



Customer Service Strategy

Equality impact assessment - findings and recommendations

July 2021

This assessment helps you to consider the impact of strategy on people with protected characteristics. You can update this assessment at any time to inform service planning and commissioning.

Introduction

1. This equality impact assessment has been developed to inform North Norfolk District Council's Customer Service Strategy.

About the Customer Service Strategy

2. The Council's Customer Service Strategy is a key strategy document explaining how the authority will continue transforming services to residents, visitors and businesses of North Norfolk. The Strategy sets out a vision and direction to deliver improved services accessible for all.
3. The Strategy is available as a separate document, and the full details, which include the scope, customer vision and core principles, are not repeated here.

Who is impacted by the Customer Service Strategy?

4. All residents, visitors and businesses of North Norfolk are impacted by the Customer Service Strategy. This includes people with the following protected characteristics:

Characteristic	Customer Service Strategy impact
<p>Age</p> <p>Adults and children, specific age groups</p>	<p>North Norfolk has the highest number of older people in Norfolk – more than the regional and UK average. Age remains a factor in propensity and capability to access digital information and advice, and self-serve online.</p> <p>In recognition of this the Customer Service Strategy adopts a 'digital by design' and not 'digital by default' approach to customer service transformation and outlines North Norfolk District Council's plan to continue to operate a multi-channel access model.</p>
<p>Disability</p> <p>A disability is an impairment which has a substantial and long-term adverse effect on someone's ability to carry out day-to-day activities. For example:</p> <ul style="list-style-type: none"> • People with restricted mobility (e.g. wheelchair or cane users) • Blind and partially sighted people • People who are D/deaf or hearing impaired • People with learning disabilities • People who have mental health issues 	<p>A significant proportion of the North Norfolk population has a disability or long-term health condition – 20%+. Some disabled people – particularly people who are blind or partially sighted; D/deaf or hearing impaired; who have learning disabilities or who have limited mobility face significant barriers to physical and digital services.</p> <p>In recognition of this the Customer Service Strategy adopts a 'digital by design' and not 'digital by default' approach to customer service transformation and outlines North Norfolk District Council's plan to continue to operate a multi-channel access model.</p> <p>All venues will be accessible for disabled people and meet the requirements of the Equality Act 2010.</p>

Characteristic	Customer Service Strategy impact
<ul style="list-style-type: none"> • People who identify as neurodiverse (neurological differences such as dyspraxia, dyslexia, Attention Deficit Hyperactivity Disorder, the autistic spectrum and others). • People with long-term health conditions. 	
<p>Gender reassignment</p> <p>People who identify as transgender (defined as someone who is proposing to undergo, is undergoing or has undergone a process or part of a process to reassign their sex. It is not necessary for the person to be under medical supervision or undergoing surgery).</p> <p>You should also consider the needs of people who identify as non-binary (a spectrum of gender identities that are not exclusively masculine or feminine).</p>	<p>We will ensure that our venues are welcoming, and our staff trained to be confident to engage positively with people from diverse backgrounds. We do not envisage an impact on this protected group. We will ensure published content and materials illustrate diversity in a positive way and promote participation across all groups and access to services.</p>
<p>Marriage/civil partnerships</p> <p>People who are married or in a civil partnership. They may be of the opposite or same sex.</p>	<p>We will ensure that our venues are welcoming, and our staff trained to be confident to engage positively with people from diverse backgrounds. We do not envisage an impact on this protected group. We will ensure published content and materials illustrate diversity in a positive way and promote participation across all groups and access to services.</p>
<p>Pregnancy & Maternity</p> <p>Maternity refers to the period after birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.</p>	<p>We will ensure that our venues are welcoming, family friendly, supportive of breast-feeding and our staff trained to be confident to engage positively with families and children. We will ensure published content and materials illustrate diversity in a positive way and promote participation across all groups and access to services.</p>
<p>Race</p> <p>Race refers to a group of people defined by their race, colour, or nationality (including citizenship)</p>	<p>We will ensure that our venues are welcoming, and our staff trained to be confident to engage positively with people from diverse backgrounds and people who may not speak or write confidently</p>

Characteristic	Customer Service Strategy impact
<p>ethnic or national origins.</p> <p>A racial group can be made up of two or more distinct racial groups, for example a person may identify as Black British, British Asian, British Sikh, British Jew, Romany Gypsy or Irish Traveller.</p>	<p>in English. We will ensure that published content and materials illustrate diversity in a positive way and promote participation across all ethnic groups, and access to services. This would include the use of translation services and provision of printed materials in other languages where this is required and appropriate.</p>
<p>Religion/belief Belief means any religious or philosophical belief or no belief. To be protected, a belief must satisfy various criteria, including that it is a weighty and substantial aspect of human life and behaviour. Denominations or sects within a religion can be considered a protected religion or religious belief.</p>	<p>We will ensure that our venues are welcoming, and our staff trained to be confident to engage positively with people from diverse backgrounds. We do not envisage an impact on this protected group. We will ensure published content and materials illustrate diversity in a positive way and promote participation across all groups and access to services.</p>
<p>Sex</p> <p>This covers men and women. You should also consider the needs of people who identify as intersex (people who have variations in sex characteristics) and people who identify as non-binary (a spectrum of gender identities that are not exclusively masculine or feminine).</p>	<p>We will ensure that our venues are welcoming, and our staff trained to be confident to engage positively with people from diverse backgrounds. We do not envisage an impact on this protected group. We will ensure published content and materials illustrate diversity in a positive way and promote participation across all groups and access to services, including people who identify as non-binary.</p>
<p>Sexual orientation People who identify as straight/heterosexual/lesbian, gay or bisexual.</p>	<p>We will ensure that our venues are welcoming, and our staff trained to be confident to engage positively with people from diverse backgrounds. We do not envisage an impact on this protected group. We will ensure published content and materials illustrate diversity in a positive way and promote participation across all groups and access to services.</p>

Potential impact - conclusion

The Customer Service Strategy should impact positively on people in North Norfolk with protected characteristics.

5. This is because the Strategy specifically aims to provide access to customer services for everyone in North Norfolk – and this includes people with protected characteristics, as set out above.
6. Some people with protected characteristics – particularly people who are blind or partially sighted; D/deaf or hearing impaired; who have learning disabilities or who

have limited mobility face significant barriers to physical and digital services. North Norfolk has a higher than average number of disabled and older residents, so it is particularly important that access for these groups is taken into account.

7. In addition, some other people also experience barriers to services, due to low literacy skills – including Gypsies, Roma and Travellers, and people whose first language is not English.
8. The Strategy is ambitious to work with disabled people and people from other groups, to find ways to overcome barriers and ensure that everyone in North Norfolk can easily access North Norfolk District Council information and services.

The Strategy sets out a specific aim of ‘digital by design’. Disabled people in particular – and people from other groups – face barriers to getting online and accessing digital information and virtual environments. A comprehensive analysis of this must be considered alongside the Customer Service Strategy and is set out in Annex 1.

Recommended actions

	Action	Lead	Date
1.	Continue to work with disabled and older people and residents from other groups, to find ways to overcome barriers to physical and digital access and ensure that everyone in North Norfolk can easily access North Norfolk District Council information and services.	Customer Services Manager and Health and Communities Manager	Ongoing – annual reporting
2.	Ensure that our digital technologies – such as our computer hardware, software, apps, business systems and business equipment such as smart phones - are accessible for disabled staff and service users: All new projects to comply with minimum accessibility standards. Any manager commissioning technology will be required to meet these standards.	Assistant Director (Organisational Resources) and Network Manager	Ongoing
3.	Ensure that our digital web content is accessible regardless of people’s ability, disability or literacy skills or whether English is their first language.	ICT Web Manager	Ongoing
4.	We will explore delivery of an internal media / communications campaign to ensure that managers and staff understand their responsibilities to provide accessible technology, digital and web content. This will reinforce key information, such as: a. When creating website content, managers are responsible for ensuring it meets accessibility	Requires cross-service team comprising the following to develop and roll out training programme on this - Comms Team, ICT Web Manager, HR Team and Health and Communities Manager	31 st March 2022

	Action	Lead	Date
	<p>requirements.</p> <p>b. Present content in the most accessible format (eg only creating downloadable documents if there is a good case not to use web page content)</p> <p>c. Ensure downloadable documents are in the most appropriate file format and are formatted to meet accessibility requirements, including Easy Read documents</p> <p>d. Ensure video content meets accessibility requirements (eg. by producing accurate closed captions, text transcripts etc. where required)</p> <p>e. Ensure that all new software/apps introduced by the Council are accompanied by instructions to managers about how to ensure accessibility.</p>		
5.	Guidance to be developed for managers about how to ensure accessibility and inclusion when interacting digitally with customers and colleagues (eg how to facilitate an accessible Teams meeting, with blind and D/deaf participants).	Customer Services Manager and Health and Communities Manager	31 st March 2022

Annex 1

The common barriers that disabled people and people with other protected characteristics face when getting online and accessing digital information and virtual environments

Overview

1. This assessment sets out the barriers that disabled people and people with other 'protected characteristics' face when getting online and accessing digital information and virtual environments.
2. The assessment has been developed to inform ongoing implementation of North Norfolk District Council's Customer Service Strategy.

Background

3. North Norfolk District Council is making greater use of digital technology and virtual environments to deliver services and engage with residents, service users and staff in the most accessible, safest and cost-effective ways possible.
4. This means that digital inclusion is an increasingly important factor in the ability of people to live and work independently in North Norfolk.
5. In the long term, the use of technology, particularly virtual working, offers the potential to enhance equality and inclusion for people with protected characteristics – for a range of reasons, set out in this document.
6. Inevitably however, some people, particularly disabled people, people with low literacy skills and people with limited resources, face barriers to getting online.
7. This assessment summarises the key barriers that people with protected characteristics commonly face to digital accessibility. It recommends actions for addressing these barriers.

Legislation for accessible digital information

8. Three pieces of legislation set the context for the provision of accessible digital information:

(a) The Public Sector Equality Duty

9. Public authorities are required by the Equality Act 2010 to give due regard to equality when exercising public functions¹, and to ensure that services and information are

accessible.

10. They are also required to make reasonable adjustments to information for disabled people, for example, providing [information in an alternative format](#) or [an accessible format](#), like large print or an audio recording.

(b) The Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018

11. Public bodies like North Norfolk District Council must comply with the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018²:
 - New public sector intranets and extranets must meet level AA of the [Web Content Accessibility Guidelines \(WCAG 2.1\)](#) as a minimum³.
 - Older intranets and extranets (published before 23 September 2019) must be made accessible when they are updated.
 - Mobile applications must be accessible by 23 June 2021⁴.
 - Public bodies must systematically and routinely test web, digital and virtual interfaces with commonly used [assistive technologies](#). This is to ensure that everyone can use the software they rely on to access the Council, such as screen readers, screen magnifiers and speech recognition software.
 - Websites and applications owned by public sector bodies must have an [accessibility statement](#) that explains how accessible the service (including mobile apps) is. Note that there may be a number of websites owned, commissioned or managed by North Norfolk District Council, not all of which may be compliant with the regulations.
 - Disabled and older people must be engaged in [user research](#).
12. Further details about the regulations are set out in the [latest guidance](#).
13. Some organisations which are not exempt from the regulations may not need to fully meet the regulations. This is the case if the impact of fully meeting the requirements is too much for an organisation to reasonably cope with. The accessibility regulations call this a 'disproportionate burden'⁵. Interpreting what constitutes a 'disproportionate burden' is complex, and many factors must be taken into account.

(c) The Accessible Information Standard

14. The [Accessible Information Standard](#) is a legal requirement for organisations that provide publicly-funded adult social care. North Norfolk District Council may on occasions be commissioned to provide social care related services on behalf of other organisations. The Standard sets out a specific, consistent approach to identifying, recording, flagging, sharing and meeting the information and communication support needs of patients, service users, carers and parents with a disability, impairment or sensory loss.

What is 'digital exclusion'?

15. The definition of digital exclusion is 'people who are unable to get online or who lack basic digital literacy skills to make the best use of the opportunities of being online'.
16. Digital exclusion is often described in these terms:

- **Digital literacy and skills** – being able to use computers, the internet and mobile technology such as smart phones.
- **Accessibility** – Ranging from broadband connectivity and assistive technology for disabled people to the design and provision of physical infrastructure, services and information to meet all users' needs.
- **Affordability** - affordable access to the internet and digital devices is still an issue for many people.
- **Culture and attitudes** – some people may believe 'it's not for me' or have fears or anxieties about appearing incompetent. Or, they may have found that although they can access landing pages, they cannot get much further. Some people may have had negative experiences through hate-related bullying or harassment on social media.

Who is at risk of digital exclusion?

17. People with protected characteristics are at particular risk of digital exclusion.
18. Prior to the COVID-19 pandemic, the cohort most affected by digital exclusion was people over 65 on low incomes, disabled people and people with low literacy skills. In addition, Gypsy, Roma and Traveller (GRT) young people have historically faced considerable digital exclusion, which is likely one of many factors in GRT young people's reduced outcomes in education.
19. Of this cohort, the most digitally excluded tend to be D/deaf people, people with learning disabilities and people with dual sensory loss – despite the protections of the Equality Act 2010 and the Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations 2018.
20. This is because all public bodies must meet WCAG 2.1 AA compliance under the Regulations. However, it is recognised that some elements of this such as video content, alternative information formats and some colour and contrast criteria falls under WCAG 2.1 AAA compliance. This has the potential to put some groups of disabled people at a significant disadvantage compared to others when accessing digital information. For instance, many people within the Deaf community rely on BSL video; many people with learning disabilities rely on alternative formats such as Easy Read; and many people with dyslexia rely on colour and text options to enable reading to be easier.

Emerging issues, triggered by the COVID-19 pandemic

21. The pandemic required employers, service providers, service users and staff in North Norfolk to rapidly adopt new technologies and virtual working arrangements. Through this, emerged a 'digital divide' – the gap between people who were able to benefit from the internet and those who were not.
22. For example, some people were able to readily adjust to life online – because they had sufficient space, equipment, resources, quiet, literacy skills and the personal resilience to work and socialise digitally (and if necessary support children to engage in remote learning). Others, who did not have these physical and psychological resources, faced many barriers.

23. People who already experienced digital exclusion faced even greater barriers - particularly D/deaf and blind people, people with learning disabilities, Gypsies, Roma and Travellers and people new to North Norfolk from abroad who have limited resources and low literacy skills.

Inaccessible digital technologies – computer hardware, software, apps, business systems and equipment

24. Another significant issue is that ongoing innovation to support digital working has led to a huge increase in the number of hardware, software and apps being launched across the public sector. However, the vast majority of these are not fully accessible. Sometimes it is not always possible for North Norfolk District Council to test apps prior to launch as they may be additional features which are added to system updates and there is limited notice or no opportunity to turn them on/off.
25. One example of this is the Whiteboard app - remembering that this is just one example of 'small apps' and features introduced in a given time:
- The app cannot be designed to work with screen readers and is unlikely to be accessible for people who are blind or partially sighted
 - The screen is mouse driven, so people who navigate via keyboard/voice cannot use it
 - There is no spell check within the 'post-it' note function - so someone who has systems in place to manage dyslexia or a learning difference is placed at a disadvantage
 - Use of an interpreter for Deaf people would be problematic as trying to identify what to interpret would be challenging.
26. As with most technology, there are solutions to these issues, but this requires an agreed approach to resolve – for example, routinely testing all apps before implementation, and instructing presenters, team managers, colleagues etc. to be aware of how to make this kind of activity accessible.
27. Another issue is that there may be a significant number of IT developments that go straight to third party procurement. Often no accessibility requirements are worked into these proposals.
28. Looking forward, online virtual interactions, transactions and meetings may be the 'norm'. This raises a number of issues that need to be resolved, e.g. how an individual's accessibility software such as screen readers and dictation software will work in this environment.

Inaccessible web content and digital information

29. North Norfolk District Council is embedding a process for monitoring of the Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations 2018 and requirements to ensure the Council's digital offer adequately supports the needs of disabled people.
30. Work has been undertaken by North Norfolk District Council to meet the regulations WCAG 2.1 AA level – to include examining how alternative format information such as video, easy read and BSL can be better used as part of online offer and

engagement with disability groups. There is a commitment to continue to develop and respond to the requirements.

31. Work is planned by the Council to continue to explore opportunities to enhance the accessibility of the online customer journey and content of websites, moving towards AAA standards wherever possible. However, there is work to be done in understanding what this will look like and how to incorporate alternative mechanisms such as video.
32. A particular priority to achieving online web accessibility and digital content is ensuring that managers and staff understand their responsibilities to upload accessible digital and web content to the internet. For example, many managers do not understand why their digital assets need to be accessible and it is not always understood that it is each manager's responsibility.
33. To address this, more work is required to ensure that North Norfolk District Council has the right policies and training in place to support staff.

Current barriers to web accessibility in the UK and North Norfolk

34. Many online public services, web content and apps are still not accessible to all users.
35. In 2018, independent testing by Socitm found that 40% of UK local authority websites were not accessible to disabled people.
36. Since this period, Socitm has changed the format of testing and now partner with Silktide. Currently, Silktide gives North Norfolk District Council a rating of around 95.8%.

Opportunities ahead

37. In the longer term, digital technology offers the potential to enhance accessibility and inclusion for people with protected characteristics – including older and disabled people, parents and carers. This is for several key reasons:
 - In some (but not all) respects, the virtual working environment is more egalitarian than the physical world and provides more opportunities for people to be judged on their merit, rather than their physical attributes or abilities.
 - Lockdown required employers to rapidly enhance digital working opportunities. This enabled creative solutions to be explored and successfully implemented. It has also changed the balance from employers playing catch-up to technology, to a situation where aspirations to provide an accessible virtual working environment are being held back by digital solutions not being available. This is now starting to level out.
 - For example, there was swift move to offering BSL interpreters virtually rather than in person for customers and staff. This is heavily reliant on technology to work in a certain way, and it has taken considerable time for the technology to be available.
 - The virtual environment minimises the need for travel and constant transfer from

venue to venue (travel and hot desking is often disproportionately difficult and costly for disabled people, and office environments can be disabling). Travel also takes time and logistics planning, and people who have child care or caring responsibilities often find that virtual working saves them valuable time, and better enables them to balance caring responsibilities (assuming that they have the relevant conditions in place at home to make remote working feasible).

- Depending on an individual's personal circumstances (remembering that some people may not have the resources to work effectively from home), virtual environments enable people to set up and control their working environments in the best way for them, in terms of neurodiversity, accessibility, temperature, noise levels, etc.
 - It enables greater flexibility to manage health conditions eg if someone has to take medication, empty a stoma bag or work in short bursts and then rest.
 - It enables women who are expressing or breastfeeding following a return from maternity leave to manage this more effectively.
 - It enables people to limit physical contact with others, if, for reasons of mental health, someone wishes to do so (for example, when experiencing an episode, which makes engaging with others in the physical world challenging).
38. It is important to note that these advantages do not benefit all people with all protected characteristics, but they are important considerations.

Conclusion

39. During the pandemic there has been a need to develop and improvise virtual and remote working. This has often been a case of trial and error, and North Norfolk District Council's ICT services, the web content team and service managers have worked 24/7 to identify solutions to barriers as and when they have occurred.
40. During this time there has been a great deal of knowledge and innovation developed, regarding how service users and staff can be supported to work and engage digitally. Inevitably, there continue to be a range of barriers to overcome and adjustments to make, and this may take some time, but the end result should achieve greater inclusion for all.
41. There will always be people who cannot access digital or virtual platforms, for the reasons set out in Annex 2, and provision will need to be made for these groups. Some services will need to offer an adaptable environment to ensure services can still be offered to people who cannot access digital services.

Evidence used to inform this assessment

- Demographic factors for North Norfolk set out in [Norfolk's Story 2021 published - Norfolk Insight](#)
- Business intelligence and management data, as quoted in this report
- Equality Act 2010 and Public Sector Equality Duty codes of practice

Further information

For further information about this equality impact assessment please contact:
Jane Wisson 01263 516096



If you need this document in large print, audio, Braille, alternative format or in a different language please contact Jane Wisson 01263 516096(Text relay).

¹ This is called the 'Public Sector Equality Duty'. The purpose of an equality impact assessment is to consider the potential impact of a proposal on people with protected characteristics. If the assessment identifies any detrimental impact, this enables mitigating actions to be developed. The Act states that public bodies must pay due regard to the need to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act;
- Advance equality of opportunity between people who share a relevant protected characteristic¹ and people who do not share it;
- Foster good relations between people who share a relevant protected characteristic and people who do not share it.

The full Act is available [here](#).

It is not always possible to adopt the course of action that will best promote the interests of people with protected characteristics. However, equality assessments enable informed decisions to be made that take every opportunity to minimise disadvantage.

When you may be exempt from accessibility regulations

All UK service providers have a legal obligation to make reasonable adjustments under the Equality Act 2010 or the Disability Discrimination Act 1995 (in Northern Ireland).

The following organisations are exempt from the accessibility regulations:

- Non-government organisations like charities - unless they are mostly financed by public funding, provide services that are essential to the public or aimed at disabled people
- public sector broadcasters and their subsidiaries

The following organisations are partially exempt from the accessibility regulations:

- primary and secondary schools or nurseries - except for the content people need in order to use their services, for example a form that lets you outline school meal preferences

Partially exempt organisations would need to publish an accessibility statement on their website.

² If you created a new public sector website on or after 23 September 2018, you need to meet accessibility standards and should have published an accessibility statement by 23 September 2019. You need to review and update your statement regularly.

4 Existing websites

You need to meet accessibility standards and publish an accessibility statement. You need to review and update your statement regularly.

Intranets and extranets need to comply from when there are significant changes to them.

You may not have to meet the requirements for your whole website or app if doing so would be a disproportionate burden - for example, if it's very expensive to make even simple changes and those changes would bring very limited benefits to disabled people.

You do not need to fix the following types of content because they're exempt from the accessibility regulations:

- pre-recorded audio and video published before 23 September 2020
- live audio and video
- heritage collections like scanned manuscripts
- PDFs or other documents published before 23 September 2018 - unless users need them to use a service, for example a form that lets you request school meal preferences
- maps - but you'll need to provide essential information in an accessible format like an address
- third party content that's under someone else's control if you did not pay for it or develop it yourself - for example, social media 'like' buttons
- content on intranets or extranets published before 23 September 2019 (unless you make a major revision after that date)
- archived websites if they're not needed for services your organisation provides and they are not updated

You'll need to explain in your accessibility statement that you've not made things like this accessible because they are exempt.

Annex 2

Summary of key barriers to digital inclusion faced by people with protected characteristics

Protected characteristic	Disability and long-term health conditions
Barriers to digital literacy	Yes
Barriers to accessibility	Yes
Barriers to affordability	Yes
Cultural barriers	Yes
Reasons for barriers	<p data-bbox="696 507 1532 539">Some barriers affect many disabled people. These include:</p> <ul data-bbox="696 560 2065 1520" style="list-style-type: none"> <li data-bbox="696 560 2065 815">• Web sites and content that is not compatible with assistive technology: websites may not be coded to incorporate built-in accessibility, relying instead on users having expensive software. Or, a user's assistive technology may be incompatible with other assistive technologies, which makes it difficult or impossible for people using solutions like text-to-speech screen readers or magnification software to access web information and self-service. Even the most sophisticated screen reading software cannot help users make sense of what they are using when content is unstructured or unlabelled. <li data-bbox="696 836 2065 1054">• Cost of assistive technology: assistive technologies such as text-to-speech screen readers, dictation systems, voice activated software, screen readers or magnification software come at a cost. For example, JAWS is the industry standard assistive software for blind people, but costs £840+ and version updates can be over £200. It would also require hardware with an adequate processing speed, a larger monitor and a specialist keyboard to be used effectively. Routine upgrades are also costly. <li data-bbox="696 1075 2065 1520">• The complexity of web content: People who have learning disabilities or differences, are D/deaf, neurodiverse, have poor memory, concentration or low literacy or language skills find the relative complexity of web information and the need for strong literacy skills a challenge. Web pages are text heavy, and content may be written in a way that is hard to understand, navigate or use. Use of Easy Read and British Sign Language (BSL) videos can assist, but these tend to be used sporadically which is confusing for users because it means that while some pages may be accessible, other pages linked to them are not. Short clips giving an overview of a subject can often significantly improve access – but only if they are used on every page. Processes (such as form filling) can often take a long time to complete, with 'time out' shutdown or no save functions. This causes barriers for people who can only use the internet for short periods of time, who find it difficult to remember information or concentrate for periods of time.

	<ul style="list-style-type: none"> • Location/travel: the nature of a person’s disability and the high cost and effort of accessible travel, coupled with the need for assistive technology and/or an adapted working space, means it may be unrealistic for some disabled people to access the internet at public locations. Some public locations may present other barriers, for example public computers in settings that are in busy, noisy, brightly lit public spaces may not be inclusive of people who are neurodiverse. • Some staff who rely on Access to Work may need different adjustments, such as access to live captioning instead of BSL interpreters. • There are additional barriers for specific user groups of disabled people. • A summary is provided in Annex 3 of the additional barriers that specific disabled user groups commonly experience when accessing web or digital information.
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Protected characteristic	Race
Barriers to digital literacy	Yes
Barriers to accessibility	No
Barriers to affordability	Yes
Cultural barriers	Yes
Reasons for barriers	<p>People newly arrived to North Norfolk from abroad</p> <ul style="list-style-type: none"> • Some people newly arrived from abroad may not have the resources (including accommodation or credit rating) necessary to access the internet. • They may not have the literacy skills necessary to navigate online information, even if they do have access to the internet. • People who are not fluent in English may be anxious about using online services because they are worried about making errors and do not want to submit wrong information. Google Translate offers a partial solution. • An example is someone who does not speak or write English confidently, who works in the gig economy and who is paid weekly. COVID triggered a swift move by employers to online working. Many employers began to issue payslips online, rather than in document form. This created a significant problem for people on low incomes, who needed to know week to week exactly what their income was, but who could not access payslips because they could not get online. <p>Gypsy, Roma & Traveller people</p>

	<ul style="list-style-type: none"> • Many Gypsy, Roma & Traveller (GRT) adults and children living on sites or encampments in North Norfolk experience barriers to digital inclusion: Some sites and many encampments may not have good access to the internet • The transient nature of some families means access to broadband and wifi especially in rural parts of North Norfolk may be limited. Internet access via 3G or 4G is costly and may depend on a person having a smartphone contract. • A large majority of GRT people have low literacy levels, so many people find navigating web information challenging. Culturally, they may be reluctant to ask for help. • Mobile homes and caravans are small, often with many family members living in a small concentrated area, so there is limited ability to focus in a quiet space • This is a significant issue for young GRT people, as school curriculums and processes are increasingly technologically-based. • GRT young people already experience some of the worst outcomes of any ethnic or social group in the country, including below average educational attendance and attainment, low literacy levels, and higher levels of special educational needs and disability. <p>People from Black and Asian backgrounds</p> <p>Evidence indicates that some Black or Asian people may be in lower income groups, so affordability may be an issue. National data shows that White and Bangladeshi residents are less likely to use the internet.</p>
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Protected characteristic	Gender reassignment
Barriers to digital literacy	No
Barriers to accessibility	No
Barriers to affordability	No
Cultural barriers	Yes
Reasons for barriers	<ul style="list-style-type: none"> • Some information systems do not enable people to state their preferred title (eg Ms, Mx, as opposed to Miss or Mr). • Technology presents opportunities to enable people to state their preferred gender pronouns without having to constantly correct people or ‘come out’ – eg in phone/contact directories, Teams/Zoom profiles, or email signatures.

	<ul style="list-style-type: none"> • State whether North Norfolk District Council supports staff to state their preferred pronouns on their email signature if they wish. It would be advantageous if there was a facility within Microsoft Teams and the contact directory for staff to state their pronouns.
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Protected characteristic	Marriage/civil partnerships
Barriers to digital literacy	No
Barriers to accessibility	No
Barriers to affordability	No
Cultural barriers	Yes
Reasons for barriers	In some relationships, domestic abuse such as coercive behaviours could mean that some people restrict their partner's use of the internet – eg a perpetrator of domestic abuse may not wish their partner to access support or to communicate with others.

Protected characteristic	Pregnancy and maternity
Barriers to digital literacy	No
Barriers to accessibility	No
Barriers to affordability	No
Cultural barriers	No
Reasons for barriers	None identified.

Protected characteristic	Religion and belief
Barriers to digital literacy	No
Barriers to accessibility	No
Barriers to affordability	No
Cultural barriers	Yes
Reasons for barriers	Cultural and social mores and values in some faith communities may mean that some people may discourage or restrict others from accessing the internet, if they consider that exposure could in some ways undermine the values of the faith – eg strong patriarchal values could mean that some men may limit the internet access of women or younger people.

Protected characteristic	Sex
Barriers to digital literacy	No
Barriers to accessibility	No
Barriers to affordability	No
Cultural barriers	Yes
Reasons for barriers	<p>See issues highlighted for 'gender reassignment. Also:</p> <ul style="list-style-type: none"> • Use of language – ensure that gender inclusive language is routinely practiced in digital web information– eg routinely state 'he/she/they' instead of just 'he/she'. Avoid restrictive gender terminology, eg 'ladies and gentleman'. • There is no significant difference in internet use between women and men under the age of 65. Gender difference is evident among older age groups. However, internet use among women aged 75 and over has almost trebled since 2011. • In some relationships, strong gender norms or domestic abuse such as coercive behaviours could mean that some people restrict their partner's use of the internet – eg a perpetrator of domestic abuse may not wish their partner to access support or to communicate with others.

Protected characteristic	Sexual orientation
Barriers to digital literacy	No
Barriers to accessibility	No
Barriers to affordability	No
Cultural barriers	Yes
Reasons for barriers	<ul style="list-style-type: none"> • Use of language – ensure that inclusive language is routinely practiced in digital web information– eg do not assume that all relationships are heterosexual or fit particular norms or stereotypes. • In data collection forms, enable people to state their sexual orientation and offer appropriate options.

Annex 3 – Barriers for specific user groups of disabled people

A summary is provided below about the barriers that specific disabled user groups commonly experience when accessing web or digital information:

User	What this may mean	Potential mitigations
People with mobility impairments or health conditions that restrict motor ability, cause pain, fatigue, poor concentration or memory	This can make it difficult to use a mouse, keyboard or touchscreen, sit at a computer, remember information, or have sufficient energy/comfort levels to work through lots of different windows/forms in succession.	Do not assume that people can get online or stay online. Keep information as simple and concise as possible. Where forms need to be completed, enable the user to save their progress and return to it at a later date.
Blind and partially sighted people	<p>Many blind and partially sighted people cannot access web information, because websites are incompatible with assistive technologies such as screen readers.</p> <p>These users may find that although a website's landing page is accessible with screen reader technology, subsequent pages are not – which is frustrating.</p> <p>PDF documents are not accessible unless you use Adobe Pro.</p>	<p>If you do not have Adobe Pro, you can increase the accessibility in some (but not all) versions of Adobe by doing the following: click Edit > Accessibility > Set up Assistant to add some accessibility options in the document. Note though that even if you do this, the PDF will still not be fully accessible for people using screen readers.</p> <p>Some basic tips to check that web information is accessible:</p> <ol style="list-style-type: none"> 1. Use clear, formatted headings, to help screen reader users navigate your document or webpage. 2. Do not use images of text to convey information as they cannot be read by screen readers. 3. Ensure text can be resized and background and text colours can be modified to suit the reading preferences of users. 4. Make sure links are written to describe the document or resource they send the user to. 5. Make sure information or explainer videos convey the same information in the audio voiceover as the images on screen. 6. Use image descriptions to share the information given in an image or photograph. 7. Ensure downloadable content (Word or PDF) is accessible.
D/deaf and hearing-impaired people	This can make it difficult to hear audio. Also, many D/deaf and hearing-impaired people have lower literacy levels, so may struggle to understand subtitles or navigate web content.	<p>Provide key information in a variety of formats, eg British Sign Language (BSL) video, email, SMS text, letter writing and provision of stamps.</p> <p>Ensure call centres have access to, and know how to use, telephone language and interpreting services.</p> <p>During the pandemic, interpreter services have been a combination of face-to-face and online interpreting. Although face-to-face interpreting will always be needed in some situations, being able to offer online interpreting has proven a positive step forward and should be considered part of any new service offer.</p>
People with learning disabilities	<p>This can make it difficult to understand or navigate web content.</p> <p>Some websites provide 'easy read' alternatives on some pages, but there is often no logic to this, in that only some pages have an easy read alternative and others do not. This is frustrating for people with learning disabilities and undermines independence.</p>	<p>Where possible, provide information in easy read format, or convey simple information in videos.</p> <p>Use plain English in all communications.</p>

	<p>One challenge that public agencies face in routinely providing easy read is that the fast-changing nature of web content means they do not consider it possible to consistently provide 'easy read' alternatives to all content.</p> <p>Similarly, despite the technology being available, BSL videos are not consistently used on websites. Short clips giving an overview of a subject can often significantly improve access – but only if they are used on every page. It is a source of frustration to disabled people that while some pages may be accessible, other pages linked to them are not.</p>	
<p>People who are neurodiverse (a term that describes people with neurological differences such as Autism, Dyslexia, Dyspraxia, Attention Deficit Disorders and Dyscalculia)</p>	<p>This can make it difficult to understand complex web content or use systems which present multiple choices and configurations.</p> <p>It can also make it difficult to concentrate, particularly in busy, noisy or harshly lit surroundings such as public spaces. It can make it difficult to use the internet in public spaces, due to anxiety about being around others or in unfamiliar surroundings</p> <p>People with dyslexia may struggle to read black text on white background. Very few websites offer colour tint options.</p> <p>People who have hyperactivity or attention disorders may find it difficult to concentrate or become easily distracted.</p>	<p>Make sure that information is concise, factual and clear about what is expected of people and how they can participate. Avoid nuance.</p> <p>Be consistent and avoid changing messages (or provide reasons for the change).</p> <p>Tips for making information dyslexia friendly:</p> <ol style="list-style-type: none"> 1. Use Adobe Pro PDF documents with the full accessibility settings turned on. 2. Where possible avoid using black writing on white background, even -off white or grey is better. 3. Consider using alternative ways of providing information either graphically or possibly video where appropriate.
<p>People with mental health issues, which may cause poor concentration, memory, understanding or anxiety</p>	<p>This can make it difficult to understand or navigate web content, due to difficulties processing complex information, feelings of being overwhelmed or frustrated, or panic about making errors.</p> <p>Swift changes to how services were delivered from physical to digital platforms was a trigger for mental health issues, including people who find change difficult due to a disability and who had to change suddenly.</p> <p>Many people may not have an environment or workspace that supports their physical and psychological needs at home, and so experience extra strain. Many people use a range of assistive technologies, and these may only be available on their work computers, not their devices at home.</p> <p>Even if an individual does have the right equipment at home, if their organisation introduces new apps or software to all staff, the resources, training or the programme itself may not be accessible, creating a barrier for disabled employees and service users.</p> <p>An emerging issue triggered by the shift to virtual working is that managers and staff have suddenly had to find ways of managing a huge increase in emails, messages and contact from multiple sources.</p>	<p>Keep information as simple and concise as possible. Where forms need to be completed, enable the user to save their progress and return to it at a later date.</p>