osborne:** Eric, did you want to come in on that?

**Eric Harris:** I did. We, like yourselves, Vivienne, have recently completed research as part of the Financial Fairness Trust work by abrdn; we are reporting on this tomorrow, and I think there will be parliamentary presence in the roundtable from the Cabinet Office disability unit. Not to steal all of their thunder, but one of the headline statistics was that 27% of disabled people are in serious financial difficulty at the moment, compared to 17% of the general population, so we have a direct comparison. We also found that 12% are receiving food support of one sort or another, and of course the major pulls on their purse are things like care and equipment costs, transport and hospital visiting.

Something that is not really discussed a lot, but that is really impactful for disabled people, is the time everything takes, which is a cost in itself. In terms of the time it takes just to go to the shops if you are in a wheelchair—taking the hoist out, transferring into the wheelchair, opening packaging, as was discussed earlier—everything takes so much longer. If you are taking longer dealing with your disability, that is time that you are not spending getting on with your life and doing more productive things.

**Q95 Kate Osborne:** Vivienne, you mentioned the issues around tables outside and so on. We have had a shift to online shopping. Is there a further risk, beyond what you have already identified, that retailers and local councils do not pay sufficient attention to making the built environment more accessible? What would you like supermarkets or retail outlets to implement to make them more accessible?

**Vivienne Francis:** A lot more could be done, and some of it could be quite simple. We would like the Government to ban pavement parking, for instance. We would like to work in partnership with the Department for Transport, the Department for Levelling Up, Housing and Communities and local government to have a proper, full public consultation to update



things like the traffic signs manual, the national design guide and the national planning policy framework and to put in place guidance that could protect people and enable them to enjoy their communities like everybody else. We would also like Active Travel England to create design guidance for local authorities. RNIB are having success with individual councils where we are able to persuade them to be inclusive in their design, but that is on a council-by-council basis. Having real, updated guidance that everybody had to follow and that included the factors we have talked would be really helpful.

**Angela Matthews:** There is a more existential threat to high streets; it is not just about making local branches of banks, post offices, shops or even coffee shops accessible; it is about whether they are going to exist. A lot of the businesses we work with are closing a lot of physical branches because the costs of running them—lighting, heating, rent—are going up. These are all factors that are causing a lot of our members to think, “These branches here, here and here are no longer viable.” Even before we get to, “Is this branch accessible?” a lot of our members are thinking, “Will this branch even be here?” We have to think of the wider economic backdrop as well. If some physical, local branches are not there, that not only causes inaccessibility for some disabled and older people; they will just not have access to those on a very different level.

The other thing I would pick up on—this was quite huge for us, and we worked with RNIB’s policy team on it at the time—is that, during the pandemic, legislation allowed local cafés and restaurants, for example, to put seating, tables and chairs, on the pavements outside. In pedestrianised areas, that is fine, but a lot of local high streets do not have the pavement space for that, and that is an issue for a disabled person who is using a zimmer frame, a wheelchair, a scooter or a mobility aid, whether that is a tetrapod stick or other stick, for example. Some disabled people told us, “We have to go into the road to get around the tables and chairs in the seating areas and then come back on to the pavement, but I can’t do that quickly—I can’t just hop into the road and hop back out of it.” Others just said, “We can’t get through. If there’s a kerb there, we can’t get down it and back up.” That was another area of inaccessibility that legislation allowed to happen.

Q96 **Kate Osborne:** You mentioned rising utilities for businesses and so on, but many disabled people are not aware of the utility providers priority services register. Why do you think this is the case? Do utility providers do enough to make people aware that the register exists?

**Angela Matthews:** Some do, and some do not. Some of it is about language. Some people just do not know what “priority” means. For example, does it mean, “I need something today. Actually, I don’t, but if I did need to access this service in the future, I would need to explain what I need”? Some people would look for “accessibility” in the title of a programme or a scheme; others would look for “disabled”. Some would look for the term “disability”; others do not like having those terms in



## HOUSE OF COMMONS

programmes that are for them. We see that language is complicated and can be a barrier to people signing up for those services, because they just do not know that it is for them. We see that quite a lot.

The other thing we often see is the back-office—for want of a better phrase—capability behind these priority schemes. Some smaller providers have an email address or other accessible options and say, “We will get back to you within two days,” but the accessibility team is much smaller. We find that, if the priority support can be accessed, whatever number you call, that is generally a lot more helpful, and disabled people generally report more satisfaction with those utilities providers.

Disabled people do not always welcome having a “special” line, because they are disabled. They want to access services in the same way as other people do, but they might just need to do that differently. Some people do not feel that they should be accessing a priority or accessibility way of using a service, because if that service was for them, it would be embedded anyway, whatever number they called and however they accessed that service. That said, we also hear that signing up for these schemes in some places really does get people the help they need when they need it.

As a personal example, I am signed up to the priority service of my water provider. I have a liver condition and am reliant on a lot of medication; I have also had two strokes. I am on up to 170 tablets a day, so when my water goes off, that is very, very severe for me. One day, not too long ago, the water company knocked on my door and said, “We are about to turn the water off. We know that you are reliant on a lot of medication. Here are six bottles of water to get you through the next four hours.” They solved my problem before I knew there was one, and they did that because I had signed up to the scheme and said why I had done so. While some people do not like “special” things and different avenues of getting what they need, the reality is, those priority schemes are there to help and get help fast. In my experience, and in that situation, it worked.

**Q97 Chair:** Can I come in on that, Angela? I have been listening intently to your commentary around water particularly. Maybe I should declare my interest here, as I represent an area covered by Southern Water. With priority services schemes, one of the issues that we faced in Southern Water when the water went off in Southampton in both December and February was that people who were signed up for the water company’s priority register were not matched up with the city council’s priority services register. Can you talk to us about the challenges people with disabilities face when your utilities cannot talk to each other, whether that is through GDPR or whether they simply do not talk to each other? How could the systems be simplified, so that if you are signed up with Southern Water’s priority services scheme, the city council also know that you should be on a priority scheme, and SSE do for your electricity?

**Angela Matthews:** That is such an important point. Thank you so much for the question. Being a data geek myself, I read all these clauses and



GDPR things when I sign up for anything. At the end of the day, it is often private companies who are operating these schemes, so these are not public records, they are not NHS records and they are not even health records. It is a voluntary scheme, usually operated by a private sector organisation, who are just trying to give the best service possible. When you look at a lot of the data protection sentences or information, where they ask, "Would you like to sign up for this scheme?" they do say, "We will not share your data with anyone else. It is just for the purpose of our own scheme."

As you said, disabled people find they have to sign up to a lot of stuff to get what they need. One of the reasons your question is so critically important for disabled people's lives in the UK is that, of course, the problem is a lot wider than this. During the pandemic, the Government had no way of knowing who was shielding or who should be shielding. They had no way of finding out who was clinically extremely vulnerable and who had carers, so that they could prioritise them to get PPE and keep providing care to disabled people.

One of the things that we spoke to the disability unit about was whether, in the future, maybe as part of the disability action plan—this is something that BDF will be putting in our submission to the disability action plan—there needs to be some way for the Government, at central level, to know who needs help, and what type of help, in a crisis and how they can get it. It might be a health crisis such as a pandemic, it might be an environmental or a climate situation, or it might be a severe water situation, like you said, but if we are going to make sure that people are not reliant on signing up to 100 different schemes just to be safe and well, we need to know who needs what if x happens.

I know there were mixed feelings about the recent test of the emergency alert to phones, and I completely understand that it will not work for everyone, but we have been looking at whether there could be a database or something around that. The Government are clearly looking at notifying people of an emergency or crisis situation, and we think the next step is to know who needs what. There is also the huge issue of how to accessibly and safely remove older or disabled people who are in acute flooding situations. The question is so important, and we will be putting it in our disability action plan submission here at BDF.

**Q98** **Kate Osborne:** Thanks, Angela. I am not sure how successful the emergency phone alert was—I know that mine did not go off, for whatever reason.

Eric, can I ask you the same question: do you believe that people are aware of the priority services? Do you think the utility companies are doing enough?

**Eric Harris:** The majority are not aware of PSRs. I would echo pretty much everything that Angela has just said. It is not a joined-up landscape out there. Electricity, water, and even internet—broadband—



providers all call these registers by slightly different names. They do not communicate with each other. There is clearly an advantage in being on some of these registers, because, as pointed out and as we have found out in our research in the past, people get served very well, but disclosure is quite an emotive topic for people with disabilities. Not everybody likes to be labelled in one way or another, or to have to be labelled in order to get that service. I am really just reiterating what has been said earlier.

**Q99 Elliot Colburn:** To come back to you, Vivienne, could you outline why you think the digital divide between disabled and non-disabled people exists, and what the main drivers are? Do you think it is getting better or worse?

**Vivienne Francis:** We think it is getting worse. It is certainly not getting any better. Blind and partially sighted people, in particular, need a screen reader to be able to access content online. Screen readers can be around £800, minimum, to purchase, and you have to update the software every year, so there is a financial barrier. Even when people do have access to a screen reader, many websites are just not compatible with them and are therefore not accessible. Things like graphics and moving carousels are really difficult for blind and partially sighted people to understand and access. Obviously, it makes online shopping difficult as well.

With some of the new security measures that are coming in—capture codes or two-factor authentication are designed to protect people, but thought has not been given from the beginning to how they could be inclusive for everybody—we would like to see guidance that corporate companies, in particular, have to adhere to in terms of delivering accessible websites, just like the public sector do. At RNIB, we are working with different companies, but it is one company at a time, and we would really like to see some proper guidance that means everybody has to have an accessible website.

**Q100 Elliot Colburn:** Eric, I put the same question to you. To flesh it out and add to what Vivienne was saying, why do you think the accessibility standards across private sector websites and mobile apps, for example, are so inconsistent?

**Eric Harris:** There is guidance out there with WCAG 2.1 AA that, if followed, would resolve a lot of problems communicated with assistive technologies. Part of that guidance also suggests that people ought to be doing user testing rather than just web-crawling a website to come up with reels and reels of faults on codes that do not have tags, which means the verification windows or the calendars do not work for assistive technology.

People follow the guidance but do not do the user testing, because you can get very good scores on your websites with the web-crawling towards WCAG 2.1, but when you do the user testing, it comes up with completely different problems. Often that is to do with the integrated way that





## HOUSE OF COMMONS

websites work. They work on a platform, on a browser or on a piece of hardware that is sat on some other cloud-based service. At each point, the systems are interfaced rather than integrated.

There is a role for larger IT companies to be involved in designing more integrated rather than interfaced tools, because there are lots of tools out there that you can plug into your computers to make them more accessible, but they do not always work; they are not integrated. The other point to make is that technology does not stop developing. Today's technology resolved a lot of problems from before, but now different problems present themselves.

Q101 **Elliot Colburn:** Thank you, Eric. Tammy, I put the same question to you. To just add to it, there are obviously web accessibility regulations for public sector websites. Do you think it would be helpful to extend these to private sector websites as well?

**Tammy Jones:** Yes, absolutely, I think that would be a great start. In terms of the corporate world, the biggest barriers to adopting minimal accessibility expectations online are usually lack of clear ownership within the organisation, lack of the right people or the right skills, and finding it hard to justify the spend. Some organisations, despite how large they are, are not sure what accessibility really means. An extension of that is sometimes that senior leadership are not convinced of the benefits of it. So I do think a culture change is needed within big corporate organisations to embed accessibility into their practices, websites and so on.

To go one step further—again, this speaks to the point around the priority lists and how different companies responded to these things during the pandemic—a lot can be done around reflecting the diversification of their customer base within their workforce. That is something that is not always highlighted, but it has been shown time and time again to be beneficial. If an organisation truly reflects its customer base within its staff and workforce, and within its culture, generally they have a better level of service, and disabled people will tend to be more loyal to those kinds of organisations and brands, because they see themselves reflected there.

It is twofold. Senior leadership and exec boards need to make accessibility a priority, and it really should be a priority. From there, processes can be embedded into organisational culture. Then at the front end, in their recruitment practices and the retention of a diverse workforce, more can and should be done to make things visible by publishing figures, in the same way the gender pay gap figures are published, as a minimum expectation. You can rest assured that you would see a lot more buy-in quite quickly if these things were made public. If you were an organisation above a certain size and were expected to publish your accessibility figures and your website accessibility, I can imagine that that would have quite a prompt improvement.



**Elliot Colburn:** Thank you very much, Tammy. Thank you, Chair.

Q102 **Chair:** Tammy, I am going to come straight back to you. That is a really interesting point about being required to publish accessibility figures. I am going to move on to talk about banking services specifically. I was at an event yesterday with Lloyds Bank, who were talking about the steps they have taken to make their banking services more accessible. The point they made is that it is very hard to know who is not even trying to access you as a customer because there is a perceived barrier there. I was pushing them on what steps they were taking to inform disabled people of the services that they have and how accessible those are. Can you talk us through how publishing might help and encourage others to do better?

**Tammy Jones:** As with the utility companies, an organisation the size of Lloyds is at the mercy of their shareholders, and the expectation of shareholders is to ensure that things are published and transparent. It does not have to be particularly detailed, because, again, as Eric said, there are lots of different levels and nuances to accessibility and inclusivity. The last bit of data that I saw, quite recently, was that, on around 86% of big corporate websites, the contrast is not appropriate, which makes it almost impossible for some people with visual impairments to navigate them. If you were a large corporate and expected to publish that your services were inclusive by way of your website design, your portals or your customer service functions online, such as your chats and those kinds of things, this brings into sharp focus those who are doing really well—there will obviously be some who are very progressive and are making strides—and highlight those that are doing next to nothing to address the issue. That gives this a voice, and shareholders expect a lot more than previously. Since covid, and especially now with the cost of living, people expect there to be true value in an organisation, and publishing stats like that, and making them comparative in terms of an organisation's size and maybe their sector, would be great. Again, it would give disabled people the ability to have a better choice over who they want to spend their money with, bank with or have their utilities with if they can see them compared to others in terms of inclusivity and accessibility.

Q103 **Chair:** Vivienne, let me turn to you. Tammy mentioned contrast on websites, which is an important feature for people who have visual impairment. Tammy just gave us the stat that 86% of big corporates do not have appropriate contrast. Can you give us some sort of indication of how many have accessible sites where you can even change the contrast? Is that widely available or not?

**Vivienne Francis:** I would need to check that.

**Chair:** You can come back to us at any time with any additional information. The same goes for all of the witnesses; if there is anything else you want to feed in in writing, please do.



## HOUSE OF COMMONS

**Vivienne Francis:** I would say it is not widely available, but I would need to look into how easy it would be for people to do that.

Q104 **Chair:** Thank you. Could you talk to us a bit about accessibility of bank branches and what the challenges are there? Might some disabled people find it easier to access their banking services online rather than in branches? Is there possibly a benefit from that? Has there been a marrying up of branches closing and the web offer being improved and made more accessible, or has there not?

**Vivienne Francis:** Only 44% of blind and partially sighted people feel that they can manage their money independently. They are telling us that they feel designed out of financial services in a number of different ways. With things like bank cards and ATMs, some banks are phasing out embossing of cards and having tactile ATM buttons, and are also not even having the audible services that can help people. That means that people have to ask for assistance, which obviously leaves them open to financial abuse as well. If people are not easily able to identify in their wallet which is their bank card, we would also like to see cash retained. Moving to a cashless society would be really difficult for blind and partially sighted people, because cash has actually become quite accessible. It has tactile indicators.

**Chair:** It has different shapes and sizes.

**Vivienne Francis:** Yes. As that gets phased out and everything becomes more digital, and cards are not even embossed, that is creating additional problems for people.

Q105 **Chair:** I assume the RNIB has done some work on this. I speak as somebody who has an unembossed bank card, which looks, to be quite frank, more like a hotel key card than anything else. Was it a security feature? Why has that happened? Why has there been a change to unembossed cards? What representations have you made to the banking sector?

**Vivienne Francis:** I think it is actually a style issue. We are engaging with financial services. Going back to the Equality Act, we would really like to see people fulfil their duty to make reasonable adjustments and to make sure that, when they are manufacturing cards and ATMs—the whole piece—that they are accessible to everybody.

In answer to your original question, we are finding that blind and partially sighted people are finding these things difficult, given how exposed they are digitally and, as I said, that they do not always even have software that is compatible with online services. They are reliant on being able to go into a branch, which does protect them if they need it. There are a whole range of issues across the financial services sector that we are engaging with them on. In particular, like I said, we would like to enforce what is already in the Equality Act to ensure that all these things are considered.



Q106 **Chair:** We have a wonderful quote from a focus group stating that blind and partially sighted people are not even using the audible services on ATMs, because they “can’t find the headphone jack,” which seems really basic, doesn’t it? What more could be done? Technology is ruling—I was about to say ruining—our lives at the moment. Technology can provide some of the answers, so why isn’t it? Is it because providers do not recognise Tammy’s stunning figure of £274 billion?

**Vivienne Francis:** I think so. It all keeps going back to inclusion not being thought about when things are being designed and to people not thinking about how broader trends like pandemics and digital revolutions might affect different groups. We would like to see people fulfilling their duty around the legislation, but also to make sure that banking projects are inclusive by design, so that people are considered at the outset. We would also like to see a speedier roll-out of inclusive banking hubs to make sure there is a presence where people can access their money safely.

Q107 **Chair:** Angela, can I turn to you and ask, fundamentally, the same question: how can we best ensure that there is consistent accessibility across financial services?

**Angela Matthews:** As I was listening, I was reminded of 2020 or 2021, when the Government Digital Service consulted on the accessibility of public sector websites and apps. The consultation was about readiness for the public sector in the UK to take on EU regulations and make all public sector websites and apps accessible. We work with both public and private sector businesses, so when we consulted our members on this, I went to both. We felt that the private sector is a huge deliverer of public services, so we went to the private sector, and our members there generally said, “Do you know what? This should apply to us as well. First of all, we want to be attractive—we want to win public sector and Government contracts. But, also, this just makes sense.”

It was generally managers who responded to our BDF consultation on behalf of their organisation. One of the really interesting things that came out of my research was that the private sector had generally been forgotten in legislation. A lot of equalities legislation is public sector, because of the public sector equality duty. Some of the legislation that is coming out about accessibility sees the private and the public sector as distinct and separate, but never has the line between them been more blurred, because the public sector and Government contracts are increasingly relying on these huge private corporates to deliver a lot of services that we rely on every day.

It was really interesting that the private sector said that they are so far behind that they felt this legislation should apply to them, but that they cannot resource it. They have never had the structure. They have never had the legislative drive to convince their senior leaders and board that they need to structure their organisation in a way that is fulfilling compliance, which means they do not have the skills in-house to ask,



## HOUSE OF COMMONS

“Are we WACG 2 or, soon, 3?” They said, “The public sector accessibility regulations should apply to us, but because there has not been a legislative framework that says we must do this, we have a hell of a lot of work to do to convince senior leaders and those more widely in our sector that we should be recruiting the skills for today and tomorrow in our future workforce to make this sustainable.”

Coming back to what Tammy was saying about reporting accessibility measurements, one of the things in this very piece of legislation was that you publish an accessibility statement on your website. Of course, what we got to was a lot of people publishing statements on inaccessible websites, where disabled people could not access them.

Our private sector members are up for this. The Equality Act does not look at sector. The reasonable adjustments duty is not just for the public sector; it is for all sectors. Why do individual regulations—not least the digital regulations that apply to websites and apps—not have the same approach? Our private sector members are up for being included in all legislation. Because the private sector is being commissioned to deliver a lot of public services, they need to be in our legislation moving forward.

**Q108 Chair:** Whilst I appreciate that I have been banging on about my constituency endlessly this afternoon, there is a great company there that has developed an app, Signly, that you can overlay on your website and that will turn your inaccessible content into British Sign Language for people with hearing impairment. Do companies or Government necessarily need to bring in experts, when there are really clever techy people out there who can provide you with the, for want of a better word, widget to just overlay on your own website?

**Angela Matthews:** Is that a question for me, sorry?

**Chair:** Yes, it is, Angela. Should, therefore, Government do that to gov.uk?

**Angela Matthews:** It is a really interesting question about Signly—Recite Me also gets really good feedback from a lot of disabled people that we work with. The issue, as Eric alluded to earlier, is the difference between integration and interfacing, because a lot of these plug-ins are cloud-based. In a lot of the private sector particularly, because of very strict IT security policies, especially in accountancy and finance, cloud-based plug-ins do not work when there are lots of systems at play. Back to Eric’s earlier point, it is easier if website accessibility is designed in from the start. Part of the answer when organisations are commissioning and designing new IT and web contracts is just to have the specs in—“We need an accessible, fully inclusive website”—and then to look for a supplier that can deliver that.

**Q109 Chair:** I will declare my interest: I spent six months as the Minister for the Government Digital Service. During that time, I learned one thing, which is that accessible websites and apps are, in effect, easier to use for



## HOUSE OF COMMONS

everybody who does not have a disability. That is the solution, isn't it? Design inclusivity in from the get-go, and you solve your problem.

**Angela Matthews:** Definitely.

**Chair:** Eric, you wanted to come in.

**Eric Harris:** Options for banking solutions do exist out there. Which? did a survey that we supported about accessibility of banking and financial services. That leads me to believe that there is an awareness gap here, let alone some sort of pressure being put on financial services to use those solutions that do exist out there.

One of the other areas where privatisation has happened, yet it is governed by a regulator, is the travel industry. If you think about TOCs—train operating companies—their websites have all been audited by us. The results were given back to the companies, and they saw how well they did or did not do. Maybe there is a role for the financial services industry to run some sort of auditing of their services and do some comparative studies, so that it will encourage them to perform better.

Q110 **Chair:** That goes back to something Tammy said earlier. Is it about, effectively, naming and shaming, having league tables and letting all the different sectors across the entire economy know how they are doing in comparison to their competitors?

**Eric Harris:** It depends on how you frame it. We were very careful in our report not to use that as a stick or a carrot, but none the less, if you read the report and look at the table, you can see the performance differences between the various operators.

**Chair:** Have you seen change?

**Eric Harris:** The report only went out about nine months ago, and a few of the operators have changed notably, but not necessarily in the light of our work. There might have been other issues.

**Chair:** Thank you for that. Kate.

Q111 **Kate Osborne:** Eric, staying on the digital theme and picking up the same points, according to the 2019 Click-Away Pound report, only 7% of disabled people report problems with websites. Why do you think that number is so low? Do you think it is a lack of reporting? Do you think it is a true figure?

**Eric Harris:** I do not know, because we have not researched that question directly. I would imagine that a lot of people with disabilities or disabled people get used to their situation. There is almost an acceptance. It should not be accepted, but it is. Maybe that is at play, but I have no real idea why more people are not complaining. Certainly, when we do research, we hear complaints more than anything. In fact, the majority of user-based research is all about finding the points of pain,





## HOUSE OF COMMONS

what is failing, and trying to use that to improve things. There are lots of complaints.

**Kate Osborne:** Tammy, can I ask you that question as well, please?

**Tammy Jones:** We did some research in 2019, pre pandemic, but at that point, seven in 10 disabled customers said that they would click away from a website that they find difficult to use. I wonder whether, for that 7%, the question has not been framed in the right way or whether the opportunity for them to give true feedback on the accessibility of the website has been captured.

In the work that we do within Purple around the disabled consumer—with the Click-Away Pound, the figure was £11.75 billion—we found that 83% of the people that we surveyed with access needs will limit their shopping to sites they know are accessible. That says that they know quite quickly, or through having to navigate for their particular needs, which websites work for them and which ones are more accessible. Regardless of whether that ends up potentially costing them more money or whatever, they will use those websites instead and stick to them. With those websites that are not accessible, people will tend not to visit them again.

We do not need to name and shame these organisations. There is a case for saying to them that if they were to dedicate some time to this issue and make things quite transparent for the disabled consumer, that would be beneficial. If a disabled consumer can see quite clearly that the website has been redesigned or has been improved for their access, they are more likely to shop there and remain loyal. More needs to be done to capture the true quantity, because I just do not think it is as visible as is being reported.

Q112 **Kate Osborne:** When disabled people find retailers and websites inaccessible and they are unable to shop in person, are there any other alternatives for them?

**Tammy Jones:** This is where the disadvantage becomes very visible. A disabled person has to work harder to find the alternative or the workaround. Sometimes they will have to compromise on the quality of their experience or on what they were intending to procure, purchase or consume. They will have to settle for less. Sometimes there is no workaround, and sometimes it is simply the case that they have missed out, and their experience has been compromised as a result of the physical and online accessibility not being right. The corporates and organisations that are getting on board with this are noticing that more.

Just as an example, e-commerce is more and more the way we shop. In one click, it is our gateway to lots of different products, through the likes of eBay and Amazon. But both of those, as a marketplace that attracts a very large proportion of spend online, are not as accessible. There is a case to say that a truly accessible e-commerce platform is the way forward.



## HOUSE OF COMMONS

Purple are currently working with an organisation called enable.org, who are just about to launch the world's first accessible e-commerce marketplace. All the organisations, including the brands and the retailers that sit behind it, will sign up to confirm that they are truly inclusive and truly accessible, so that when somebody is looking for a truly accessible marketplace, they would access that rather than, say, eBay or Amazon. With innovation like that coming through, hopefully that will encourage providers and organisations to up their game, essentially.

**Q113 Kate Osborne:** My last question is to you, Vivienne. Tammy has touched on some of it there, but what are the health and wellbeing repercussions for disabled people who are not able to access goods online or in person?

**Vivienne Francis:** From our research, blind and partially sighted people are twice as likely as the rest of the population to be digitally excluded, so it is obviously a large number. Some of the ramifications are, as Eric said, that people develop workarounds. If those workarounds are to ask even a friend or a family member to help them buy something online, they are opening themselves up to potential financial abuse; they are taking a leap of faith there. It also gives them less control and choice. When it comes to things like food ordering, people stick with what they know is safe. They are excluded from the rest of the choice, but they are also exposed to risks like ordering something that they are potentially allergic to. Things need to be a lot more inclusive and accessible to avoid some of those pitfalls.

**Chair:** Thank you. Can I take this opportunity to thank all of the witnesses for your evidence this afternoon? As I said earlier, if there is anything you wish to add in writing after the meeting, please do. We will be delighted to hear of either individual experiences or more facts and stats you want to throw at us. In the meantime, it falls upon me to say thank you for your evidence.