

Government Response (September 2023)
House of Lords Communications and Digital Committee
[Digital exclusion and the cost of living](#)

Introduction

The Government thanks the Committee for its report “Digital exclusion and the cost of living” and notes the findings.

We agree with the Committee that digital exclusion is affecting millions of people in the UK and impeding economic growth, productivity and social inclusion. As noted in the Committee’s report, digitally excluded people are less likely to be in well-paying jobs, have worse health outcomes, and overall lower quality of life. As a result, digital exclusion creates new inequalities and exacerbates existing ones, making it difficult to fully participate in society.

The Government has been clear that ensuring that no one is left behind in the digital age is a priority and considers that credible steps have been taken to offer needed support. This includes people who do not have the access, skills, or motivation to use the internet. The UK’s Digital Strategy published in 2022 is clear that HMG has a “vision to enable everyone, from every industry and across the UK, to benefit from all that digital innovation can offer.” Ensuring that everyone across the country is digitally included will also help drive forward our ambition to Level Up the whole of the UK. However, the Government recognises that there is more to be done, particularly in light of the lessons learned from the Covid-19 pandemic and the accelerated pace of digitisation.

The Government's responses to each of the Committee’s recommendations are set out below. We have grouped certain recommendations together to make our response clearer.

General Recommendations

- *The Department for Science, Innovation and Technology should work with the Treasury and external stakeholders to publish (a) an assessment of the likely economic impact of digital exclusion over the next 10 years; and (b) value for money assessments of interventions to narrow the digital divide.*
- *The Government should publish a refreshed digital inclusion strategy within six months of responding to this report. In the meantime it should provide an update on progress against the 2014 strategy objectives in response to this report.*
- *DSIT should establish a cross-government digital exclusion unit. It should have a mandate for co-ordinating external stakeholders and working across departments to embed digital exclusion in priority policy areas, notably economic growth; levelling up; public health; education and skills; and employment and welfare. We further recommend that the Prime Minister’s Office takes a direct interest in tackling digital exclusion and establishes a suitable mechanism to oversee progress on the refreshed digital inclusion strategy.*

Response

Economic assessment (paragraph 44)

Government draws on evidence from a variety of sources including the Office for National Statistics, regulators, and trusted partners and stakeholders from across the sector. Importantly, we seek to use such data and evidence to better understand the impact on day to day lives.

The ONS provides statistics to better understand the outreach, uptake and impact of policies, such as estimates on internet use in the UK by age, sex, disability and geographical location. Ofcom provides evidence and data relating to broadband coverage, attitudes to internet usage and media and digital literacy, advice to consumers on online safety and internet access costs, including social tariffs, and monitors their usage. Reports such as the research on minimum digital living standards in households, are fundamental in helping us prioritise our policy interventions. We use the Lloyds Consumer Digital Index to better understand the nation's digital capability. We monitor and consider external reports such as the report produced by the Centre for Economics and Business Research (Cebr) on behalf of the Good Things Foundation to consider the economic impact of digital inclusion.

As a result, there is a wealth of information accessible to Government. Although we have not developed a rigorous cost/benefit analysis of the economic benefits that considers the pros and cons of a more digitally enabled society, we make full use of external expertise such as the Cebr report, which demonstrate that there are significant benefits to be gained, for instance:

- Total NHS savings of £899 million over the appraisal period, through reducing in-person GP appointments.
- Savings to the Government of £1,355 million over the 10-year period in efficiency savings, through usage of online services.
- Cost benefit ratio of 9.48, indicating that for every £1 invested in digital skills training, £9.48 is gained throughout the economy. The associated net present value is £12.2 billion.¹

DSIT will continue to work with Government colleagues and with key external stakeholders from across the sector to better understand the impacts of overcoming digital exclusion and ensure that policy interventions are evidence driven.

DSIT will work with HM Treasury to explore options for funding research to improve the Government's evidence base on digital exclusion.

New strategy (paragraph 62)

The principles underpinning the 2014 digital inclusion strategy continue to inform our current thinking in so far as access, skills, motivation and trust remain key barriers facing digitally excluded people. The Government does not consider digital inclusion as a stand alone issue, but rather something that is considered in all policy areas where applicable.

¹ Good Things Foundation, [The economic impact of digital inclusion in the UK](#), 2022.

As the report highlights, there have been significant improvements in the number of people becoming digitally included in the last decade. In the UK, 92% (49 million) of all adults had recently used the internet in 2020, this compares to 81% of adults in 2012.² Superfast networks³ are available in 97%⁴ of the country and 92% of the UK landmass has access to 4G from at least one operator.⁵

The Government is working to make progress across the board to make sure that modern society and the economy is accessible and usable by everyone, to help improve their lives for the better. Whilst the UK Digital Strategy published last year did not set out a separate digital inclusion strategy, it instead reflected the overnment's approach to the range of aspects that impact this area, such as access, skills, and online safety.

There has been meaningful progress on the 2014 strategy objectives across all of the 4 key barriers identified in the strategy (access, skills, motivation and trust). This response, alongside the written evidence submitted, sets out the progress made against each pillar.

The Government will continue our work to ensure all Departments are considering the needs of people that are digitally excluded in their policymaking. We will set up a dedicated cross-Whitehall ministerial group chaired by the Minister for Tech and Digital Economy. It will include key departments such as Department for Work and Pensions, Department for Education, Department for Culture, Media and Sport, Department for Levelling Up, Housing and Communities, and Cabinet Office. The group will drive progress and accountability on digital inclusion priorities across Government, setting clear objectives, monitoring delivery, and engaging with relevant sector experts to seek input and advice.

Digital exclusion unit (paragraphs 66 and 67)

The broad and cross-cutting nature of digital inclusion policy means that a dedicated unit risks separating inclusion from dedicated policy expertise and diluting Departmental accountability. Our aim is to ensure that digital inclusion remains embedded across every aspect of Government activity, which makes it a challenge for any single unit within Government to be comprehensively responsible for digital inclusion.

However, noting the importance of better coordination, delivery and accountability, the Government will establish a dedicated cross-Whitehall ministerial group chaired by the Minister for Tech and Digital Economy, as set out above.

Affordability Recommendations

1. *We urge internet providers to do more to increase social tariff uptake and review whether their current promotional strategies are delivering results. Ofcom should provide a clearer expectation of what constitutes a social tariff and work with providers, consumer organisations and comparison websites to make it easier for*

² [ONS internet users](#)

³ Broadband connections offering speeds over 30 Mbps.

⁴ Ofcom, '[Connected Nations: Spring 2023 update](#)', 2023

⁵ Ofcom, '[Connected Nations: Spring 2023 update](#)', 2023

customers to compare deals. Ofcom should be empowered to regulate how and where companies advertise social tariffs, and hold them accountable.

- 2. The Government should remove VAT from retail social tariffs and from the wholesale broadband used to provide them. The Government must then work with Ofcom to monitor social tariff prices to ensure these savings are passed on to consumers. Removing VAT may not be enough to lower prices to an affordable level for those on the lowest incomes. Lowering the wholesale price floor for sales of social tariffs is one way to address this. We recommend Ofcom consults on requiring Openreach to offer a wholesale social tariff.*
- 3. We welcome the introduction of alternative voucher and discount schemes. These provide flexible ways to help people afford internet access. The Government should work with industry to explore options for expanding these schemes during cost of living challenges to help wider groups at risk of digital exclusion.*
- 4. We encourage Ofcom to set out options for providing greater certainty to consumers throughout mobile and broadband contract lifetimes. We further encourage Ofcom to review how exit fees are calculated and investigate options for reducing their cost.*
- 5. The Government should lead by example by encouraging public sector organisations to securely wipe, refurbish and donate old devices to digital inclusion device distribution schemes. It should encourage businesses to do likewise.*

Affordability Response

Social Tariffs (paragraph 96)

We welcome the Committee's acknowledgement of progress made in both the availability and awareness of social tariffs.

The Government will continue to work closely with Ofcom and the telecoms industry to ensure the continued market provision of social tariffs to support low income families. Provision continues to improve, with 26 broadband and mobile operators now offering a social tariff (up from just 3 in October 2020) and 85% of consumers can move to an offer with their existing provider. By switching to a social tariff, eligible consumers could save £200 per year on average, which could make a real difference to household finances.

The Committee recommended creating a clearer definition of what constitutes a social tariff. We recognise the potential benefits of a clearer definition, however it is important to recognise that this may, unintentionally, create a standardised product which may not meet the needs of households. Connectivity needs vary between all households including those claiming state benefits, it is therefore important that households have choice in their service. The current social tariffs in the market offer a range of options for consumers, allowing them to choose which speed and which price suits their needs.

The Government accepts more is needed to ensure households are aware of the availability of social tariffs. In November 2022, the Government worked alongside sector stakeholders to launch an awareness campaign via 'Help for Households'. The campaign utilised television, radio as well as print media including posters and leaflets available at GP surgeries, libraries and through DWP work coaches. The Government and Ofcom also

continue to work with industry and call on them to do more to promote their social tariffs to eligible households.

We currently have no plans to provide Ofcom with powers to regulate how and where telecoms companies advertise their products, however On 7 July 2023, Melanie Dawes, Chief Executive of Ofcom, wrote to industry bosses to set out the regulator's expectation that they take practical action to increase awareness.

VAT (paragraphs 102 and 103)

The Government understands that any reduction in prices would be welcomed by those currently struggling with their bills due to the rise in the cost of living, however there are no plans to deviate from the standard VAT rate for retail or wholesale social tariffs.

Exceptions to the standard VAT rate have always been limited by both legal and fiscal considerations, based on clear evidence and considered carefully, as any reduction in one place is likely to result in a rise elsewhere.

We acknowledge and appreciate that a small number of retail providers have publicly stated their intention to pass on any potential VAT reduction, it is important to recognise that they are under no obligation to do so, or to do so in perpetuity. Pricing is ultimately a decision for operators and there is no mechanism for the Government - or Ofcom - to take action should operators fail to pass on a reduction in VAT.

However, the Government keeps taxation policy under review and we remain ready to receive evidence that change is necessary and continue to engage with operators, charities and consumer groups.

Regarding requiring Openreach to offer a wholesale social tariff, Ofcom's current regulatory remit for Openreach is carefully designed to address Significant Market Power and ensure competition. Adding additional requirements into this design, such as allowing an operator with Significant Market Power to lower their prices, may undermine the regulatory remedy as a whole. Additionally, it is reasonable to expect that requiring Openreach to offer a social tariff product will result in them raising the price of their other packages in order to recoup their costs. Therefore, a retail provider may not necessarily be better off overall, and may be unable to pass on any savings through a reduction in the price of its social tariffs.

It is also important to recognise that any move to intervene in wholesale pricing would require Ofcom to re-open the [WFTMR \(Wholesale Fixed Telecoms Market Review\)](#). A core consideration here is the importance of providing stability and certainty to drive investment in the new fibre networks that the UK needs. Therefore any reopening of the WFTMR, outside of the next market review (expected in 2026) is expected to meet a high threshold. In any event, any intervention in wholesale pricing would need to pass several legal tests, and it isn't clear whether an obligation on Openreach to offer wholesale social tariff would pass these tests.

Internet Voucher Schemes (paragraph 105)

The Department for Work and Pensions' Flexible Support Fund (FSF) is a non-recoverable discretionary fund that Jobcentre staff can use to purchase goods or services to supplement mainstream services and tailor support to the needs of eligible claimants in the local area in order to remove barriers to the claimant moving into work.

Work coaches are given flexibility and discretion to make awards from the FSF to enhance the employment prospects of their claimants. If their claimant presents that lack of internet access is a barrier to employment then their Work Coach has discretion to utilise Flexible Support Funds to assist them with their connectivity. Work Coaches will explore all available options, including social tariffs, pre-paid routers with other providers as well as exploring the potential benefits of our partnership with TalkTalk to provide 6 months broadband, to decide which is most suitable for the individual's needs.

It is important to recognise that the partnership with TalkTalk is a commercial arrangement with the Government meeting the cost and making a one-off, upfront payment before bringing the claimant and the provider together. This intervention is designed to address a specific, recognised barrier preventing an applicant from gaining employment and is not available upon request. It is important to note that the FSF can only be used to pay for the costs of removing a job seeker's barriers to work, therefore it cannot be used to address other needs, for example providing connectivity to support children's education, as suggested in the report.

The Department for Work and Pensions is open to working with other providers on their existing broadband scheme as well as engaging with businesses in other sectors of the economy to consider the ways they may innovate to further support those on low incomes.

Mid-contract price rises (paragraph 110)

We understand that price rises at this time are particularly unwelcome, however - as the Committee notes - it is also important to recognise the investment being made by the sector to upgrade this country's critical national infrastructure and deploy gigabit broadband and 5G nationwide.

However, we believe it essential that telecom contracts are transparent, and clauses relating to in-contract price rises and Early Termination Charges are clear.

Protections are in place for consumers in relation to the information they receive at the point of sale. The [Consumer Rights Act 2015](#) (the 'Act') has rules regarding the terms and conditions of contracts entered into with businesses. Under the Act, all terms of written contracts must be fair and transparent, that is: expressed in plain English, intelligible language, easy-to-understand and must be legible to allow consumers to make informed choices.

In June 2022, following Government negotiation, leaders from the UK's largest broadband and mobile companies agreed a set of [public commitments](#) to support their customers during the rise in the cost of living. These commitments include support for those struggling with their bills by establishing payment plans or allowing them to move to cheaper deals without incurring an Early Termination Charge for their current contract. The Government

has remained engaged with the industry on these commitments and would advise anyone concerned about their bills to contact their provider to discuss the help available.

In February 2023, Ofcom announced it was to undertake a review into the transparency of in-contract price rises clauses. Their review is expected to be published at the end of 2023. We look forward to reading their findings.

Regarding the Committee's specific recommendation regarding 'exit fees', Ofcom have rules and guidance in place around how providers should calculate and the basis on which they can impose early termination charges. Ofcom have taken enforcement action in the past where providers had set those charges too high.

Both Government and Ofcom have also been clear that customers looking to switch onto a social tariff should be able to do so seamlessly without incurring an early termination charges.

Affordable devices (paragraph 117)

We agree with the Committee that access to safe and suitable devices is a key barrier facing digitally excluded people. Device donation initiatives are a significant and valuable contribution to supporting people to overcome this obstacle and we commend all organisations taking active steps to do so.

DSIT has explored the option of donating end of life Government devices to digital inclusion device distribution schemes. Significant security and data privacy concerns associated with providing Government devices, even when they are fully wiped, as well as requirements for contractual compliance, prevent DSIT from doing so at this moment in time.

We are aware there are differences in the approach to end of life device recycling across the public sector dependent on existing contractual requirements. We will conduct a substantive review of DSIT's current position to identify a potential roadmap to future donation. We will use the newly established cross-Whitehall ministerial group to encourage other Government Departments and public sector bodies to do the same.

Additionally, DSIT will continue to regularly engage with big tech companies, telecoms providers and device manufacturing companies to encourage and support them to consider device donation and affordability.

Connectivity and Coverage Recommendations

6. *We recommend that Ofcom reviews the adequacy of the Universal Service Obligation and definition of a "decent broadband service", taking into account the potential impact on private and Government investment that would arise from any changes.*
7. *In setting strategic priorities for Ofcom, the Government should prioritise the long-term benefits to consumers of market competition and recognise the benefits to digital inclusion provided by altnets. Ofcom should have regard to the levels of take*

up of full fibre products and the breadth of infrastructure competition when reviewing the state of competition in the telecommunication market.

Connectivity and Coverage Response

Universal Service Obligation (paragraph 126)

The Government recognises the importance of the broadband Universal Service Obligation as a digital safety net for premises who do not have access to a 'decent broadband connection' - providing them with the legal right to request a connection.

Following the announcement of the broadband USO in December 2015 the number of premises unable to access a decent broadband connection has fallen significantly from 2.6 million in 2015, to 1.4 million in 2016 through to 650,000 before fixed wireless access products were allowed.

Since its launch in March 2020, the number of USO eligible premises has reduced further from 189,000 to approximately 54,000 as of January 2023. This includes premises both above and below the £3,400 cost threshold. This has been due to a combination of commercial and Government funded delivery alongside approximately 7,000 premises delivered directly as a result of the broadband USO.

In order to ensure that the broadband USO remains up to date with the current technical standards that are required to achieve the Government's policy objectives, a review trigger was set within the Communications Act. As a result, if it appears to the Secretary of State, on the basis of information published by Ofcom, that at least 75% of UK premises have taken up a Superfast broadband connection, of at least 30mbps, then the Secretary of State must direct Ofcom to carry out a review of the USO.

Any such review would require Ofcom, at a minimum, to review and report to the Secretary of State on whether it would be appropriate for the universal service order to specify a higher minimum download speed.

As of September 2022, 70% of premises had taken up a Superfast connection. The latest figures will be published in December 2023 as part of Ofcom's Connected Nations report.

AltNets (paragraph 136)

The Government recognises the importance of competition in fixed telecoms as a key driver for increasing coverage, as well as improving services and consumer outcomes. Increasing competition and investment is central to our strategy to reach at least 85% coverage by 2025 and nationwide coverage by 2030. In 2019, the Government set out - in our Statement of Strategic Priorities for Ofcom, the need to support market entry and expansion by alternative network operators. Since then, coverage of gigabit-capable networks in the UK has increased to over 76% and there are now over 100 companies investing over £35 billion to build their networks.

The Government works closely with Ofcom to monitor the take-up of gigabit services. We recognise the potential social and economic benefits of the new faster, more reliable, more

resilient network infrastructure currently being deployed nationwide and worked hard to deliver a legislative and regulatory environment that enables fast and efficient deployment. However, while supportive of take up and the merits of gigabit services, it is not the role of Government to sell commercial services to consumers.

Ofcom have taken, or are taking, a number of steps to support retail competition by supporting consumers to more easily navigate the market, including:

- **End-of-Contract Notifications (ECNs):** In February 2020, Ofcom brought in new rules to require providers to issue ECNs which alert consumers to the end of their broadband or mobile deal and their ability to enter into new contracts with their existing provider or others in the market. Ofcom research⁶ suggests that customers recontracting as a result of ECNs save on average £110 per year.
- **One Touch Switching:** In September 2021, Ofcom announced it was to introduce a One-Touch Switching (OTS) into the broadband market. OTS will support consumers to switch more easily between different internet service (ISP) by allowing them to simply sign up to a new provider. The new ISP will then handle the cancellation of the customer's existing service as well as arrange the installation of their broadband connection. The OTS process is not yet in place. However, Ofcom has opened an industry-wide enforcement programme to ensure that providers deliver OTS in accordance with the agreed specifications as quickly as possible, in light of the industry's delays in introducing a functioning process.
- **Supporting consumers to navigate the market:** In March 2023, Ofcom published a consultation⁷ to explore concerns that the rapid innovation in the broadband market in the past 5 years, and the increasing availability of different infrastructure (e.g. Fibre-to-the-Home (FTTH), Fibre-to-the-Cabinet (FTTC), Hybrid Fibre (Coaxial), Fixed Wireless Access (FWA) and Fibre-to-the-Premise (FTTP)) may be confusing to consumers. Ofcom expect to publish the findings of their consultation in the second half of 2023.

The Government will continue to work closely with Ofcom to ensure continued wholesale and retail competition in the market.

Digital Skills Recommendations

8. *The Essential Digital Skills Framework provides a good basis for driving improvements but it is not being used to its full potential. The Department for Education should use it to set basic digital skills targets at different education stages, including for school leavers. Apprenticeships and adult education courses offer further opportunities to test and provide basic skills training for people already enrolled on education programmes. The Department for Education should encourage a consistent cross-government approach to using the Framework.*
9. *The Government should ensure community-level interventions feature prominently in its digital inclusion strategy refresh. This does not mean they need to offer formal qualifications. The Government should work with funders and local authorities to review the criteria and systems for distributing funding for basic skills support to*

⁶ <https://www.ofcom.org.uk/news-centre/2021/telecoms-customers-saving-millions>

⁷ https://www.ofcom.org.uk/__data/assets/pdf_file/0037/254989/broadband-info-condoc.pdf

ensure that smaller organisations are not prevented from accessing the resources needed to deliver local-level interventions.

Digital Skills Response

Essential Digital Skills Framework (paragraph 149)

The Government agrees with the importance the Committee places on basic digital skills. We remain committed to improving the digital capabilities of everyone in the UK so that they can participate actively in life, work and society.

We agree the Essential Digital Skills Framework is an excellent basis to help drive the improvements we all want to see. In terms of our adult essential digital skills offer it has done precisely that. The Department for Education used the Framework as the basis for the new National Standards for Essential Digital Skills (2019) which set out the skills that the qualifications funded under the adult digital statutory entitlement must cover. These National Standards also underpin any essential digital skills training delivered through the T Level Foundation Year. The T Level Foundation Year provides a high-quality route onto T Levels, for students who would benefit from the additional study time and preparation that it will give them before they start their T Level.

The Institute for Apprenticeships and Technical Education have also developed guidance for employers to support the inclusion of digital knowledge and skills across apprenticeship standards and technical education products. This guide builds on the themes found in the Essential Digital Skills Framework.

Computing is a statutory National Curriculum subject from Key Stages 1 to 4 inclusive, it is compulsory in all schools which are required to follow the National Curriculum. Computing ensures that pupils become digitally literate so that they are able to use, express themselves and develop their ideas through information and communication technology, at a level suitable for the future workplace and as active participants in a digital world. To support the teaching of computing and improve participation in the computer science GCSE and A level, the Department has invested over £100m in the National Centre for Computing Education (NCCE). To date, the NCCE has provided subject knowledge training to over 7,900 teachers, equipping them with the subject expertise they need to teach the computer science GCSE and the NCCE also provides the free Teach Computing Curriculum, consisting of over 500 hours of teaching resources across Key Stages 1 to 4.

Government agrees that there should be a consistent approach to using the Essential Digital Skills Framework which represents the digital skills needs of business and digital inclusion stakeholders and reflects the full range of essential digital skills needed to participate actively in life and work.

The Framework has been integral to our essential digital skills reforms, underpinning the development of the national standards which in turn, informed the development of our new qualification offer, consisting of:

- Essential Digital Skills qualifications introduced in August 2020 which are designed to meet the diverse needs of adults with no or low digital skills, reflecting different learning needs, motivations and starting points.

- Digital Functional Skills qualifications will be introduced in August 2023 and will have standardised content and assessment, providing a benchmark of digital skills for employers.

These new high-quality qualifications are available for free to adults with low digital skills, through the digital entitlement; putting essential digital skills on an equal footing with English and maths in the adult education system, as a third basic skill.

Local and community-based interventions (paragraph 160)

Through our skills reforms, we are continuing to ensure we are supporting all learners, including those who need the most support, to progress to more formal learning or employment.

Through the Adult Education Budget we introduced a new legal entitlement in August 2020 for adults to study free high-quality Essential Digital Skills Qualifications (EDSQ) and, from August 2023, new digital Functional Skills Qualifications (FSQ). These qualifications are recognised by employers and provide learners with the essential digital skills they need to participate actively in life, work and society.

The Government recognises that formal qualifications are not appropriate for everyone, which is why we also fund community learning and other non-regulated learning, such as building confidence in essential digital skills, through the Adult Education Budget. Many Local Authorities and other further education providers are already delivering these courses that help equip adults with the essential digital skills they need for work, life and further learning.

From next year, the Adult Skills Fund will have at its heart continued support for both qualification and non-qualification, tailored learning (which includes community learning type provision) so adults can retrain and upskill in the most effective way. We published the Government's response to the Funding and Accountability consultation on 13 July, which provides more detail on the Adult Skills Fund⁸.

Online digital courses are also available for free on the Skills Toolkit. The Toolkit offers a range of courses across digital, adult numeracy, employability and work readiness skills, which have been identified as the skills employers need the most. These courses will help people stay in work or take up new jobs and opportunities.

Additionally, Jobcentre Plus work coach guidance highlights the importance of Essential Digital Skills in helping claimants move into and progress in work. The work coach guidance also provides questions work coaches can ask claimants to understand if the claimant has the EDS skills employers want. When a work coach becomes aware that a claimant does not have EDS, the work coach is able to refer the claimant to digital skills provision.

During the pandemic, online connection not only became important for staying in touch with family and friends, it was vital to the delivery of services by the voluntary and community sector. DCMS invested £34 million in response to COVID-19 as part of the £750m voluntary and community sector funding package to help the sector adapt and innovate, learning a lot about the potential of digital technology to facilitate social connection, especially for hard to

⁸ [Skills for jobs: implementing a new further education funding and accountability system consultation response summary - GOV.UK \(www.gov.uk\)](#)

reach groups. For example, we funded the Good Things Foundation 'Digital Lifeline' - a project getting devices, data and digital skills support to digitally excluded people with learning disabilities in England.

Accessible Services Recommendations

10. *The Government's digital inclusion strategy refresh should include support for place-based in-person initiatives to help those who cannot navigate online access to essential services. This could include boosting the role of libraries, community centres and local amenities as inclusion hubs, in partnership with businesses.*
11. *As part of the strategy refresh, the Government should audit public sector websites for compliance with accessibility standards and regulations. The Government should encourage private sector organisations to adopt website design accessibility standards used by the public sector. This could start with the most significant public-facing services, for example in healthcare, finance and housing.*
12. *The Government should commission a review to understand the extent of predictive analytics in public-facing services, their likely trajectory over the next five years and the effects on digital exclusion policy. In the meantime the Government should require public service providers using predictive analytics to consider the use of data and the impacts on those who are digitally excluded.*

Accessible Services Response

In-person support (paragraph 170)

We recognise the value of place-based in-person initiatives that support people to navigate online access to essential services. We also understand that some people may simply decide that the internet is not for them, and choose not to use it. For individuals without internet access wishing to use public sector websites and online services, assisted digital support - such as help in filling out a form over the telephone - is available. Cabinet Office is setting an example by monitoring the accessibility of all public sector websites to make sure that everyone, including people with disabilities and impairments, can access public services.

We agree that libraries provide vital and valued support to many people who are digitally excluded, either by data or device poverty or by lack of skills, providing a trusted and welcoming environment at the heart of communities, supported by skilled and experienced staff and volunteers. This critical role of public libraries was recognised especially during the pandemic, where libraries were given an exception to lockdown regulations so they could open to allow people to use public PCs and wifi to access essential services.

All public libraries provide free wifi (which was funded by DCMS in 2014/15) and [we know that](#) in around three-quarters of libraries, users access computers and receive staff help to find new jobs on all or most days. Approximately half of libraries said they had seen an increase in requests for digital skills support with almost all others seeing steady demand. They are also involved in initiatives to build digital skills, distribute free data to disadvantaged groups, etc. Their role in helping people to use digital safely was also recognised at the launch of DCMS's online harms White Paper.

[Libraries Deliver: Ambition](#) - the previous public libraries sector strategy, endorsed by both central and local Government - recognised that libraries have the potential to support many Government priorities, including improved digital access and literacy (which was one of the 7 Strategic Outcomes on which the strategy was built). *Ambition* challenged all departments and public sector commissioners to adopt a 'libraries first' approach when considering how to deliver information and services into local communities, to promote this approach to local partners and, vitally, where the public library network is chosen as an effective and efficient method, ensure resources are provided to support this activity.

DCMS will be consulting on a new Government public libraries strategy over the autumn / winter, and will aim to build on the foundations laid by the Ambition document. Baroness Sanderson has been appointed to help develop and inform that strategy and has held specific themed deep dive sessions, including one focussed on digital access and skills attended by library sector representatives but also partners such as Youth Employment UK, Digital Poverty Alliance and Good Things Foundation. Libraries importance to digital access and inclusion has also come up repeatedly in other sessions, highlighting the importance of libraries provisioning digital access at the heart of their communities job seeking, cultural opportunities, health and study resources, and use of wider public services.

This year we also launched the [Know Your Neighbourhood Fund](#), with up to £30 million of funding from the Government and the National Lottery Community Fund to increase volunteering and reduce chronic loneliness in 27 target disadvantaged areas in England. Libraries Connected will be distributing £2.3m to up to 26 library services, with a focus on locally tailored activities according to need, which could include work to address digital exclusion.

The Department for Levelling Up Housing and Communities' Local Digital Fund supported the development of the [Digital Inclusion Toolkit](#) hosted by Leeds City Council, which created a model that any local council can use to create their own digital inclusion programme and now acts as a national resource on how councils can best support individuals to overcome digital exclusion.

The Department's [UK Community Renewal Fund](#) made over £39 million available for projects that could be categorised as digital skills and inclusion. The UK Community Renewal Fund aims to support people and communities most in need across the UK, creating opportunities to trial new approaches and innovative ideas at the local level. The range of projects include support for improving the digital skills for businesses and creating pathways for the unemployed by providing digital skills to return to work.

Example projects include:

- £570,872 awarded to Engage Somerset, which focussed on three rural communities (Chard/Highfield/Glastonbury) to support those facing digital exclusion (including older people and those affected by redundancy) to access employment/training opportunities and lead better connected lives through technology. The project included an innovative social prescribing element and the use of community/digital coaches.

- £616,520 awarded to Discover: Boosting Digital Inclusion in Stoke-on-Trent, the project promotes digital skills and access across the local area amongst the most disadvantaged, disengaged and digitally excluded members of the city.
- £905,724 awarded to Breaking Digital Barriers: A Pathway to Digital Employability for Greater Manchester, the project delivers essential digital skills training in a non-traditional environment within deprived communities, leading to improved skills/employment outcomes. Many residents with no or low essential digital skills are unlikely to access formal training, the project addresses this challenge by providing a seamless community digital skills and support pathway.

In addition, the Local Government Association has an existing digital inclusion network of councils that meets across the year to share ideas on the most up to date digital inclusion initiatives. These councils are working to fix the digital divide and provide versatile offers for residents and staff to grow confidence, increase access to digital platforms and upskill knowledge and tools.

Website accessibility (paragraphs 176 and 177)

The Public Sector Bodies Accessibility Regulations 2018 require most public sector organisations to meet a minimum standard of digital accessibility for websites, intranets, extranets, web published documents and mobile applications (apps).

The Central Digital and Data Office are the policy owners for the regulations and they are monitored by GDS who are responsible for:

- Monitoring the accessibility of a sample of public sector websites and mobile apps
- Helping public sector bodies fix any accessibility issues they find during monitoring - for example by providing guidance or signposting them to training
- Enforcing the requirement for public sector bodies to publish and regularly review accessibility statements

The monitoring has been in place since 2020 and will continue.

As part of the policy paper Transforming for a digital future: 2022 to 2025 roadmap for digital and data: By 2025, at least 50 of the Government's [top 75 identified services](#) will move to a 'great' standard, against a consistent measure of service performance. One of the requirements of the 'great' standard is compliance with the Public Sector Bodies Accessibility Regulations.

The guidance for the Public Sector Bodies Accessibility Regulations and other Government accessibility guidance and related blog posts and some training resources are available publicly and can be freely used by the private sector. The National Disability Strategy of 2021 included a commitment by DCMS to "explore how to improve the accessibility of private sector websites", but that was paused following the judicial review of the consultation process for the strategy.

Predictive analytics (paragraph 183)

The Central Digital and Data Office (CDDO), is responsible for leading the Government Digital and Data function. In this capacity we are closely following the adoption, trajectory and use of emerging technologies in public-facing services. In relation to the recommendation to conduct a review on predictive analytics in public-facing services and its effects on digital exclusion policy:

- CDDO conducts regular reviews and collects data on cross-Government public-facing services. This allows us to understand the extent that emerging technology is adopted and plans for it to be implemented in future.
- We use this information to inform the content of frameworks, guidance and best practice, for service delivery, which we then require departments to follow. This helps to ensure that technology, including predictive analytics and other machine learning, is used appropriately.

In relation to the recommendation to understand impacts of predictive analytics on digital exclusion policy and to require departments to consider the impacts of using certain data to inform it:

- CDDO is already working on frameworks, to ensure that departments have the guidance needed to apply predictive analytics and other emerging technology effectively, in a way which is ethical and avoids exclusion.
- For example, the Government is committed to using the most appropriate and effective way to deliver greater transparency on algorithm-assisted decision making in the public sector. This includes providing information on algorithmic tools and algorithm-assisted decisions in a complete, open, understandable, easily-accessible, and free format.
- The Algorithmic Transparency Recording Standard ([ATRS](#)), developed by CDDO and the Centre for Data Ethics and Innovation (CDEI), provides a standardised way for public bodies to publish information proactively and openly about how and why they are using algorithmic tools in decision-making to ensure all impacts are considered. It has been endorsed by the UK's Data Standards Authority and was recently [recognised by the OECD](#) as best practice.
- Additional safeguards around machine learning tools are also being put in place through the development of guidance by CDDO, for the responsible and ethical use of emerging technology, such as Generative Artificial Intelligence, in Government.
- To ensure that departments are considering this guidance, including how they use data appropriately during its adoption, CDDO requires compliance with its Service Standard and checks this compliance via service assessments. This standard mandates that steps are taken to avoid digital exclusion in service delivery.
- The guidance noted in this response will outline how departments should do this.

These steps will ensure that Government is set up to use predictive analytics and machine learning tools responsibly, with regard to the impact on all users, as they begin to be adopted more widely.