Submission to The House of Lords COVID-10 Committee:
Living online: the long-term impact on wellbeing
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Blackpool HeadStart https://sites.google.com/seaside.blackpool.org.uk/mock/home
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Introduction:

In this submission we draw on our collective organisational and personal experiences, relating them to policy and practices associated with COVID 19 and equalities more generally. We are a community of academics, students, practitioners, parents/carers and young people working together to beat the odds and change the odds, as and with disadvantaged communities. Many of us have our own complex life challenges including physical and learning disabilities.

Digital inclusivity, accessibility and, **data accountability** are extremely important issues to address to enable collective working partnerships, such as ours. Here, we share our insights and make recommendations for improved policy and practice, linking to these 3 themes. We relate them to potential impacts on the physical health, mental health, social interaction and the quality of working life of disadvantaged populations. As some authors are young people, we include engagement with education as one aspect of quality of working life.

Digital Inclusivity:

Improving digital inclusivity is about taking steps to ensure both communities and individuals have sufficient access to digital infrastructure, technological equipment and relevant skills training (i.e. narrowing the digital divide). This is in keeping with the UK Digital Strategy (01.03.2017). We further argue that improved digital accessibility in the face of COVID-19, includes creating infrastructure to enable UK charities, trusts, businesses, the self-employed and public services improved access to online engagement tools, and platforms for e-commerce (i.e. investing in the digital high street).

The Digital Divide:

Those that do not have basic access to technology, training and the internet and/or network access, fall into what is called the 'digital divide' (BBC, 2020). Recent data from the Office of the National Statistics (ONS, 07.08.2020) shows that 96% of UK households have access to the internet. This data is questionable. It draws from the Opinions and Lifestyle Survey to draw its conclusions, however this is problematic as this survey follows a mixed-mode design which is "online first with telephone follow-up" (ONS, Oct 2019). Thus, results are likely to be skewed when participation in a survey- ABOUT online access- is initially limited to those WITH online access. Online survey designs further exclude some individuals on the basis of disability. We

will talk about this later. **For now, we recommend that research associated with the digital divide, should not primarily rely on online survey designs.**

We further call on the government and research institutions to investigate the digital divide inclusive of UK citizens (e.g. the non-private household population). On 4th March, 2019, the Office for National Statistics released the report, 'Exploring the UK's digital divide: The scale of digital exclusion in the UK; those who aren't currently using the internet, how digital skills vary for different groups of the population and some of the barriers to digital inclusion'. Here, the report highlighted that poverty and regional locality were linked to the digital divide. For example, highlighting that lower income, and single adult households are less likely to have access to the internet, and regional disparities surrounding infrastructure. However, it draws from data that does "not include the non-private household population, which includes those living in caravans, communal establishments, temporary accommodation and homeless people" (p. 20). Here, authors state that the digital divide may be much wider. We agree.

Research must make every effort to be inclusive of populations- that are reported disproportionately to experience economic hardship. Specific efforts should be made to include young people in needs assessment activities. Working *as*, *with*, and *for* these communities, we see direct links between disadvantage and the digital divide. In the absence of data sufficiently inclusive of diverse disadvantaged populations, we provide the following anecdotal evidence from our professional practice:

- We speak to individuals regularly that simply cannot afford the equipment, and/or maintenance, and/or network costs to participate fully within an online environment.
- We know many individuals that are unable to download the NHS COVID-19 App as they do not have sufficient data allowances on their phone to accommodate it. Thus, some individuals are unable to use available tools to improve their safety, and that of others. Thus, management efforts associated with COVID-19 are limited, with an increased risk for economically deprived populations.
- Some are unable to participate fully in engagement activities because of the size of their device makes engagement challenging (e.g. a person on a smart phone may struggle to engage with chat functions as the text is too small to read comfortably).
- We have spoken to households where parents, children and sometimes extended families have only one device between them to connect online. Meetings have to be meticulously planned around the schedules of the entire household. This causes unnecessary stress for struggling families to engage with education and employment. It leads to some being excluded. It poses new challenges for organisers of educational and/or community engagement events.
- At times, network connections are only sufficient to enable some means to communicate (e.g. audio), but not all (e.g. video). This is stressful for presenters and participants as it limits group participation and cohesion. It may be of particular detriment to those with additional learning needs and/or disabilities. For example, a presenter or participant may rely on lip reading and/or visual cues for communication and is unable to watch

individuals who are speaking due to network limitations. Thus limitations for some, can further lead to limitations for others.

- Variations in network access within localities make planning processes more challenging and participation more stressful. For example, some areas- especially more rural communities - may have no network access, individuals living in a basement flat may have limited connectivity, network connection may vary within parts of a house and/or by time of day, and/or by weather conditions.
- We hear from individuals/households with clinical vulnerability to COVID-19 with front-line roles in education and health. They feel they could provide support to others via online platforms, but have not been provided with the tools to enable them to help others remotely. This skills waste is potentially disproportionately detrimental to front-line services employing key workers and other front-line staff (see our previous work).
- Young people who have experienced bullying either in-person or on-line may find digital communication especially daunting. Some say it is harder to have their voice be heard in online spaces. **A specifically youth-led recommendation on this submission is that the government does more to address bullying across all environments. Those leading sessions and events should tell participants upfront not to judge one another and get everyone to agree. They should also be aware that joining events and activities online from home can feel a bit invasive for some (i.e. like the outside is coming into your house).** Although these recommendations were made by young people for young people, it is likely that others would benefit from their implementation. **Efforts to better understand the digital divide must go beyond digital needs assessments, and consider why some potentially exclude themselves from participation.**

The Digital High Street:

Improved digital inclusivity necessitates narrowing the digital divide for households and individuals. However, it should also include efforts to narrow the digital divide inclusive of all types of businesses (including the self-employed) and organisations (including the public sector, charities, third-sector groups, arts and cultural groups, etc.). Focused efforts may include priority support for organisations helping fellow UK citizens, building their capacity to support others.

We are concerned that the change in narrative communicated by the government appears to target individuals. The government's message via campaigns such as, 'Fatima's next job could be in cyber', have suggested individuals should reskill and retrain to compete in the new COVID-19 era. However, Furlough schemes and other such initiatives have suggested that UK businesses retain the status-co. This does little to inspire digital innovation from within the employment sector and may lead to job losses. **We recommend that the national government, in partnership with local councils and local people, focus on building infrastructure and skills capacity amongst organisations.**

This argument is not new. Prior to the pandemic, there were growing calls for the investigation and investment in the 'Digital High Street' (see Digital High Street Advisory Board, March 2015, Warwickshire County Council, May 2018). However, this work focused primarily on retail and other such income-generating businesses and excludes others (e.g. third-sector groups, public services, self-employed). **We rather recommend investment in Digital High Street research, inclusive of the third-sector, public services and the self-employed. This will later inform investment support decisions.** This needs assessment is especially important when these provide services and/or support to vulnerable populations (e.g. an organisation supporting youth mental health). Additional targeted training and investment support may be considered for providers who's business is helping UK citizens and supporting them to meet the increased demands associated with this challenging time (see Canada's COVID-19 Economic Response Plan: support for organizations helping Canadians, 2020).

The inclusion of arts and cultural organisations in digital needs assessments is additionally important in the area of mental health where research suggests engagement is linked to improved outcomes (Kilroy et al., 2007). Many arts and culture organisations we work with played a pivotal role in community engagement and development prior to COVID-19. Some are unable to maintain this work due to a combination of financial restrictions, and limitations in their capacity, including skills and infrastructure, to employ a variety of digital methods to engage with their audiences. A study done by the team on the digital provision by cultural organisations during the UK lockdown period (March-July 2020) highlighted how these organisations targeted most of their digital offerings at their traditional audiences, while also experimenting with a variety of digital tools, such as live streaming and other social media platforms, to interact with communities (Samaroudi et al., 2020).

Nevertheless, there are still challenges for these organisations to be able to diversify their digital offerings in a way which is inclusive, takes into account the needs of vulnerable audiences and allows the institutions themselves to be resilient to the financial challenges brought by the pandemic. Taking the example of Fatima, perhaps she would not have to retrain if her community had inclusive digital access, and her ballet company had access to an online performance platform and an online shop to sell ballet paraphernalia. Increasing digital accessibility can help enable community engagement activities to take place online, and to diversify income streams.

Specifically on the point of the diversification of income streams, many UK businesses/organisations may diversify their income via engagement with pre-existing for-profit platforms (e.g. Amazon). This may be used to negate the argument for specific public investment into this type of infrastructure. However, many known platforms are not suitable for all types of sales. Despite the 2% Digital Services Tax imposed by the government in April of this year, tax contributions are proportionately minimal (BBC, Sept 2020). Thus, the reliance on existing pay-for-use platforms is not sustainable. Over time, it is likely to deplete the public purse of taxes that fund public services (such as those supporting physical and mental health, and education and employment). The current economy needs alternative options. For example, Royal Mail may potentially be brought back into public ownership and provide shipping discounts to organisations and consumers (e.g. offering free shipping within a local community

to encourage individuals to shop local). Collective partnership working between and across organisations may identify the most innovative, useful, and cost-effective solutions.

Collective problem solving should take place following completion of an inclusive assessment of community-based infrastructure, training and support. As we will identify in the next section, some are excluded from online data collection practices. Co-production (see Banks & Hart, 2018) may complement previously used research methodologies associated with digital needs assessments (see Warwickshire County Council, May 2018). This approach would enable a proportionate needs response, specifically protect those that support community health, and protect jobs across all sectors in struggling communities.

Digital Accessibility:

Digital inclusivity is about taking steps to improve digital access for all. Improving digital accessibility is an extension of this. It includes taking additional steps to ensure engagement within digital platforms is equitable, and does not exclude individuals on the basis of protected characteristics.

ONS (March, 2019) suggests that minority groups and/or those living in poverty are disproportionately impacted by insufficient digital tools and infrastructure, and less likely to be confident in their skills. For example on the subject of online shopping, almost double the percentage of disabled people expressed skills shortages, and a higher percentage expressed privacy concerns compared with non-disabled people (p. 22). Discussions around skills shortages here however fail to recognise that many websites and apps (outside the public sector) are not accessible to disabled people by design. Thus, the responsibility of addressing the skills shortage should start with efforts to develop the skills of designers to make things accessible. Disability charities are calling for increased web and app accessibility (see e.g. SCOPE, The Big Hack). **In line with these calls, we recommend that the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018 be expanded and inclusive of ALL websites and apps, including those originating from outside the public sector.**

As we raised prior to lockdown in submissions to the inquiry into 'The Experiences of Disabled Students in Higher education' (2019), online data collection tools that are GDPR compliant are not universally compatible with accessibility software. Thus, many members from disabled communities are unable to contribute to research utilising online data collection tools. Here, we additionally **recommended accessibility digital policy guidance be expanded to be inclusive of survey tools and operating systems**.

Changing policies to be inclusive of operating systems is especially relevant in the aim of improving access to education and employment. For example, in a higher education environment, students and lecturers are required to use Turnitin for assessment practices, despite Turnitin publicly stating it lacks accessibility functions. This creates a higher workload for disabled people as they identify and negotiate reasonable adjustments in order to access education and/or do their jobs. **Here, we recommended increased commitment towards**

universal design principles in line with recommendations by the Equality and Human Rights Commission, Jan 2018.

The current conceptualisation of 'universal design' rests on the principle of designing products, services and environments to be accessible to the widest range of individual abilities. In the UK, these principles are often associated with 'inclusive design' and with the contributions of British philanthropist, Lady Helen Hamlyn. It is important to recognise the contributions of UK citizens associated with this global movement, and to explore and celebrate our collective knowledge in this area. To do so, raises public awareness around inclusivity and encourages national pride. Similarly, celebrating the contributions of minority communities to online environments may increase social acceptance. We highlighted some of the specific digital contributions of disabled people here.

Banks and other financial institutions should undergo priority regulation surrounding accessible design. Some disabled people tell us they experience financial hardship because internet banking is not universally accessible, in-person financial services are reduced, and reasonable adjustments are lacking. COVID-19 has only amplified these issues. For example, because non-public sector online environments are rarely accessible, some authors of this submission have had to entrust others to help with banking and online shopping. As such, these individuals are at increased risk of identity theft and fraud as a direct result of inaccessible design. As steep raises in identity theft and fraud cases have been reported in the news (see e.g. Enterprise Times, September 30, 2020), **further research should investigate potential disproportionate impacts of fraud on disabled people linked to COVID-19**. More must be done to ensure disabled people have equal access to online environments, and maintain secure control of their finances.

Digital Data Accountability:

Improving data accountability includes taking steps to ensure that data collection practices are communicated transparently and in accessible formats.

The educators and practitioners among the authors of this submission, have experienced great challenges with moving practices online. This is because existing platforms lack a combination of privacy protection and/or features that enable diverse individuals to engage, including those that are limited by structural factors (e.g. network access) and, individual factors (e.g. disability). Many of us have experienced a combination of these limitations directly, and are motivated to ensure our online are safe and accessible. Yet, we are limited in this success. This is because choice is limited.

Many existing platforms (e.g. Zoom) have questionable approaches to privacy protection and data security (Boingboing, March 2020). Platforms such as Teams (which we use) provide relatively more robust privacy protections, allowing for compliance with GDPR. Yet even here, participants must be responsible in-part for their own privacy protections. For example, participants must individually remove posted comments that they do not wish to remain in the chat log, etc. These are safety concerns for all. Some of the populations we engage with have reason to be additionally cautious surrounding their privacy protections as identification could

pose a threat to their personal safety (e.g. looked after children, households with experience of domestic violence, etc.). We have found both real and/or perceived limits to privacy protection in online environments leads to disengagement. Without engagement, learning and support provisions cannot be adequately provided.

To mitigate risks, we recommend regulations associated with online privacy management practices, ensure privacy features are prioritised and transparently communicated. This should include the requirement for all digital environments (e.g. apps, websites, and operating systems) to produce privacy guides in easy to read and other accessible formats (e.g. video). It should additionally require up-front transparency surrounding data sharing partners.

Good practice does exist. The Guardian, for example, provides upfront disclosure of advertising partners and an opportunity to individually opt-out of data sharing with them, and includes a commitment to not collect data associated with some sensitive personal characteristics (e.g. race) without express permission (see e.g. Rightly, June 2020). Practices such as these, may engender trust, particularly with communities that experience present and historic inequalities. This is likely to increase engagement for improved practice.

Conclusion:

Social exclusion in the UK has long been associated with negative outcomes associated with education, employment, economic standing and both physical and mental ill health (e.g. DWP, May 2012). In today's climate, the lines between digital exclusion and social exclusion are blurred. For example, our young co-author very clearly expressed that efforts associated with reducing bullying, judgement and stigma across all environments may help online ones feel more inclusive to more people. Our disabled co-authors highlighted multiple barriers to engagement. Moving forward, conceptualisations of social exclusion may expand to consider the digital domain.

We have highlighted that the selection bias on research associated with digital environments may be a much larger issue than it initially appears, which is significantly reflected in digital practices and policies. In other words, it is less possible to change the attitudes and systems around digital inclusivity and accessibility without making the research representative of the whole of the population.

Summary of Recommendations:

Within 3 Weeks' Time:

- Minimise the reliance of online tools in the collection of data associated with the exploration of digital engagement and the digital divide.

- Raise awareness of inclusive design innovators from the UK such as Lady Helen Hamlyn as part of this year's UK Disability History Month theme.

Within 6 Months' Time:

- Develop a project to ensure all children have access to computers/laptops to support their educational attainment. This may draw from international projects such as the One Laptop Per Child (OLPC) project for young people living in developing countries.
- Explore the digital divide using data inclusive of populations associated with non-private households. Include opportunities for the consideration of qualitative data, in recognition that studies following a quantitative survey design may exclude some.
- Build digital capacity in businesses and organisations, working in partnership with them to identify needs and create innovative solutions. Targeted support should go to those groups that provide support to UK citizens, and may include public sector, charity, third-sector groups and arts and cultural organisations.
- Young people specifically recommended that the government does more to address bullying across all environments because some may exclude themselves from online environments if they do not feel their voice will be heard. We agree. We suggest anti-bulling programmes be co-developed with young people (see for e.g. Blackpool's 'Beat the Bullying' Charter). More research is needed to understand why some may not participate in online environments even when they have sufficient access to training, technology and infrastructure.
- Produce regulations associated with online privacy management practices, to ensure privacy features are prioritised and transparently communicated in online environments. This should include the requirement for platforms to produce privacy and access guides in easy to read and other accessible formats.
- Expand the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018 and require all online environments (websites, apps, online data collection tools and operating systems originating from outside and inside the public sector), to be accessible to all following universal and/or inclusive design principles. Full ratification of universal design (see the Convention on the Rights of Persons with Disabilities), the celebration of our inclusive design history, and associated accessibility accountability processes may be included within the proposed National Strategy for Disabled People.

References:

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