



House of Commons
Women and Equalities
Committee

**Accessibility of products
and services to disabled
people**

Fourth Report of Session 2023–24

*Report, together with formal minutes relating
to the report*

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Women and Equalities Committee

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Summary

Not all businesses consider the needs of disabled consumers from the outset when designing their products and services. Where accessibility is considered, it is often an afterthought. Products and services should be inclusive by design. Not only will this ensure that people with disabilities can access the same products and services as everyone else, but it will also benefit businesses that currently risk missing out on the spending power of disabled households which is estimated to be worth £274 billion per year. The Government should engage with businesses on improving the inclusive design of products and services in their sectors, work with them to overcome barriers businesses may face in achieving inclusive design and publish guidance on best practice.

Website accessibility

Many private sector websites continue to fall short of what is required to make them accessible to disabled consumers. While the public sector must follow specific regulations that require their websites and applications to conform to international web accessibility standards, the private sector does not. The National Disability Strategy, published in July 2021, recognised the poor accessibility of private sector websites but the Government has still not acted on its commitment to address the problem. Given that disabled people increasingly need access to online services and information, the Government should now resolve this as a priority. Private sector websites and applications which provide essential products and services should be subject to the same regulations as the public sector. The Government should work with businesses, the Disability and Access Ambassadors and Disabled People's Organisations (DPOs) to prepare for legislative action across other parts of the private sector.

Bank cards and ATMs

With the introduction of flat bank cards, some disabled people—particularly people who are blind or partially sighted—struggle to conduct financial tasks independently. Although several banks and financial providers have issued debit and credit cards with tactile indicators, this is not standard practice across the banking sector as providers continue to phase out embossed cards. The Financial Conduct Authority should work with the banking sector and organisations such as the RNIB to ensure all banks embrace inclusive design when innovating or phasing out existing services. All banks should provide flat bank cards which are accessible to disabled people, including tactile indicators and a clear visual design.

Inaccessible automated teller machines (ATMs, also known as cash points) can also inhibit disabled people's financial independence, for example by lacking wheelchair access or audio services. All banks and providers of ATMs must ensure all machines have been approved by disabled users, are installed in locations accessible to all and regularly checked so accessible features are in working order.

Accessible food packaging

If food packaging is not accessible to all, visually impaired people can find it difficult to obtain important product information such as nutritional value, cooking instructions, allergens and price information, which limits the items disabled shoppers can buy. The Government should review its food labelling guidance—while considering new technologies and tools such as NaviLens—to ensure a minimum accessibility requirement on food packaging’s essential nutrition, health and pricing information.

Accessibility of products and services to disabled people

1. This is the second report¹ of our inquiry into the National Disability Strategy.² In this report we consider the adequacy of steps the Government is taking to improve the consumer experience of disabled people. We also reflect on the evidence we received on the extent to which businesses take account of the accessibility needs of disabled consumers when designing products and services. Online this may mean ensuring websites can be used by people with impaired vision, motor difficulties, cognitive impairments or learning disabilities, and deafness or impaired hearing. In the physical environment accessibility considerations will include ensuring buildings, services and products are designed or adapted so that they can be used by as many people as possible. Two specific areas in which witnesses raised concerns were the inaccessibility of flat bank cards and information on food packaging, both of which we consider below.

National Disability Strategy and Disability Action Plan

2. The National Disability Strategy—the Government’s long-term plan to improve the everyday lives of disabled people, published in July 2021—contains actions to address some of the common barriers disabled people face when shopping in person and online.³ Notable policies completed or in progress include strengthening guidance to local authorities and other organisations to make high streets more accessible, accelerating the delivery of Changing Places toilets⁴ in existing buildings, driving innovation in assistive technologies, and expanding the Disability and Access Ambassador programme to more sectors. The Government has also said it “believes there is scope to update building regulations guidance to improve accessibility and inclusive design for buildings other than dwellings, subject to consultation”.⁵ However, the Disability Action Plan (see below) did not outline any further information on this.

3. The Disability Action Plan published in February 2024—which is separate to the National Disability Strategy and outlines what the Government will do for the remainder of this Parliament—includes a commitment to “help businesses to understand the needs and deliver improvements for disabled people”.⁶ The Plan requires the Disability Unit,

1 Our first report, *The National Disability Strategy*, was published 6 December 2023. Our third report will focus on the inequalities that people with learning disabilities and autism face.

2 Following a call for evidence, the Committee published 42 written submissions, including evidence from disabled people’s organisations (DPOs); charities; disabled people and carers; the Equality and Human Rights Commission; and other stakeholders such as Trade Union representatives, academics, and professional organisations. The then Secretary of State for Work and Pensions wrote to the Committee on 18 July 2022 to notify MPs that the Government would not submit evidence on the terms of reference, citing an ongoing legal dispute over the strategy and its consultation process. In consultation with Mr Speaker, the Chair waived the sub-judice rules on legal cases to ensure other organisations and individuals could speak freely. The Committee held 4 oral evidence sessions between 29 March and 5 July 2023 with disabled people, DPOs, charities, and the Minister for Disabled People Health and Work, Tom Pursglove MP and the Minister for Mental Health and Women’s Health Strategy, Maria Caulfield MP. In addition the Committee undertook two visits in June 2023: Oslo, Norway, to examine how another country is implementing a disability strategy; and to the Hamelin Trust, a charity for people with learning disabilities, in Billericay, in June 2022 to speak to people with lived experience.

3 Disability Unit, Equality Hub, Department for Work and Pensions, *National Disability Strategy*, CP 512, July 2021

4 Changing Places Toilets enable anyone, regardless of their disability, to go to the shops, attend hospital appointments, enjoy community life, socialise and travel.

5 Disability Unit, Equality Hub, *Disability Action Plan 2023 to 2024: consultation document*, 18 July 2023.

6 Disability Unit, Equality Hub, *Disability Action Plan*, CP 1014, 5 February 2024

which sits in the Cabinet Office’s Equality Hub, to publish research on the accessibility of private sector products and services in spring 2024. It states, “this will provide more information about the accessibility of different sectors (including retail and leisure) and the end-to-end customer journey for disabled people.”⁷ It also commits the Disability Unit to improving its understanding of the barriers disabled consumers face, stating that “once complete, we will be better placed to develop policy options to address the barriers faced by disabled customers and improve customer experiences for disabled people.”⁸

4. Several policies in the National Disability Strategy were paused due to the High Court ruling the strategy unlawful in January 2022 (overturned in July 2023) and are yet to be implemented. Two of those policies were specific to improving consumer choice. The first was establishing an Extra Costs Taskforce by summer 2022—bringing together disabled people, regulators and businesses—to understand the extra costs of being disabled. This objective now appears to be downgraded from a firm commitment to something the Government will explore.⁹

5. The second policy to be paused was a commitment for the then Department for Digital, Culture Media and Sport to build the evidence base on the inaccessibility of private sector websites and to examine the case for legislative action. That commitment remains under review due to machinery of Government changes since the strategy was originally published.¹⁰ As we set out later in this report, the websites of many businesses currently fall short of what is required to make them accessible to disabled consumers.

The purple pound

6. There are an estimated 16 million disabled people in the UK.¹¹ The combined spending power of households with at least one disabled person—known as the purple pound—is worth approximately £274 billion per year to the UK economy.¹² During our inquiry we heard that, by failing to consider accessibility from the outset (inclusive design), businesses were underestimating the potential of the purple pound, resulting in lower revenues for them and limiting the choice available to disabled consumers.

7. A 2020 report by the digital agency Inviqa, based on research with over 100 professionals involved in creating digital products and services in the UK, revealed the most common barriers to inclusive design. Those were a lack of clear ownership within the organisation (43% of respondents), not having the right people or skills (16%) and finding it hard to justify the spend (11%).¹³ The report also found a lack of awareness and understanding within businesses on the scale of access needs: 73% were unable to identify how many people in the UK had a disability or impairment, while 81% were unaware of the value of the purple pound.¹⁴

8. Research has found that most sectors of the economy are losing money each month as a result of being inaccessible to disabled people, with banks or building societies (£935

7 Ibid

8 Ibid

9 Disability Unit, Equality Hub, *Disability Action Plan*, 5 February 2024.

10 [DEP2023-0744](#), 18 September 2023

11 Department for Work and Pensions, *Family Resources Survey: financial year 2021 to 2022* (23 March 2023)

12 Scope, ‘[Accessibility and disability: UK research and statistics](#)’, accessed 21 December 2023

13 Inviqa, *Digital accessibility: achieving great CX for all* (2020) p 14

14 Ibid, p 15

million), supermarkets (£501 million) and high street shops (£267 million) among the worst performing.¹⁵ Vivienne Francis, Chief Social Change Officer at the Royal Institute of Blind People (RNIB), told us that disabled people, particularly those who were blind or partially sighted, “are an afterthought and you can see that playing out across packaging and financial services; in fact, some things [such as bank cards which we consider later], are becoming even less accessible”.¹⁶

9. The Inviqa report found that only 31% of companies had considered accessibility when researching customers’ needs, with just 19% factoring it into decisions on what products to build.¹⁷ Eric Harris, Director of Inclusive Research at the Research Institute for Disabled Consumers, suggested that because most of the population were not registered disabled, businesses did not factor disability into their economic forecasts when bringing a product or service to market. As a result, “disability is considered at the end, not at the start”.¹⁸ Indeed, research has shown that senior decision makers might not prioritise inclusive design due to budgetary and time constraints, even though retrofitting (re-designing) a product could cost more time and money than if accessibility was considered from the start.¹⁹

10. We asked Tammy Jones, Managing Director at Purple—an organisation that works to improve accessibility for disabled consumers—what the alternatives were for disabled people who could not access websites or shop in person. She told us:

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.²⁰

11. We heard that many businesses needed to change their culture in order to benefit from the spending power of disabled people. Tammy Jones told us that “some organisations, despite how large they are, are not sure what accessibility really means.”²¹ She called for senior leaders and executive boards to prioritise accessibility and embed it within their organisation’s practices and culture, such as in the recruitment and retention of a diverse workforce:

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

15 See wearepurple.org.uk, ‘[The Purple Pound - Infographic](#)’, accessed 18 December 2023. The breakdown is estimated as: High street shops—£267 million; restaurants, pubs and clubs—£163 million; supermarkets—£501 million; energy companies—£44 million; phone/internet providers—£49 million; transport providers—£42 million; banks or building societies—£935 million.

16 Q90

17 Inviqa, [Digital accessibility: achieving great CX for all](#) (2020) p 19

18 Q85

19 Mieczkowski, A et al, [Inclusive Design and the Bottom Line: How Can Its Value Be Proven to Decision Makers?](#). In: Stephanidis, C., Antona, M. (eds) [Universal Access in Human-Computer Interaction. Design Methods, Tools, and Interaction Techniques for eInclusion](#) (2013)

20 Q112

21 Q101 [Tammy Jones]

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.²²

12. A 2018 study by consultancy firm Accenture found that firms that championed disability inclusion had higher revenues, net income and profit margins.²³ The value of an inclusive approach by businesses when designing products and services can reach beyond simply increasing the customer base, however, as Eric Harris explained:

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.²⁴

Disability and Access Ambassadors

13. The Government has appointed ‘Disability and Access Ambassadors’ to promote accessibility for disabled consumers and employees in various sectors of the economy.²⁵ Examples of initiatives orchestrated by ambassadors include:

- Increased use of the sunflower lanyard across air, rail and retail services. The sunflower indicates that the wearer has a hidden disability and may need additional support, understanding and time.
- The Access to Insurance Programme which aims to improve consumer access to protection insurance, particularly for those with long-term health conditions and disabilities.
- Proposal for a new Arts Access Card intended to be valid at all arts and cultural venues for seamless, barrier-free booking that is responsive to individual circumstances and needs.²⁶

14. We heard from Angela Matthews, Head of Policy and Research at the Business Disability Forum, however, that the success of the ambassador programme was inconsistent because it depended on individual ambassadors telling the Government what work they wanted to do in their specific sectors rather than a coordinated approach. She suggested that, instead, the Government should provide a “consistent framework for what they want them (ambassadors) to achieve”. This would enable “products and services in those sectors that are represented by ambassadors to move together, rather than having a really inconsistent approach”.²⁷ She explained that ambassadors could then provide vital feedback to the Government on the challenges their sectors faced:

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

22 Q101

23 Accenture, [Getting to equal: the disability inclusion advantage](#) (2018)

24 Q91

25 Disability Unit, [List of Disability and Access Ambassadors](#), 28 July 2021

26 Disability Unit, Equality Hub, Department for Work and Pensions, [National Disability Strategy](#), CP 512, July 2021

27 Q88

barriers sector-wide? In that case, as a colleague previously mentioned, there might be a case for an EHRC (Equality and Human Rights Commission) intervention, if a particular sector shows up as not moving or improving.²⁸

15. **The Disability Action Plan calls on the Disability Unit to publish research into the accessibility of private sector products and services in spring 2024 and to improve its understanding of the barriers disabled consumers face. It is right that policy options should be evidence-based. However, despite the hold ups owing to legal proceedings, it is unacceptable that three years after the publication of the National Disability Strategy, rather than seeing tangible improvements in their lives, disabled consumers are instead left with further delay while waiting for the Government to undertake research, the need for which has long been recognised.**

16. **Not all businesses are considering the needs of disabled consumers when bringing products and services to the market. Where accessibility is considered, it is often done so retrospectively, as something to be bolted on to an existing design. Products and services should be inclusive by default. By not embracing inclusive design, businesses risk missing out on the spending power of disabled consumers and restricting the options available to them.**

17. *The Government should task the Disability and Access Ambassadors with engaging with businesses on inclusive design, to seek out and share best practice and to identify the barriers to making products and services in their sectors accessible to disabled people. The Government should then work with each sector to discuss relevant interventions and develop guidance on best practice.*

18. **Disabled people face additional costs in their daily lives. These costs are exacerbated by restrictions on their choice as consumers. We support the Government's commitment in the National Disability Strategy to establish an Extra Costs Taskforce to better understand the extra costs faced by disabled people, including how this breaks down for different impairments. The Government originally planned to set up the taskforce by summer 2022. We recommend that the Government establish an Extra Costs Taskforce as a priority and by no later than summer 2024.**

Website accessibility

Barriers to access

19. The 2019 Click Away Pound report, which analysed the experiences of people with access needs when shopping online, estimated that 7.15 million disabled internet users in the UK have access needs, an increase of more than 1 million since the first Click Away Pound report in 2016.²⁹ However, the report found that 72% of people with access requirements experienced barriers on more than a quarter of websites they visited for the first time.³⁰ The authors ranked the most common website issues that disabled people faced (see Table 1 below). All respondents with access needs used some form of assistive

28 Ibid

29 Rick Williams and Steve Brownlow, [The Click-Away Pound Report 2019: Revisiting the online shopping experience of customers with disabilities, and the cost to business of ignoring them](#) (February 2020) p 5

30 Ibid, p 14

technology, for example screen readers (52%), screen magnification (27%) and speech recognition software (23%).³¹ Vivienne Francis told us of the issues facing many blind and partially sighted consumers:

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.³²

Table 1: Ranking of most-common website issues faced by all respondents to the Click Away Pound survey (including those using assistive technologies)³³

Website issue	2016	2019
Crowded pages with too much content	67%	66%
reCAPTCHA tests	n/a	63%
Poor link information and navigation	61%	59%
Filling in forms	58%	56%
Poor legibility (colour contrast and text layout)	44%	55%
Distracting moving images and graphics	44%	53%
Poor keyboard access	45%	42%
Poor screen reader access	49%	35%
Other	26%	19%

Source: Rick Williams and Steve Brownlow, The Click-Away Pound Report 2019 (February 2020)

20. Respondents to a 2020 survey by the disability charity Scope reported being “annoyed,” “anxious,” “stressed” and “deflated” when they could not complete a task online due to a website’s inaccessibility.³⁴ Simple tasks—such as shopping, banking and booking cinema tickets—left disabled people feeling “upset,” “angry” and “stupid”. One respondent said they felt “Isolated. Excluded. Alone. Frustrated. Unimportant to society.” Answers to the survey also suggested that badly designed websites made disabled people feel their disability was the problem and “more disabled” as a result.³⁵

21. The coronavirus pandemic and subsequent lockdowns expedited the movement of services from in-person to online. Tammy Jones explained that this has had mixed results for some disabled people:

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.³⁶

22. In 2023, WebAIM, an organisation that examines web accessibility for individuals with disabilities, found that 96% of the 1 million most visited home pages did not meet

31 Ibid p 17

32 Q99

33 Respondents could choose more than one answer. The 2019 survey added reCAPTCHA tests to the list of options for the first time.

34 Scope, [‘Research: frustrated, the ‘F’ word of inaccessibility’](#), accessed 14 February 2024

35 Ibid

36 Q92

accessibility standards.³⁷ For example, 84% of home pages failed to provide low contrast text “which makes it almost impossible for some people with visual impairments to navigate them”.³⁸ The WebAIM study also only focused on automatically detected errors, meaning that the actual conformance level to international Web Content Accessibility Guidelines (WCAG) “was certainly lower.”³⁹

23. WebAIM noted that addressing the most common problems “would significantly improve accessibility across the web”.⁴⁰ Eric Harris agreed that if developers followed WCAG, they could resolve a lot of problems with websites being incompatible with assistive technologies. However, he observed that the guidance also suggested user testing rather than simply web-crawling—automatically browsing a website—to detect faults.⁴¹ While web-crawling might result in good WCAG scores, user testing would highlight different problems often caused by a lack of integration between websites and the assistive tools that disabled people used. Eric Harris continued, “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”.⁴²

24. Several witnesses agreed that it would be easier “if website accessibility is designed from the start” rather than as an add-on at the end of the process.⁴³ Angela Matthews told us that private sector businesses would welcome being subject to the same accessibility standards as the public sector. She argued that without the legislative drive, it was difficult for managers “to convince their senior leaders and board that they need to structure their organisation in a way that is fulfilling compliance”.⁴⁴ She said:

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.⁴⁵

25. Public sector websites in the UK must meet accessibility requirements under the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018.⁴⁶ The accessibility regulations build upon existing obligations to people who have a disability in the Equality Act 2010. Accessibility regulations also cover public sector mobile apps developed for use by the public. Legislation requires public sector bodies to provide and update an accessibility statement on their websites.⁴⁷ Although companies should make reasonable adjustments for disabled people under the Equality Act 2010, unlike the public sector there are no specific regulations that require their websites and applications to conform to international web accessibility standards. The National Disability Strategy

37 WebAIM, [‘The WebAIM Million, The 2023 report on the accessibility of the top 1,000,000 home pages’](#), accessed 14 February 2024

38 Q102 [Tammy Jones]

39 WebAIM, [‘The WebAIM Million, The 2023 report on the accessibility of the top 1,000,000 home pages’](#), accessed 14 February 2024

40 Ibid

41 Q100

42 Ibid

43 Qq100, 108

44 Q107

45 Q107

46 Made Sis: The Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018, [\(2018 No. 952\)](#)

47 Central Digital and Data Office, [Understanding accessibility requirements for public sector bodies](#), 9 May 2018

has recognised the “persistently poor accessibility of private sector websites”.⁴⁸ However, as mentioned earlier in this report, the Government is yet to proceed with its commitment to address the issue.

Loss of revenue

26. Although there may not be a legislative impetus to improve the inclusiveness of website design in the private sector, there is an economic case to do so. The annual online spending power of disabled households to UK businesses is valued at £25 billion.⁴⁹ Businesses are losing out on this potential revenue because their online services are not sufficiently inclusive. The 2019 Click Away Pound report found 69% (4.3 million) of disabled internet users clicked away from websites with accessibility barriers, representing a potentially significant loss of income to those sites.⁵⁰ The report noted 83% of disabled people limited their online consumer choices to websites they knew were accessible.⁵¹ Tammy Jones told us that disabled people:

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.⁵²

27. **Disabled people should not have to look for alternatives or settle for less when using online shopping and services. Despite the untapped potential of the purple pound, market forces have failed to drive the urgent improvements that are necessary.**

28. *Given that disabled people increasingly need access to online services, information, and social networks, it is imperative that the Government acts on what it has described as the “persistently poor accessibility of private sector websites” without further delay. As a priority, private sector websites and applications which provide essential products and services should be subject to the same regulations as the public sector. Concurrently, Ministers should work with businesses, the Disability and Access Ambassadors and Disabled People’s Organisations (DPOs) to lay the ground for legislative action across the other parts of the private sector. The Government should provide an update on its progress on this recommendation within six months of the publication of this report.*

Bank cards and ATMs

29. Disabled people face challenges in accessing banking products and services. In addition to problems associated with website inaccessibility—such as poor colour contrast between text and background and incompatibility with assistive technology—Vivienne Francis told us that many blind and partially sighted people felt “designed out” of financial services in other ways, such as with the introduction of flat bank cards and inaccessible automated teller machines (ATMs).⁵³

48 Disability Unit, Equality Hub, Department for Work and Pensions, *National Disability Strategy*, [CP 512](#), July 2021

49 Scope, [Accessibility and disability: UK research and statistics](#), accessed 29 February 2024

50 Rick Williams and Steve Brownlow, [The Click-Away Pound Report 2019: Revisiting the online shopping experience of customers with disabilities, and the cost to business of ignoring them](#) (February 2020) p 6

51 Ibid

52 Q111

53 Q104

30. Banks are phasing out the use of embossed bank cards—which are no longer necessary for creating carbon copies of bank details—and replacing them with flat cards. The RNIB described how flat bank cards affected many blind and partially sighted people’s ability to conduct financial tasks independently, especially in an increasingly cashless society. For example, without embossing, people struggled to differentiate between their bank card and other cards in their purse or wallet—which could lead to inputting the wrong PIN, having money deducted from the wrong account (when using contactless), and having cards and accounts blocked. All of these might cause confusion, waste time or incur charges.⁵⁴ People were also unable to access important information crucial to making a transaction, such as their account number, sort code, expiry date and CVC number.⁵⁵

31. Various banks and financial providers, such as Mastercard and Visa, have worked with the RNIB “to provide tactile solutions to the problems posed by flat bank cards to blind and partially sighted people”.⁵⁶ For example, some debit and credit cards now have tactile indicators, such as a series of dots and/or notches, so customers can identify by touch the type of card they are using and which way around to insert it into a card machine or ATM. But there is a lack of consistent design across the sector.⁵⁷

32. Inaccessible ATMs can also inhibit disabled people’s financial independence, for example by lacking wheelchair access or audio services.⁵⁸ The RNIB noted that although data from LINK—an organisation that operates the majority of cashpoints in the UK—showed that only 36% of ATMs provided audio assistance, the number could be lower due to a lack of accessibility monitoring.⁵⁹ A 2021 survey by the consumer organisation Which? found some banks lacked reliable data on the accessibility of their ATMs, which risked customers obtaining false information.⁶⁰

33. The RNIB also suggested blind and partially sighted people struggled to access the audio services that did exist because of incompatible software updates and faulty headphone sockets, some of which were difficult to locate on different machines. Other problems included the font size, contrast, touch screens, and ATMs being located in places that were either too dark or too bright for people with visual impairments.⁶¹ Vivienne Francis told us the above barriers meant people might need to ask for help, “which obviously leaves them open to financial abuse as well.”⁶²

34. Several banks and financial providers have innovated to make their services accessible to blind and partially sighted customers, such as issuing debit and credit cards with tactile indicators. However, this is not standard practice across the banking sector as providers continue to phase out embossed cards. We are also concerned that not all banks properly consider the needs of disabled people in the provision of

54 Royal National Institute for the Blind ([NDS0046](#))

55 Ibid

56 Ibid

57 See for example, Mastercard, ‘[Mastercard introduces accessible card for blind and partially sighted people](#)’, accessed 14 February 2024; RNIB, ‘[RNIB works with Nationwide to create accessible cards](#)’, accessed 14 February 2024

58 Which?, ‘[Banks failing to support disabled customers](#)’, accessed 14 February 2024

59 Royal National Institute for the Blind ([NDS0046](#))

60 Which?, ‘[Banks failing to support disabled customers](#)’, accessed 14 February 2024

61 Royal National Institute for the Blind ([NDS0046](#))

62 Q104

ATMs. *The Financial Conduct Authority should work with the retail banking sector and organisations such as the RNIB to ensure all banks embrace inclusive design from the outset when innovating or phasing out existing services. We recommend that all banks:*

- *roll out flat bank cards that are accessible to disabled people, and continue to issue embossed cards to customers who request them;*
- *in addition to tactile indicators, ensure that all flat bank cards have a clear visual design, including colour, good contrast and large font size; and*
- *where ATMs are provided, ensure they have been user tested with disabled people, installed in locations accessible to all and are regularly checked to guarantee that accessible features are in working order.*

Accessible food packaging

35. The RNIB raised another important concern with us which typically affects blind and partially sighted consumers, around the inaccessibility of obtaining information from food packaging.⁶³ Some 90% of the blind and partially sighted people included in RNIB's research in 2015 said that packaging was difficult or impossible to read.⁶⁴ As a result, the RNIB argued that many people were unable to access important product information such as nutritional value, cooking instructions, allergens and price information, all of which limit the products disabled shoppers can purchase.⁶⁵ Vivienne Francis told us “there is a lack of guidance around areas like accessible packaging, which we are not even sure are covered by the Equality Act”.⁶⁶ Indeed, current guidance on food labelling provides no information on how to make it accessible to people with sight loss or other visual disabilities.⁶⁷

36. We note there are new technologies and tools to increase the accessibility of food labelling. For example, several manufacturers have incorporated NaviLens into packaging designs so blind and partially sighted customers can access necessary information easily. Anyone with a smartphone can use the NaviLens application to scan optical codes on products by pointing their phone camera in the general direction they want to scan.⁶⁸

37. *The Department for Environment, Food and Rural Affairs should review its food packaging guidance in light of new technological approaches being developed and ensure a minimum accessibility requirement on food packaging's essential nutrition, health and pricing information.*

63 Royal National Institute for the Blind ([NDS0046](#))

64 RNIB, *My Voice 2015, The views and experiences of blind and partially sighted people in the UK* (November 2016)

65 Royal National Institute for the Blind ([NDS0046](#))

66 Q86

67 Department for Environment, Food & Rural Affairs, Food Standards Agency, [Food labelling: giving food information to consumers](#), 27 April 2015

68 RNIB, [NaviLens](#), accessed 14 February 2024

Conclusions and recommendations

Accessibility of products and services to disabled people

1. The Disability Action Plan calls on the Disability Unit to publish research into the accessibility of private sector products and services in spring 2024 and to improve its understanding of the barriers disabled consumers face. It is right that policy options should be evidence-based. However, despite the hold ups owing to legal proceedings, it is unacceptable that three years after the publication of the National Disability Strategy, rather than seeing tangible improvements in their lives, disabled consumers are instead left with further delay while waiting for the Government to undertake research, the need for which has long been recognised. (Paragraph 15)
2. Not all businesses are considering the needs of disabled consumers when bringing products and services to the market. Where accessibility is considered, it is often done so retrospectively, as something to be bolted on to an existing design. Products and services should be inclusive by default. By not embracing inclusive design, businesses risk missing out on the spending power of disabled consumers and restricting the options available to them. (Paragraph 16)
3. *The Government should task the Disability and Access Ambassadors with engaging with businesses on inclusive design, to seek out and share best practice and to identify the barriers to making products and services in their sectors accessible to disabled people. The Government should then work with each sector to discuss relevant interventions and develop guidance on best practice.* (Paragraph 17)
4. Disabled people face additional costs in their daily lives. These costs are exacerbated by restrictions on their choice as consumers. We support the Government's commitment in the National Disability Strategy to establish an Extra Costs Taskforce to better understand the extra costs faced by disabled people, including how this breaks down for different impairments. The Government originally planned to set up the taskforce by summer 2022. *We recommend that the Government establish an Extra Costs Taskforce as a priority and by no later than summer 2024.* (Paragraph 18)
5. Disabled people should not have to look for alternatives or settle for less when using online shopping and services. Despite the untapped potential of the purple pound, market forces have failed to drive the urgent improvements that are necessary. (Paragraph 27)
6. *Given that disabled people increasingly need access to online services, information, and social networks, it is imperative that the Government acts on what it has described as the "persistently poor accessibility of private sector websites" without further delay. As a priority, private sector websites and applications which provide essential products and services should be subject to the same regulations as the public sector. Concurrently, Ministers should work with businesses, the Disability and Access Ambassadors and Disabled People's Organisations (DPOs) to lay the ground for legislative action across the other parts of the private sector. The Government should provide an update on its progress on this recommendation within six months of the publication of this report.* (Paragraph 28)

7. Several banks and financial providers have innovated to make their services accessible to blind and partially sighted customers, such as issuing debit and credit cards with tactile indicators. However, this is not standard practice across the banking sector as providers continue to phase out embossed cards. We are also concerned that not all banks properly consider the needs of disabled people in the provision of ATMs. (Paragraph 34)
8. *The Financial Conduct Authority should work with the retail banking sector and organisations such as the RNIB to ensure all banks embrace inclusive design from the outset when innovating or phasing out existing services. We recommend that all banks:*
 - *roll out flat bank cards that are accessible to disabled people, and continue to issue embossed cards to customers who request them;*
 - *in addition to tactile indicators, ensure that all flat bank cards have a clear visual design, including colour, good contrast and large font size; and*
 - *where ATMs are provided, ensure they have been user tested with disabled people, installed in locations accessible to all and are regularly checked to guarantee that accessible features are in working order. (Paragraph 34)*
9. *The Department for Environment, Food and Rural Affairs should review its food packaging guidance in light of new technological approaches being developed and ensure a minimum accessibility requirement on food packaging's essential nutrition, health and pricing information. (Paragraph 37)*

Formal minutes

Members present

Caroline Nokes, in the Chair

Dame Jackie Doyle-Price

Kim Johnson

Lia Nici

Kirsten Oswald

Bell Ribeiro-Addy

National Disability Strategy

Draft Report (*Accessibility of products and services to disabled people*), proposed by the Chair, brought up and read.

Ordered, That the Report be read a second time, paragraph by paragraph. Paragraphs 1 to 37 read and agreed to.

Summary agreed to.

Resolved, That the Report be the Fourth Report of the Committee to the House.

Ordered, That the Chair make the Report to the House.

Ordered, That embargoed copies of the Report be made available, in accordance with the provisions of Standing Order No. 134.

Adjournment

Adjourned till Wednesday 20 March at 2.00pm.

Witnesses

The following witnesses gave evidence. Transcripts can be viewed on the [inquiry publications page](#) of the Committee's website.

Wednesday 29 March 2023

Fazilet Hadi, Head of Policy, Disability Rights UK; **Svetlana Kotova**, Director of Campaigns and Justice, Inclusion London; **Lord Shinkwin**, Chair (2020–2021), The Centre for Social Justice Disability Commission

[Q1–14](#)

Martin McLean, Senior Policy Advisor, National Deaf Children's Society; **Fran Springfield**, Co-Chair, Chronic Illness Inclusion; **Nil Güzelgün**, Policy and Campaigns Manager, MIND

[Q15–32](#)

Wednesday 26 April 2023

Tim Nicholls, Head of Influencing & Research, National Autistic Society; **Maya Stretton**, Young Ambassador, National Autistic Society; **Jackie O'Sullivan**, Executive Director of Communications, Advocacy & Activism, The Royal Mencap Society; **Ciara Lawrence**, Engagement Lead, The Royal Mencap Society

[Q33–59](#)

George Appleton, Head of Policy, Care England; **Jim Blair**, Consultant Nurse and Associate Professor (Hon), Learning Disabilities

[Q60–79](#)

Wednesday 17 May 2023

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

[Q80–113](#)

Wednesday 5 July 2023

Tom Pursglove MP, Minister for Disabled People, Health and Work, Department for Work and Pensions; **Maria Caulfield MP**, Minister for Mental Health and Women's Health Strategy, Department of Health and Social Care; **David Nuttall**, Deputy Director of Neurodiversity, Diversity and Learning Disability, Department of Health and Social Care; **Marcus Bell**, Director of the Equality Hub, Cabinet Office; **Jennifer Heigham**, Deputy Director for Strategy and Briefing for Work and Health Unit, Department for Work and Pensions

[Q114–182](#)

Published written evidence

The following written evidence was received and can be viewed on the [inquiry publications page](#) of the Committee's website.

NDS numbers are generated by the evidence processing system and so may not be complete.

- 1 Anonymised ([NDS0009](#))
- 2 Anonymised ([NDS0007](#))
- 3 Anonymised ([NDS0008](#))
- 4 Anonymised ([NDS0002](#))
- 5 Blair, Jim ([NDS0043](#))
- 6 Bouhfadi , Mrs Vanessa ([NDS0004](#))
- 7 British Psychological Society ([NDS0016](#))
- 8 Care England ([NDS0014](#))
- 9 Central YMCA ([NDS0031](#))
- 10 Cresswell-Plant, John ([NDS0038](#))
- 11 Culverwell, Mrs Teresa (Carer) ([NDS0005](#))
- 12 Cystic Fibrosis Trust ([NDS0025](#))
- 13 Dance Syndrome ([NDS0042](#))
- 14 Disability Charities Consortium ([NDS0024](#))
- 15 Disability Rights UK ([NDS0021](#))
- 16 Equality and Human Rights Commission ([NDS0039](#))
- 17 Family Fund ([NDS0019](#))
- 18 Harris, Eric ([NDS0044](#))
- 19 Healthwatch Solihull ([NDS0006](#))
- 20 Inclusion Gloucestershire and Barnwood Trust ([NDS0029](#))
- 21 Inclusion London ([NDS0030](#))
- 22 Liberation ([NDS0034](#))
- 23 Mencap ([NDS0027](#))
- 24 Muscular Dystrophy UK and SMA UK ([NDS0028](#))
- 25 National Association of Disabled Staff Networks (NADSN) ([NDS0011](#))
- 26 National Autistic Society ([NDS0022](#))
- 27 National Deaf Children's Society ([NDS0040](#))
- 28 National Deaf Children's Society ([NDS0036](#))
- 29 Nethercot, Patrick ([NDS0003](#))
- 30 New Bold Hope ([NDS0045](#))
- 31 Pryer-Vaz, Mrs Rosie (Parent, carer and landlady) ([NDS0018](#))
- 32 Royal National Institute for Blind People (RNIB) ([NDS0046](#))
- 33 Sharp ([NDS0020](#))

- 34 Shaw Trust ([NDS0015](#))
- 35 The British Toilet Association Ltd ([NDS0035](#))
- 36 The Challenging Behaviour Foundation ([NDS0037](#))
- 37 The Trades Union Congress (The TUC) ([NDS0017](#))
- 38 United Response ([NDS0033](#))
- 39 Voluntary Organisations Disability Group (VODG) ([NDS0023](#))
- 40 Whizz-Kidz ([NDS0010](#))
- 41 Working Together with Parents Network - University of Bristol ([NDS0013](#))
- 42 Zeyen, Dr. Anica (Senior Lecturer in Entrepreneurship and Sustainability, Royal Holloway University of London); and Branzei, Professor Oana (Professor of Strategy, Ivey Business School) ([NDS0026](#))

List of Reports from the Committee during the current Parliament

All publications from the Committee are available on the [publications page](#) of the Committee's website.

Session 2023–24

Number	Title	Reference
1st	The National Disability Strategy	HC 34
2nd	Misogyny in music	HC 129
3rd	Health barriers for girls and women in sport	HC 130
1st Special	Attitudes towards women and girls in educational settings: Government, Ofsted and Office for Students responses to the Committee's Fifth Report of Session 2022–23	HC 258
2nd Special	The National Disability Strategy: Government Response to the Committee's First Report	HC 563

Session 2022–23

Number	Title	Reference
1st	Menopause and the Workplace	HC 91
2nd	The rights of cohabiting partners	HC 92
3rd	Black maternal health	HC 94
4th	Equality and the UK asylum process	HC 998
5th	Attitudes towards women and girls in educational settings	HC 331
6th	So-called honour-based abuse	HC 831
1st Special	Ethnicity pay gap reporting: Government response to the Committee's fourth report of session 2021–22	HC 110
2nd Special	Equality in the heart of democracy: A gender sensitive House of Commons: responses to the Committee's fifth report of session 2021–22	HC 417
3rd Special	The rights of cohabiting partners: Government response to the Committee's second report	HC 766
4th Special	Menopause and the workplace: Government response to the Committee's first report	HC 1060
5th Special	Black maternal health: Government Response to the Committee's Third Report	HC 1611
6th Special	So-called honour-based abuse: Government response to the Committee's Sixth Report	HC 1821
7th Special	Equality and the UK asylum process: Government response to the Committee's Fourth Report	HC 1825

Session 2021–22

Number	Title	Reference
1st	Levelling Up and equality: a new framework for change	HC 702
2nd	Appointment of the Chair of the Social Mobility Commission: Katharine Birbalsingh CBE	HC 782
3rd	Reform of the Gender Recognition Act	HC 977
4th	Ethnicity pay gap reporting	HC 998
5th	Equality in the heart of democracy: A gender sensitive House of Commons	HC 131

Session 2019–21

Number	Title	Reference
1st	Unequal impact? Coronavirus, disability and access to services: interim Report on temporary provisions in the Coronavirus Act	HC 386
2nd	Appointment of the Chair of the Equality and Human Rights Commission	HC 966
3rd	Unequal impact? Coronavirus and BAME people	HC 384
4th	Unequal impact? Coronavirus, disability and access to services: full Report	HC 1050
5th	Unequal impact? Coronavirus and the gendered economic impact	HC 385
6th	Changing the perfect picture: an inquiry into body image	HC 274