

# **Government response to the Women and Equalities Committee's HC605 Report on the “Accessibility of products and services to disabled people”**

## **Note on the accessibility of the response**

The Dissolution of Parliament has meant that the publication of this response has had to be brought forwards to 29 May 2024. It has not been possible to prepare the British Sign Language and Easyread versions to this deadline. They will be published on the Committee’s website on 30 May 2024.

## **Government response**

The Government is grateful to the Women and Equalities Committee for their inquiry into the accessibility of products and services to disabled people. The report highlights the Committee’s views on:

- private sector website accessibility and the role of Disability and Access Ambassadors (DAAs);
- introduction of flat bank cards and inaccessibility of Automatic Teller Machines;
- accessible food packaging.

The Government’s response to the Committee’s

recommendations is below:

## **Disability and Access Ambassadors**

***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)***

DAAs are senior business leaders who encourage improvements in the accessibility and quality of services and facilities for disabled people in the sectors they represent. There are 20 DAA posts across a range of industries and sectors and there are currently 18 DAAs in post, while live recruitment is underway for 2 roles. DAA roles are filled by senior business leaders on a voluntary basis.

The aim of the DAA programme is for the recruited ambassadors to identify the barriers to products and services in their sectors being accessible to disabled people, and to feed this information into government

policymaking and into initiatives within specific sectors. This is evidenced through the DAA cohort's quarterly meetings with the Minister for Disabled People, Health and Work. In these meetings, the Minister provides updates on relevant developments in the disability policy portfolio, and hears from the DAA cohort about where advancements are being made to improve sector services and facilities for disabled people - or where there is still more work to be done to achieve those aims.

Further, each DAA maintains relationships with other government departments as appropriate for their briefs. Over the last two years, many have met with the Ministerial Disability Champions, junior Ministers across Government departments who provide a personal lead in championing accessibility and opportunity for disabled people within their departments, on a bi- or multilateral basis. The Minister for Disabled People, Health and Work has recently written to Ministerial Disability Champions encouraging them to work directly with the relevant DAA covering their Department's policy remit and to encourage more engagement with disability stakeholders including the Regional Stakeholder Network, DPO Forum England and the Disability Charities Consortium.

A recent example of where DAAs have inputted into government policymaking is the DAA for Aviation's involvement in the Department for Transport's project to develop routes within airports circumnavigating airport Duty Free sections for those with neurodivergence.

DAAs have published various best practice guidance whilst in post, which are in the public domain. These include but are not limited to the following:

- A Lending Standards Board report into d/Deaf inclusion in banking and credit, an initiative the LSB developed following a roundtable event on this issue hosted by Kathryn Townsend, the Banking DAA.
- A recruitment industry initiative of the RIDI (Recruitment Industry Disability Initiative) chaired by the DAA for Recruitment, Kate Headley OBE, which brought together a leading panel of experts to discuss and debate disability inclusion recruitment priorities and offered practical actions for a more inclusive and equitable workforce.
- The publication of Living Well with Dementia: Harnessing nature to create dementia-inclusive

visitor experiences, aimed at Heritage/visitor attraction practitioners, developed with strong engagement from Kim Klug, the Heritage DAA.

- The University DAA, Geoff Layer OBE, chaired the Disabled Students Commission which published its annual report called Enhancing the Disabled Student Experience in 2022. As a result, significant progress has been made in creating a framework in which universities should seek to demonstrate to disabled students how they will be supported in each Institution.
- The Aviation DAA, Ann Frye OBE, made a film regarding damage to wheelchairs in air travel, to be used as part of training for baggage handlers. The film focuses particularly on the damage caused to powered wheelchairs during loading/unloading from aircraft.
- The DAA for the Built Environment, Jean Hewitt, is the technical author for the British Standards Institute standard, "PAS 6463 Design for the Mind – Neurodiversity and the Built Environment". Jean has presented over 60 times on the standards.
- The Tourism DAA, Ross Calladine, worked with

VisitEngland to launch its new Accessible and Inclusive Toolkit for Tourism Businesses in England. The toolkit includes practical guidance on providing an inclusive welcome, designing accessible buildings, employing disabled people and creating quality accessibility information.

It should be noted that the agency and independence of each DAA is central to the design of the DAA programme. DAAs are not political recruitments, nor are they spokespeople for the government. With support from officials, DAAs set the priorities and agenda for the sector change they strive to enact whilst in post. Designing the programme to be DAA-led - rather than by officials tasking DAAs with specific deliverables - ensures that the DAAs have the power and liberty to use their extensive subject matter expertise about the sectors from which they have been recruited, to prioritise practical and necessary solutions to the real needs of/barriers for disabled people. It also allows the DAAs to manage their commitment of time and resources to the programme alongside their often demanding full time roles as senior business leaders.

The Government is grateful for the work undertaken by all incumbent DAAs and their predecessors.

In addition, as set out in the Disability Action Plan, published on 5 February 2024, the Disability Unit is working to further understand issues such as

- existing training schemes and their success for disabled consumers and businesses
- whether and how disability awareness training adds value to organisations and improves consumer experience
- the end-to-end customer journey, exploring how a scheme could address accessibility across sectors
- whether disabled people are aware of their rights and know how to enforce them

This work will consider the needs of a wide range of disabled people with different impairment types.

The Disability Action Plan also included a commitment to publish research into the accessibility of private sector products and services in spring 2024. This will identify the barriers disabled people face in a full range of sectors and provide more information as well as understanding the sticking points disabled people face in the end-to-end customer journey, including insight into accessibility around the purchasing of products and services.

***We recommend that the Government establish an Extra Costs Taskforce as a priority and by no later than summer 2024. (Paragraph 18)***

We are pleased that we can restart the work around the Extra Costs Taskforce. The Taskforce will be focused on bringing together disabled people, regulators and businesses, to better understand the extra costs faced by disabled people, including how this breaks down for different impairments.

The Disability Unit is currently working up a project plan and engaging with other government departments, including the Department for Work and Pensions, to take this commitment forward. The Disability Unit will begin engaging with interested stakeholders in due course, including disabled people, regulators and businesses, to finalise a definition of extra costs, the terms of reference and focus for the Taskforce.

The Disability Unit will also be using insight from the Disability Action Plan consultation findings regarding the impact of the cost of living on disabled people when taking forward work on the Extra Costs Taskforce.



## **Website accessibility**

***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***

The National Disability Strategy of 2021 included a commitment by the Department for Culture, Media and Sport (DCMS) to “explore how to improve the accessibility of private sector websites”. Due to the initial High Court decision on the National Disability Strategy, work in this area was paused in DCMS and

the proposed activity was not in progress prior to the Machinery of Government changes and creation of the Department for Science, Innovation and Technology (DSIT).

Following the Court of Appeal's overturning of the initial High Court ruling and the creation of DSIT, this commitment was reviewed to ensure that the proposed activity sits with the most relevant department and that it remains the most useful means of embedding accessibility online.

The Government recognises the importance of digital inclusion to accessibility and remains committed to ensuring no one is left behind in a digital age. At this stage of the Parliamentary session, legislative options to address this aspect of the National Disability Strategy are no longer available. However, to support broader digital inclusion policy, DSIT has convened a cross-Whitehall ministerial group which aims to 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. DSIT is also exploring options for funding research to improve the Government's evidence base on digital exclusion, in line with the Government response to the House of

Lords' Communication and Digital Committee's report on digital exclusion.

In parallel, the Cabinet Office's Central Digital and Data Office has sought to ensure the accessibility of public sector websites through the Public Sector Bodies Accessibility Regulations. Guidance and training resources associated with these Regulations are available publicly and can be freely used by the private sector. Where appropriate, DSIT will seek to incorporate the lessons from this work into its consideration of private sector web accessibility.

### **Bank cards and 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. (Paragraph 34)***

The Government recognises the importance of ensuring that banking and payments services are accessible for those who are blind and partially sighted. The Equality Act 2010 requires all relevant parties, including financial services providers, merchants and card machine operators, to make reasonable adjustments in the way they deliver their services to support those with visual impairments.

Under the Consumer Duty, the Financial Conduct Authority sets out clear expectations on firms' treatment of customers with protected characteristics and reminds firms of their obligations under the Equality Act 2010 and equivalent legislation. Firms are expected to consider the diverse needs of their customers at every stage of the customer journey, including when designing their products and services. Where firms hold data about customers' protected characteristics, the FCA expects firms to use this as part of monitoring outcomes for consumers and ensuring that they are upholding their obligations under the Duty and legislation.

The financial services industry has also been working with organisations such as the Royal National Institute for Blind People (RNIB) to make payment services more accessible. The financial services sector has worked with the RNIB to roll out accessible products, including making payment cards easily identifiable and usable for visually impaired people through “dot and notch” features. The RNIB has also worked with 7 high street banks to ensure they provide ‘talking ATMs’. These are ATMs which, when used with headphones, will provide the customer with audio instructions.

There is also wider work to improve accessibility of payments for those with visual impairments. UK Finance and the RNIB have published accessibility guidance for electronic point-of-sale payment devices (which sets out general display requirements for visually impaired individuals), and have also published a list of vendors who produce approved payment devices.

UK Finance and EY also began a series of forums to explore accessibility barriers that exist within banking and financial services, to bring industry together on this issue and better understand the barriers that many face in accessing banking services. UK Finance

is working with relevant parties to work through the solutions proposed through these forums, in order to bring industry initiatives into reality.

### **Accessible food packaging**

***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)***

The availability and accessibility of essential food information to all consumers is vitally important. It is already a requirement that food information must be easily visible, clearly legible, and where appropriate indelible, in addition to there being a required minimum font size for mandatory information. However the necessary trade-off between the font size and provision of a wide range of information on the limited space on a pack means there is inevitably some loss of accessibility for partially sighted consumers, and those with more profound visual impairments are not able directly to access information via a label without assistance.

We know there are exciting possibilities to improve the accessibility of food packaging's essential information, including the use of mobile device apps and QR codes via which consumers with visual impairments may be able to access not only the basics, but the full range of information available on the label.

Furthermore, as part of the UK involvement with the Codex Alimentarius Commission, we are involved in the development of draft guidelines regarding the use of technology to provide information on food, an exciting glimpse into future possibilities of technology in food labelling. This is clearly an area of interest with potential and one with which we will be engaging in the future through Codex, and the Common Framework for Food Composition, Standards and Labelling with the Devolved Authorities.

In light of any new technological approaches to improve accessibility, we need to take account of a number of factors. For example, we must consider the practical viability of alternative labelling methods on a diverse range of packaging formats, and the comparative costs and effectiveness of each method to provide information to people with visual impairments. We must also consider the importance of

digital equity before enforcing the use of technology in food labelling.

This is an important issue that we are keen to look at. We are aware of moves by some retailers to provide information on food packaging in formats which make nutrition, health and pricing information accessible to people with visual impairments, and we are interested in seeing how these trials work in the first instance.