

HM Revenue and Customs

IT Accessibility Policy

Draft Equality Impact Assessment for Consultation

Document Control

<i>Title</i>	:	IT Accessibility – Full Equality Impact Assessment
<i>Status</i>	:	Draft
<i>Author</i>	:	Sean Smith, IMS
<i>Distribution</i>	:	
<i>Approved By</i>	:	
<i>Approval (signature)</i>	:	

Document History

Draft 0.1 (14.06.07)	:	Initial Draft based on HMRC Template
Draft 0.2 (02.08.07)	:	Draft issued for informal QA
Draft 0.3 (21.08.07)	:	Amendments based on QA replies
Draft 0.4 (23.08.07)	:	Amendments based on QA replies
Draft 0.5 (13.09.07)	:	Amendments based on QA replies
Draft 0.6 (18.09.07)	:	Amendments based on QA replies
Draft 0.7 (20.09.07)	:	Amendments based on QA replies
Draft 0.8 (26.09.07)	:	Amendments based on DD Comments
Draft 0.9 (08.10.07)	:	Final Amendments
Version 1.0	:	This Version

0.1 Contents

0. Management Summary	3
1. Introducing HM Revenue and Customs	5
2. Statutory Obligations and IT Accessibility	7
3. Consideration of Evidence	10
4. Assessment of Impact	20
5. Consideration of Alternatives / Improvements	23
6. Consultation	27
7. Decision by the Public Authority	28
8. Monitoring Arrangements	28
9. Publication of Results	28
Appendix 1 - HMRC's 'Golden Rules' for IT Accessibility	29
Appendix 2 - Consultation with HMRC Diversity Network Co-ordinators	30
Glossary	32

0.2 Contacts

Enquiries regarding this document should be addressed to:

Sean Smith
HMRC IMS Business Solutions
4NW Queen's Dock
Liverpool
Tel: 0151 703 8300 / 07808 946806

Email: Sean.Smith@hmrc.gsi.gov.uk

Paul Boyd
HMRC IMS Business Solutions
1st Floor Barkley House,
Castle Meadow Road,
Nottingham NG2 1BA
Tel 0115 974 0849 / 07799 340643

Email: Paul.Boyd@hmrc.gsi.gov.uk

0.3 Management Summary

In Great Britain public authorities have a duty to promote race, disability and gender equality. This consultation paper outlines Her Majesty's Revenue and Customs (HMRC) approach to the Equality and Accessibility of its IT Systems.

Equality screening of IT Accessibility was carried out across each of the nine specific diversity groups operating within HMRC e.g. Race, Gender, Age, Disability. A full list of each of the internal diversity groups involved in this review, and their response, is included at Appendix 2 to this report. Following this initial screening it was found that the main area requiring further examination was in respect of Disability.

On Disability, public authorities must, when carrying out their functions, have due regard to the need to:

- promote equality of opportunity for disabled people taking steps to take account of disabled people's disabilities even where that requires more favourable treatment;
- eliminate unlawful disability discrimination;
- encourage participation in public life by disabled people;
- promote positive attitudes towards disabled people, *and*
- eliminate disability related harassment.

This report addresses how HMRC seeks to meet its obligations in respect of these duties ensuring that ***“All Staff and Customers can access the full range of IS services provided by the Department, any potential barriers are identified and any necessary action is taken to remove or mitigate adverse effect.”***

Key Findings: Accessibility is important to HMRC. We want to get it right. Work has been going on for some years to improve the accessibility of our IT systems, to enable us to provide a better service for our disabled Customers and Staff. However, we accept that there is still room for improvement and are working hard to make these happen. A number of actions are already underway including:

- Working with others outside the Department on a range of accessibility issues including the production of updated international standards, production of best practice guidance, influencing suppliers, setting out the business case for accessibility and generally raising accessibility awareness;
- Reviewing, refining and implementing our current internal Standards, Guidance and Development Model for both web and non-web development;
- Involving all appropriate stakeholders including disabled people in the testing of new services and information content;
- Actively seeking the views of disabled Customers and Staff through research and feedback;

- Carrying out a programme to review the accessibility our legacy systems, developing approaches to improve their usability where appropriate;
- Providing better Helpdesk facilities and Provisioning processes to enable our staff to use our systems in their job;
- Introducing additional Learning Mentors to assist our staff who use Dragon software (building on the success of our approach for our JAWS users);
- Demonstrating our commitment to equality through the development of an IT Accessibility Communications Strategy to improve how we engage with, and respond to, issues of IT Accessibility raised by staff from all Diversity Groups.

The advantages of having IT systems that are accessible to all users are:

- Our Staff have equal opportunity to contribute to HMRC activity and are not discriminated against in their chosen career path;
- Our Customer's experience of dealing with HMRC is improved, making it easier for individuals and businesses to pay the tax and duty they owe and receive the credits and payments due to them.

Next Steps

This consultation paper is now issued for comment on our approach and content. We have invited comment from a range of Diversity Groups and have posted the consultation paper on our external website. Any comments on this consultative document and/or suggestions for how we could improve our approach in respect of IT Accessibility should be directed to the staff identified at Section 0.2 Contacts.

1. Introducing HM Revenue and Customs

1.1 HM Revenue and Customs (HMRC) was formed on the 18th April 2005 following the integration of the two former departments – Inland Revenue and HM Customs and Excise. HMRC's role is to protect society and to ensure the correct tax is paid at the right time, whether this relates to payment of taxes received by the department or entitlement to benefits paid. HMRC is one of the largest and most complex organisations in the UK – handling around £325 billion per annum in revenue and dealing with over 40 million individual and corporate customers. As well as collecting the bulk of tax revenue and paying tax credits and child benefit, HMRC is also responsible for strengthening the UK's frontiers.

1.2 We collect and administer:

Direct taxes – paid by the public and businesses on money earned or capital gained.

- Income Tax;
- Corporation Tax;
- Capital Gains Tax;
- Inheritance Tax;
- National Insurance Contributions.

Indirect Taxes – paid by the public and businesses on money spent on goods or services.

- Excise Duties;
- Insurance Premium Tax;
- Stamp Duty Land Tax;
- Petroleum Revenue Taxes;
- VAT.

1.3 We pay and administer:

- Child Benefit;
- Child Trust Fund;
- Tax Credits.

1.4 We protect society by enforcing and administering:

- Border and Frontier protection;
- Environmental Taxes;
- National Minimum Wage;
- Recovery of Student Loans.

HMRC’s Ambition

<p>Our role</p> <p>Administering the UK’s tax and customs systems.</p>	
<p>Our aim</p> <p>Ensuring society’s financial well-being.</p>	
<p>What we stand for</p> <p>At HM Revenue & Customs, we know most people and businesses want to do what’s right – to pay what they owe and claim only what they’re due.</p> <p>We’re committed to making it as easy as possible for our customers (taxpayers, claimants and others) to get it right.</p> <p>We protect society by dealing firmly with anyone who intentionally avoids their responsibilities.</p>	
<p>What we value most in our actions and behaviours</p> <p>Living by the Civil Service Code:</p>	
Customer Focus	Putting our customers at the heart of everything we do; understanding them and responding to their behaviours and expectations.
Trust	Believing our customers are honest unless we have good reason to doubt it. Being trustworthy and trusting each other.
Support	Helping our customers to meet their obligations and receive their entitlements. Working together and taking pride in delivering great performance.
Protect	Being vigilant and acting decisively in protecting society. Behaving professionally and with integrity.

2. Statutory Obligations and IT Accessibility

- 2.1 Public authorities are required to have due regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.
- 2.2 Under the Northern Ireland Act 1998, all public bodies in carrying out their functions relating to Northern Ireland are required to have due regard to the need to promote equality of opportunity:
- between persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;
 - between men and women generally;
 - between persons with a disability and persons without; *and*
 - between persons with dependants and persons without.
- 2.3 In Great Britain public authorities have duties to promote race, disability and gender equality.
- 1.3 On race, public authorities must, when carrying out their functions, have due regard to the need to:
- promote equality of opportunity between people of different racial group;
 - eliminate unlawful discrimination between different racial groups;
 - promote good relations for people of different racial groups.
- 2.6 On disability, public authorities must, when carrying out their functions, have due regard to the requirements of the Disability Discrimination Act (DDA) and our key duties within that act. In particular, we must:
- promote equality of opportunity for disabled people taking steps to take account of disabled people's disabilities even where that requires more favourable treatment;
 - eliminate unlawful disability discrimination;
 - encourage participation in public life by disabled people;
 - promote positive attitudes towards disabled people; *and*
 - eliminate disability-related harassment.
- 2.6 On gender, public authorities must, when carrying out their functions, have due regard to the need to:
- promote equality of opportunity between men and women generally
 - eliminate unlawful discrimination and harassment of men and women generally (including transgender)

2.7 Purpose of this Document

HMRC's approach to Equality Impact Assessment meets the statutory requirements set out above. Through this approach, HMRC will review all its policies and activities with respect to Diversity and Equality.

This document sets out our impact assessment on our IT Accessibility policy, and its associated activities. Its purpose is to explain how HMRC is addressing its compliance with the regulations of the Disability Discrimination Act in respect of IT Accessibility.

We wish to consult both externally and internally with representative bodies for disability groups and individuals to ensure that our approach meets their needs and to receive feedback on how our approach may be improved. Feedback may be provided in writing to the contact address outlined at Section 0.2 or on-line by completion of the on-line questionnaire which accompanies this report on the HMRC website. The closing date for responses is Monday 31st December 2007.

2.8 IT Accessibility Policy Aims

The aim of the policy is to ensure that: ***“All Staff and Customers can access the full range of IS services provided by the Department, any potential barriers are identified and any necessary action is taken to remove or mitigate adverse effect.”***

The various Departmental Equality Schemes (Race, Gender, Disability etc) require HMRC and any of its third party suppliers to take the needs of all users into account when providing (building, changing, running, supporting etc) Information Systems (IS). Where appropriate, all reasonable steps must be taken to address and resolve any issues raised.

The policy therefore applies to all staff in HMRC involved in systems development, and to anyone providing systems on our behalf. HMRC's Information Management Solutions (IMS) division acts as the prime supplier of IS services to HMRC. ASPIRE is IMS' strategic partner - a consortium of companies that provides outsourced IS services to HMRC including systems development. IMS also has its own in-house development facility, Solutions Development and Delivery (SDD), and oversees the development of small scale 'Business Developed Applications' by non-IMS staff. HMRC's IT systems are used by its staff and members of other Government Departments (internal users), and by our Customers. The IT Accessibility Policy specifically applies to:

- HMRC's externally facing systems – our web based services (e.g. on-line tax returns) and our Internet site (external users);
- The internal systems, used by our staff (and to a limited extent by staff from other Departments) to administer our various tax and customs related activities;

- Any other IS tools used by our staff (e.g. Word, Powerpoint, Mail, Project, development tools);
- Any hardware used by our staff, including tools for homeworkers and staff working away from the office (e.g. Laptops, Handhelds, BlackBerries).

IMS is currently reviewing and revising its IT Accessibility policy and processes. This work translates into two broad directions:

- The forward look - ensuring that what we provide in the future meets the needs of all users i.e. that IT Accessibility is systematically included in all requirements analysis, system development, change, governance (via gateway reviews and acceptance testing) and procurement.
- The historic look - confirming that what we already provide also meets our users needs by reviewing our legacy systems against our Departmental standards. This review will follow a prioritised programme to identify and address accessibility problems.

2.9 IT Accessibility Policy Stakeholders

The internal and external stakeholders of this proposed action are:

- Information Management Solutions (IMS)
- ASPIRE and any other third party IS Suppliers to HMRC
- Solutions Development and Delivery (SDD)
- Communications and Marketing (CaM) (Intranet)
- On-line Services (Internet)
- HR + Learning Directorate
- Estates and Support Services Directorate
- Business Developed Applications Forum (BDAF)
- Individual Customer Units (ICU)
- Internal Users of IS Systems
- HMRC On-line Services Accessibility Steering Group
- HMRC's Disability Equality Scheme Steering Group (DES SG)
- HMRC's Diversity Network Co-ordinators (one each for Diversity area – gender, race, age, disability etc)
- HMRC's IT Accessibility Forum
- Departmental Trade Union Side (DTUS)
- External Customers
- Outside Diversity bodies (i.e. RNIB, RNID, Disability Rights Commission)
- Business Link / Direct Gov / Other Government Departments

3. Consideration of Evidence

3.1 Methodology

In carrying out this Equality Impact Assessment (EQIA), a team led by IMS has followed HMRC's guidance for such studies. Initially, a screening exercise of existing IT Accessibility policies, procedures and measures of performance was carried out by:

- Consulting each HMRC Diversity Network Co-ordinator;
- Consulting the HMRC Disability Network Co-ordinator in particular to gather evidence from a series of workshops with staff;
- Consulting the Departmental Trade Union Side (DTUS);
- Creating and consulting an HMRC 'IT Accessibility Forum', consisting of the Disability Network Co-ordinator and appropriate staff from HR, Learning, On-line Services (re Internet), Communications and Marketing, CaM (re Intranet), ASPIRE and IMS (including representatives from Solutions Development & Delivery and the Business Developed Applications Forum);
- Examining current HMRC Standards and Best Practice against external equivalents;
- Reviewing HMRC's IT Provisioning and Helpdesk processes and statistics;
- Considering the results of a study conducted by an external agency, which compared eight of our major corporate systems against our internal standards;
- Considering the results of a study conducted by an external agency for our On-line Services Team, which compared six of our major on-line services and our Internet site against our internal standards;
- Consulting our On-line Services Team about complaints and any other feedback on IT Accessibility received from our external users;
- Considering the results of an external review commissioned by our On-line Services Team to understand the perspective of people with different levels of disability using the HMRC website, and develop insights for how the site experience can be optimised for those individuals.

3.2 The screening exercise identified a number of IT Accessibility issues, and at a scale that warranted progression to the Full Impact Assessment Stage. We have continued to gather evidence since then by:

- Gathering HMRC Particular Needs user statistics (adaptive and assistive tools used, corporate applications used, locations etc);
- Gathering data on IT Accessibility cases raised by staff through HMRC's Complaints and Grievance process;
- Joining the recently formed Cross-Government IT Accessibility Group;
- Seeking information on best practice through the Employers' Forum on Disability (EFD) and, through them, liaising with representatives from Industry;
- Reviewing HMRC's IT Provisioning and Helpdesk processes alongside their equivalent and related Disability processes in the Department, specifically those for HR, Estates (including furniture) and Training;

- Following up the study of the eight major corporate systems by consulting within IMS on issues raised and obtaining initial cost estimates from ASPIRE;
- Continuing to consult our On-line Services Team, including taking into account their role as design authority for the external on-line channel and the study they sponsored into barriers preventing disabled Customers accessing our on-line services (the Quickheart Study).

3.3 Internal and External Consultation on Diversity Scope

Internal / Staff: The screening exercise reviewed IT Accessibility in respect of all HMRC Diversity areas. Feedback from our Diversity Network Co-ordinators showed that the main Equality area impacted by IT Accessibility was Disability. Some non-IT Accessibility issues were raised by other Diversity Groups (see Appendix 2), and these have been forwarded to the relevant Departmental policy owner for consideration.

The HMRC Corporate Responsibility and Diversity team has asked that impact of “language” is considered in future reviews. For example, Customers who do not speak English may be impacted by our external web applications. Although we have no legislative requirement to do this (other than under the Welsh Act), the Department is currently addressing how this issue should be taken forward as part of our wider policy approach, and a study is also underway in On-line Services into need for language support. This issue therefore does not form part of this review.

Similarly, it was also pointed out that British Sign Language (BSL) users may be impacted by our external web applications. It may be possible to include BSL signing avatars on a web site or to offer advice about access to interpreter services along with accessibility advice on the website, as well as in other “help” areas. This proposal has been passed to our On-line Services team for further consideration.

External / Customers: Customers are invited to complete an on-line questionnaire following any web based interaction. Analysis of these questionnaires is carried out on a continuous basis by our On-line Services Team to alert the Department of any particular problems, trends or hot topics. This analysis shows minimal feedback from our Customers on IT Accessibility. However, our On-line Services Team are aware from other sources, not least of all from the results of the Quickheart study described below, that Accessibility is an issue for our disabled Customers.

In conclusion, this Impact Assessment therefore primarily (though not exclusively) addresses our duty as an employer and service provider to meet our obligations under the DDA and we continue to monitor our approach in all other areas of Diversity.

3.4 The Quickheart Report

A recent study (the Quickheart Report), commissioned by our On-line Services Team, looked at customer satisfaction with the accessibility of HMRC's website. Its key objectives were:

- To understand the perspective of people with different levels of disability using the HMRC website, and develop insights for how the site experience can be optimised for those individuals.
- In particular, to examine how the site can be made easy for disabled individuals to access its information and services, and go beyond the DDA guidelines in terms of customer experience.

A key finding of the study was that many disabled users had general IT issues – knowing how to use the internet, having concerns about 'getting it wrong', not knowing how to use accessibility features provided with their PCs etc. The study concluded that we need to address these issues as well as looking at our specific on-line services e.g. by providing more help and alternative channels for supporting on-line service users.

The study team conducted their research by interviewing existing users. They were aware however that potential users of our systems may be deterred for a range of reasons, including both their physical or cognitive ability and their confidence and knowledge of using IT systems. The team noted the importance of adapting the language we use on our systems so that it doesn't prevent our customers from interacting with us through this medium, and that we try to use straightforward language on our sites and avoid the use of jargon or technical phraseology.

The research found issues arising for specific groups:

Blind Users experience a very different internet to sighted users:

- Many 'short cuts' such as post code finders and security measures on the internet are fundamentally 'broadband' and 'visual' – not linear and readable – and are especially difficult to navigate for non sighted users.
- Screen readers are an evolving 'early adopter' technology:
 - fast keys often clash with keyboard functionality of screen readers;
 - major problems with compatibility with form filling applications.

Partially Sighted Users find it hard to use the screen for long periods and concentrate on detail for too long:

- Poor readability - Current sites rarely have large enough fonts or clear enough contrast e.g. HMRC Tax Credits is almost unreadable for most partially sighted users; both a function of size of text and lack of contrast with background.
- Changing the settings usually generates other usability problems such as words disappearing off the page, making text hard to print and loss of formatting.

Colour Blind Users - Of all disabled users, the experience of being colour blind was the hardest for a 'colour seeing' person to visualise. Colour blind people are literally blind to their problem - they don't know something isn't there if it is in a colour they can't see:

- colour shades and blocks of colour create blind spots;
- 'visually interesting' sites are often the hardest to read;
- little awareness of options to turn off colours within browsers.

Users with Learning Difficulties - Many will not have their own computer. When they do use a computer, they are likely to have a supporter with them:

- There is a tension between the idea of advocacy and empowerment of people with learning difficulties and the task of supporting and being an advocate. In reality this often means the supporter doing the jobs that have been given to the person being supported.
- Trying to provide access to everything on a site as complex as that of HMRC actually disempowers people with learning difficulties, by overloading them with information and making it impossible for them to understand anything at all. Simple forms are very challenging let alone multiple box entry forms on a website – for both supporter and respondent alike.

Physical Disabled Users - A computer requires a precision of action and control that is often not easily possible for people with a physical disability:

- Surfing can be a very frustrating process of error and re-working. This often leaves individuals exhausted after 20-30 minutes of surfing not least because sitting at a desk or standard PC itself can be uncomfortable for long periods.
- Poorly set up hardware, or a lack of knowledge or access to more usable mouse / keyboard solutions, can be significant issues.

3.5 Evidence of Grievance or Complaint against HMRC

As stated above, our On-line Services Team has received minimal feedback from our external Customers on IT Accessibility – at most 3 to 4 per month. This compares to a total of 34,117 feedback comments received on-line during the 2006-07, reporting year. All comments received are passed on to the On-line Services Team. We are unaware of any formal complaint cases on the grounds of IT Accessibility. However, we do not assume that this implies that it is not a significant issue for our customers.

Similarly, there have been few internal formal complaints and grievance cases raised by our staff strictly on the grounds of IT Accessibility over the past few years, although it is likely that IT Accessibility may be a component part of a number of complaints cases. Feedback from the Departmental Trade Union Side (DTUS) and from workshops run by our Disability Network make it clear that IT Accessibility is a significant issue for our disabled staff, especially those with a high level of need.

3.6 Assessment of HMRC Systems

The Department has over 650 corporate systems. Of these, 20+ are externally focussed e.g. On-line tax returns. In addition, we have some 4000 'Business Developed Applications' for use by staff. These are largely built using MS Office type applications e.g. Excel spreadsheets.

Internal Users (Staff): Processes for assessing and addressing need have been in place for some years (and are currently undergoing revision). The Department provides trained Display Screen Equipment (DSE) Assessors and access to Occupational Health Nurses. Of our approximately 85,000 staff, we have several thousand who use ergonomic mice and keyboards, and similar tools.

We also have around 500 staff with a high level of need i.e. those who use one or more of Dragon, JAWS, Lunar etc, specialist software tools helping with accessibility. Between them, these 500 users have access to around 120 corporate systems. Much of our accessibility effort is directed towards making our systems available to them (e.g. producing standards for use in system development).

In this context, we reviewed eight major corporate systems against our internal standards i.e. our 'Golden Rules' (see Appendix 1). The rules have been developed by our ASPIRE colleagues to provide pragmatic guidance for IT system developers. The rules were developed by the business and Aspire to provide pragmatic guidance for IT system developers. They are based on observations in the field about the major barriers to accessibility within our systems and also reflect the main themes of various international standards. Overall compliance to these rules varied between systems from 55% to 74%. Average compliance to specific rules varied from 37% for rule 8 (Support Macros and Shortcuts to personalise and to increase productivity) to 93% for rule 1

(Provide a full keyboard-only interface with complete logical tab order, shortcut keys for efficient use and a shortcut to the first control in the tabbing sequence). It is possible that rule 8 fared poorly because many of our systems do not support macros (rather than not providing shortcuts) since macros specifically are not required for the business process.

Our conclusion from this review was that it was likely that many of our systems, especially our older ones, are not as accessible as they could be. In addition to identifying a need to review our systems we also concluded that we needed to review the rules themselves to provide better guidance for developers and to ensure that future systems are better designed and fully DDA compliant.

We followed up the review of our legacy systems by consulting ASPIRE and asking for costings for changing these systems, (at least for those of the eight that are not currently being replaced), to ensure that they were 100% compliant. Initial high level estimates indicate that this would cost several million pounds. These systems are extensive and each of their screens would have to be individually reviewed and amended.

We concluded from this that examining systems from a purely IT point of view, system by system, with the intention of making them 100% compliant was not an ideal approach. In many cases, it may be that reasonable adjustments could be made in different ways. Also, we needed to take into account that individual users may need to use a number of systems in their day to day work, and we need to see how they worked together. We therefore determined that we ought to conduct a systematic review of our legacy systems from a 'role based' user perspective.

Our Business Developed Applications, (locally developed applications, usually created to assist specific business units e.g. Microsoft Excel Spreadsheets etc) are also covered by the remit of this EQIA. A review and consolidation process is underway for these systems. It is known that some do not meet the Business Developed Applications Forum's (BDAF) current accessibility standards and action plans are being developed to address this.

External Users (Customers): Our on-line services have a considerable user base, the largest supporting 4m customers. As previously stated in our outline methodology (para 3.1), six on-line applications and our Internet site were reviewed against our internal standards for web-based systems. These standards are based on the World Wide Web Consortium (W3C) web accessibility guidelines – compliance to level "A" is now mandated for all Government Departments but this may soon move to "AA" as a result of a consultative document to be issued to all Government Departments in November 2007. All reviews were completed in 2006. Two fully met the 'A' standard, three were close (70-90% compliant), one significantly fell short. The high level area of the Main Internet Site was 60% compliant. None met the 'AA' standard. The On-line Services Team had already concluded that action is needed to address these findings and those of the Quickheart study mentioned above. There are no current plans to move to "AAA" standard in the future, however, the review team recommend that this should be a longer term aim of the Department.

3.7 Development Standards and Best Practice

Development Standards exist for both our Internal and External systems. These include all systems used by our staff and by our external customers (via web based applications). International standards for both web and non-web development are now quite old. W3C and the ISO are in the process of updating these though, in the case of web developments, technology may be advancing faster than standards can (e.g. with respect to 'Rich Internet Applications').

This may underlie a problem HMRC faces. With the move to 'commercial-off-the-shelf' development, we increasingly rely on the providers of IT products to make those products accessible. In some cases, however, accessibility is an issue. We need to ensure that appropriate standards are built into our procurement processes. We also need to engage with suppliers to encourage them to ensure accessibility is built into their products.

From discussions with other Government Departments and, through the EFD, with the business community, we recognise that this is a shared objective. We feel that revised standards together with appropriate common best practice would help to address the issues we all face.

In addition, as part of its continuous improvement initiative, HMRC is revising its own IT development model. This incorporates four 'transition gates', separating the major stages of our model (Viability, Define, Design, Build, Implement). The model applies to the change and development of all corporate systems including on-line services. As already stated, HMRC has its own internal standards. These are backed up by good practice guidance. From comparison with literature and following discussion with colleagues from other Departments and businesses, our standards and practices are in line with those of others. We now need to ensure that our current accessibility standards and guidance are brought into line with our revised development model, and that accessibility is adequately incorporated into each of the transition gates (e.g. Transition Gate 4 which requires applications to have successfully passed testing before they can be accepted into the live environment).

On-line Services perform a Design Authority role throughout all stages of the Development model to ensure that all new external on-line services meet standards.

Accessibility testing does currently take place – it is a function performed by ASPIRE's Accessibility Team. They also test new types of hardware and software tools brought into use in the Department. Some of our systems are quite old and developed before IT Accessibility was recognised as an issue. There is some anecdotal evidence that, in the more recent past, testing was not as complete as it could have been. Mandating testing, to an agreed set of criteria in the transition gates should resolve that issue.

Business Developed Applications follow their own development model. Accessibility standards and testing are included within this.

Two other aspects of Accessibility arise. Firstly, there is a need to consider the wider range of Diversity and not just Disability. Secondly, we need to consider the relationship between accessibility and usability i.e. to ensure that our systems are not just technically 'accessible' but also as easy to use as possible. In either case, poorly designed systems may be so difficult to use that some Diversity groups may in effect be deterred from using them. For our on-line services, project guidance and support is in place to help with requirements definition. Specifically, we aim to ensure that the target user (customer) base is assessed, that the needs of these users are identified and addressed appropriately. We need to ensure that similar steps are taken when defining the requirements for internal systems.

3.8 Helpdesk and Provisioning

One aspect of complaint in the past has been the time it has taken to provide our staff with any assistive and adaptive tools they need (following appropriate assessment of needs), and poor service for our Particular Needs community from our Helpdesk. Both our Provisioning and Helpdesk processes have been internally reviewed and improved in the course of the past year. Statistics show that, since April, a very high proportion (89%) of Provisioning requests have been met within ten working days (from order to delivery) and similarly that the significant majority (90%+) of Helpdesk calls are resolved within five working days, with three quarters being resolved within one day. With respect to the latter, ASPIRE now have in place two levels of dedicated Accessibility support (the higher level being ASPIRE's Accessibility Team). However, more needs to be done, in particular to ensure that processes covering HR (e.g. medical assessment), estates (building adjustments and furniture) and training co-ordinate with those for IT. On-going work has identified opportunities for improvement. HMRC will continue to monitor and improve these processes by closely monitoring performance levels against agreed targets and satisfaction levels.

A workshop conducted in July 2007 brought together all relevant stakeholders in the provisioning of assistive tools and support processes for staff within HMRC. The main purpose of this workshop was to fully understand the processes involved, identify best practice and highlight areas for improvement. Outcomes from this workshop are being reviewed and proposals for taking issues forward will be published by the end of October 2007. As part of this review the team will look at how success is measured in providing this support.

HMRC does not provide assistive hardware or software for our external Customers. For our On-line services, we do provide telephone support including some support on IT issues.

3.9 Communication

Standards and guidance are only useful if those who need to use them know where to find them. A standards and disability awareness exercise was run for IMS and ASPIRE staff when the HMRC Golden Rules were introduced. A new exercise will be needed when the Development Model is updated as described above. This will supplement the revised Diversity Awareness training that HMRC has just introduced and that all staff now have to undertake.

On-line services are running a programme of stakeholder engagement to ensure that IMS and ASPIRE are aware of the standards we have developed for external on-line service development. We have placed all our standards in an eRoom, which became available to our external developers from August 2007.

Similarly, Helpdesk and Provisioning processes will only work if staff know what they are and how to use them. Communications was raised as an issue in the HMRC Disability Network workshops conducted during 2006 and an internal Communications Plan is now being developed and implemented.

4. Assessment of Impact

4.1 Overview

There is sufficient evidence to show that IT Accessibility is an issue for disabled users both internally, for our staff and externally, for our Customers. All our staff are required to use IT for at least some parts of their work. With on-line services becoming increasingly used in the UK, poorly designed systems may deter or even prevent disabled Customers from using them. The key advantages of having IT systems that are accessible to all our users are:

- Our Staff have equal opportunity to contribute to HMRC activity, and are not discriminated against in their chosen career path;
- Our Customers experience of dealing with HMRC is improved, making it easier for individuals and businesses to pay the tax and duty they owe and receive the credits and payments due to them.

The Department also recognises that IT Accessibility can impact on other Diversity Groups, both within our staff and within our Customer base. Steps need to be taken, particularly for our on-line services, to ensure that the target user base is assessed and that their needs are addressed appropriately.

HMRC's aim for IT Accessibility is that ***“All Staff and Customers can access the full range of IS services provided by the Department, any potential barriers are identified and any necessary action is taken to remove or mitigate adverse effect.”***

4.2 Impact Assessment on External Disabled Groups

Poor systems design has the potential to deter disabled users resulting in low participation or in some cases exclusion from on-line services and low take up of on-line benefits and e-services.

The evidence from the Quickheart study, and from the independent review of six of our on-line systems and our Internet site, tell us that we can do more to improve their accessibility. The lack of direct feedback from Customers implies either that they are reasonably content with these systems, that they are unwilling or unable to raise issues with us or that take up by the disabled community is much lower than we currently believe. Our conclusion is that we need to do more work. As set out in the next section, we are already committed to improving the accessibility of our on-line services and we are taking steps to investigate take up levels.

4.3 Impact on Specific Customer Disability Groups

We have no evidence that one group of disabled Customers is being disadvantaged more than another. Each group has accessibility issues - the rigorous enforcement of standards and the provision of good quality support should address these.

4.4 Impact Assessment on Internal Disabled Groups

Whilst the Department has put much resource into making its systems accessible to its disabled staff, more needs to be done. As previously stated, we have around 500 users of tools such as Dragon and JAWS who, between them, have access to around 120 corporate systems. ASPIRE's Accessibility team is a dedicated resource who work with users to adapt job procedures (this includes writing 'scripts' for Dragon and JAWS, enabling them to interact more effectively with our corporate systems). Our HR&L section also provides dedicated 'Learning Mentors' for our JAWS users.

However, we know from our research that our systems could be more accessible than they currently are. Also, our disabled users have raised a wide range of IT accessibility issues and problems over the past few years. These include:

- The considerable time it has taken for their need to be assessed and appropriate software and hardware to be delivered and installed
- Inappropriate helpdesk responses, including the difficulties of trying to obtain support from helpdesk staff who do not understand their situation
- Corporate systems that are only partially accessible or, in some cases, very difficult to use
- Changes to corporate systems such that previously accessible applications suddenly become inaccessible.

Staff have reported various impacts of these issues and problems, including:

- Frustration and loss of morale, stemming from the impression that some staff in areas developing or providing IT do not understand their needs, or do not value them
- Concern that they may be held accountable for a drop in personal performance, even though the cause of this may be factors outside their control (e.g. accessibility related hardware or software problems)
- Concern that their needs may not be taken into account in future Departmental changes e.g. the introduction of 'hot-desking' or the replacement of accessible legacy systems with newer but less accessible applications.

Our conclusion again is that we need to do more work. As described in Section 3 above, we have already taken steps to improve our Provisioning and Helpdesk processes, we are currently ensuring that our internal standards are integrated with the HMRC Development Model and we are developing a communications plan. We are also committed to improving the accessibility of our corporate systems and, as set out in the next section, are developing a user based programme to review our legacy systems.

4.5 Impact on Specific Staff Diversity Groups

We have no evidence that one group of staff is being disadvantaged more than another.

5. Consideration of Alternatives / Improvements

5.1 Introduction

It is clear from consideration of the evidence and conclusions presented at Sections 3 & 4 of this report that there are a number of areas relating to IT Accessibility that require further review. A number of proposals have been made for improvement. Some have already commenced but others are still under consideration. The main areas impacted by this include:

- **New Systems / Changes** - Standards, Guidance, Development Model (covering both internal and external systems).
- **Legacy Systems** - Audit programme and approach for internal systems. Current work programme for on-line services.
- **Helpdesk and Provisioning** - Assessment, Supply, Installation, Training and Helpdesk Processes (internal only).

5.2 New Systems / Changes to Systems

We are reviewing our current internal Standards, Guidance and Development Model for both web and non-web development. We are taking steps to ensure that our standards are firmly embedded in our Development Model including the Transition Gates, and are written in clear and practical terms. Within this, we will liaise with our colleagues in Testing to ensure that adequate testing occurs, and that opportunities exist to involve staff with disabilities in this testing (this already happens to some extent). Similarly, we will liaise with our colleagues in Procurement to ensure that our standards are adopted there too.

As part of the above, we will ensure that those staff involved with setting requirements understand the HMRC Accessibility standards, and have sufficient guidance and support. This will cover both internal and external systems, all relevant areas of Diversity (not just Disability) and requirements for usability. It will also include guidance and support for assessing the target user population.

We are working with others outside the Department on a range of accessibility issues including the production of updated international standards, production of best practice guidance, influencing suppliers, setting out the business case for accessibility and generally raising accessibility awareness. This includes working at a cross-Government level and at a cross-Industry level.

5.3 Legacy Systems - On-line Services

Our strategic approach to ensuring adherence to minimum accessibility levels across the current website is to adopt a realistic and planned approach to identifying and implementing improvements. We will do this on a priority basis, balancing factors such as level of usage, level of current adherence to accessibility standards, operational and technical cost to improve, and business and political drivers. However, as already stated, take up levels might be being adversely affected by accessibility. We therefore intend investigating take up of our services by the disabled community. Once achieved, we will look to target any areas of low usage, to check if accessibility and usability are causing an underlying problem.

We will ensure that operational processes are in place to maintain accessibility of live content and services.

We will involve all appropriate stakeholders including disabled people in the development and testing of new services and informational content.

We will actively seek the view of disabled users on the quality of our website through research and feedback

One key aspect in addressing the legacy accessibility issues is that we intend delivering many of our on-line services through an accessible portal. As we transfer our services to the new portal they will be modified to meet new portal standards, one of which is W3CAA.

This will take some time and the programme as a whole will have to deal with developing the portal and implementing new systems, as well as making these modifications. However, the benefit of delivering a consistent and accessible portal will be considerable. Within this, steps will be taken to build accessibility and usability features into the portal (e.g. better help) and improving support (e.g. alternative channels). We are also working with the HMRC Disability Network representatives in developing a new HMRC Website Accessibility statement. This will help disabled users to customise the HMRC website to meet their individual needs.

5.4 Legacy Systems - Internal Systems

With a considerable legacy estate, a rolling review programme is required. This may have to run over a year or more, with priority systems being reviewed first. Priorities will be determined by looking at those systems with the highest number of Particular Needs users, coupled with views from a survey of our Particular Needs users to run in the next few months to establish their key issues and concerns.

The programme will not run system by system, but will be user focussed i.e. it will look at typical user roles, the work they have to do, the systems they have to use and the problems they encounter. From this we will identify reasonable adjustments. In some cases this may involve amending one or more systems. In other cases, it might involve changing the job design, improving the use of our accessibility tools (Dragon, JAWS etc) or better communications and guidance.

5.5 Helpdesk and Provisioning (Internal Only)

Helpdesk and IT Provisioning processes have been reviewed in the past year and changes made. **We will review and improve the quality of the monthly statistics, ensuring that they are analysed and findings reported to the Disability Network Co-ordinator.** A “Service Level Manager” role has been created to oversee this.

We are also currently reviewing the wider end to end provisioning process for our disabled users i.e. from assessment of need through provision of IT and furniture to training and ongoing support for both the individual and their manager. A number of issues have been identified, and the review will take into account for example the introduction of revised HR processes. This review will also stress the importance of the Line Manager’s role in arranging for people’s needs to be identified, assessed and supported.

Although HMRC adopts a common approach to the support of all users, it would be fair to say that more progress has been made in the support of our JAWS users than in other areas. Historically JAWS users tended to work in non tax specific areas (e.g. telephony). Following the introduction of Learning Mentors, technical training is now provided to these users on a one to one basis allowing them to work on an equal playing field leading to career progression opportunities in a tax specific environment. In general, users of Dragon, Lunar and other assistive technologies may not have been affected to the same extent as their disabilities did not impact as greatly on their ability to undertake technical work. However HMRC does accept that more needs to be done for these users. Therefore **HMRC are now introducing additional Learning Mentors to assist those users, in particular Dragon users, who do experience some difficulties.**

5.6 Communication (Internal Only)

To support the above, a Communications Plan is being developed and implemented. This covers a number of messages to different audiences including standards to developers and testers, helpdesk and provisioning processes to the wider Department and sources of support and information for existing particular needs users.

We will also use this approach to demonstrate our commitment to equality, by seeking to raise general awareness of IT Accessibility issues and by clearly stating HMRC’s policy on Disability. In particular, the need to:

- promote equality of opportunity for our disabled Customers and Staff, including the need to take account of disabled people’s disabilities even where that requires more favourable treatment;
- eliminate unlawful disability discrimination and disability-related harassment;
- encourage participation in public life by our disabled Customers and Staff.

The Communications Plan will also set out to ensure positive attitudes towards our disabled Customers and Staff are promoted by all HMRC staff by setting out the benefits the Department sees in making our systems accessible.

6. Consultation

HMRC wishes to consult as widely as possible on the preliminary findings and recommendations contained in this draft EQIA and the following actions are proposed.

Consultation Process:

Stage One - Informal Consultation

- Internal consultation across all HMRC sections involved in Diversity and IT Accessibility.
- Informal Consultation with a number of external representative groups. These will include other Government Departments (DWP), Office for Disability Issues, Disability Rights Commission and RNIB. This consultation will take the form of issuing the written report followed by one to one interviews (where requested) to discuss input to the EQIA report. This will enable the review team to impact a cross section of internal and external views prior to completion of the final draft.

(This stage is now completed)

Stage Two - Formal Consultation

- Following completion of the informal consultation we will reflect comments in a final consultation paper which will be issued to consultees listed in our Equality Scheme and to any member of the public on request.
- A copy will be posted on HMRC's website and on the intranet
- Meetings will be held at appropriate times and venues with stakeholders
- The report will be made available on request in alternative formats.

The closing date for responses to the formal stage of this consultation process is Monday 31st December 2007.

7. Decision by the Public Authority

Following the formal consultation period and consideration of the findings from the consultation, HMRC will reach a decision in terms of the EQIA process and the final IT Accessibility policy and will ensure that such decisions are implemented.

8. Monitoring Arrangements

The changes to our IT Accessibility policy and practices will be monitored and reviewed in three ways:

- Progress will continue to be reported to the IT Accessibility Forum – the forum meets every four to six weeks. This group includes the Disability Network Co-ordinator to whom Provisioning and Helpdesk statistics and issues will be reported.
- The Department's Disability Champion, a member of the HMRC's Board, chairs the Disability Equality Scheme's Steering Group. Progress will be reported to this Group quarterly.
- IT Accessibility is a key business objective for IMS and a personal objective for the Chief Information Officer, also a member of the HMRC's Board. Progress is reported fortnightly up through the management chain.

The results of the monitoring will be widely and openly reviewed. If monitoring shows that the revised policy does not provide a positive impact or if opportunities arise which would allow for greater equality of opportunity to be promoted, HMRC will revise the policy.

9. Publication of Results

The outcomes of this EQIA will be posted on HMRC's website and its own Intranet site and will be available in different formats on request where appropriate.

Appendix 1

HMRC's 'Golden Rules' for IT Accessibility

1. Provide a full keyboard-only interface with:
 - i. complete logical tab order;
 - ii. shortcut keys for efficient use;
 - iii. a shortcut to the first control in the tabbing sequence.
2. Provide a visual focus indicator that tracks the input focus.
3. Allow user-selectable colour for all components, text and background.
4. Ensure controls, graphics and buttons labelled with alternative tags.
5. Uniquely identify every link on a page.
6. Place a unique identifier on each window.
7. Ensure switchable fonts (the RNIB recommended font is Arial 12pt).
8. Support Macros and Shortcuts to personalise and to increase productivity.
9. Be consistent - certainly within an application and throughout if possible.
10. Enable simple logical and complete navigation within and between related systems.

These rules are recommended for all new non-web applications developments in HMRC. Under new HMRC Accessibility Standard rules it is proposed that they are made a mandatory requirement.

Note:

A body of standards for external website accessibility had been developed by On-line Services. They include an Accessibility Strategy, accessibility standards and a component kit for use by developers when designing new on-line services. Additional standards are adopted for web based systems (W3C Standards) and Business Developed Applications. A review is currently being conducted to document and align Departmental Standards (wherever possible) and to include evaluation against these standards in all future IT developments.

Appendix 2

Consultation with HMRC Diversity Network Co-ordinators

Disability	Internal / External Users: Disability forms the main thrust of the Departments response to this Equality Assessment. Full details of responses in respect of both Staff (Internal) and Customers (External) is contained in the body of this report.
Of different racial groups	Internal Users: The race network co-ordinator indicated that they could find no impact on their group within the scope of IT Accessibility. External Users: Impact of policy to use IT as preferred method of communication with external customers will have been assessed elsewhere (Govt policy). No obvious issues have been identified in the systems themselves which would impact negatively on this group.
Of Different Gender	Internal / External Users: No issues around IT Accessibility were identified by the Gender Network Co-ordinator.
Of Different Age	Internal / External Users: It was pointed out that disability tends to increase with age, especially in respect of mobility and dexterity issues. Mitigating actions: The needs of older users of both internal and external systems will be taken into account when designing them.
Of Different Marital Status	Internal / External Users: No specific issues were identified with this group in respect of IT Accessibility.
With or without Dependents	Internal / External Users: No specific issues were identified with this group in respect of IT Accessibility.
Of different sexual orientation	Internal / External Users: No specific issues were identified with this group in respect of IT Accessibility. A number of policy related issues were raised in relation to content of IT systems in respect of Gender identity and its confidentiality. As these do not impact on the scope of this review, they have been passed to our HR team for further investigation.
Of Different Religious Belief	Internal / External Users: Consultation with Staff Network Co-ordinator for Religion and Belief and central HR Diversity Team indicates no specific issues relating to IT Accessibility.
Of different Political Opinion (NI only)	Internal / External Users: No impact on this group.

Who use different languages	Internal / External Users: Impact of policy to use IT as preferred method of communication with external customers will have been assessed elsewhere (Govt policy). No obvious issues have been identified in the systems themselves which would impact negatively on this group.
------------------------------------	--

Glossary

Key Terms

Term	Meaning
Diversity and Equality	<p>Diversity and Equality is a HMRC policy designed to ensure that:</p> <ul style="list-style-type: none"> ➤ Our services will be accessible and sensitive to different customer needs; ➤ Our compliance activities and our work at ports and airports will take account of the needs and expectations of small and large businesses and of the individuals with whom we come into contact; ➤ Our workforce will reflect the diversity of the communities we serve. <p>Our Goal is to become a flagship organisation, leading by example and demonstrating, in measurable ways, that diversity is an integral part of our working life. Specifically, our policy is to:</p> <ul style="list-style-type: none"> ➤ Recognise that barriers may still exist in society and in the workplace that would hinder the progress of particular groups and to act positively to ensure that these are eliminated from all HMRC policies and processes. ➤ Use the knowledge and skills of our diverse workforce to increase compliance and customer satisfaction and better understand the customers' needs and viewpoint. ➤ Employ a diverse workforce that represents the community we serve, helping us to develop our policies and practices in ways that are appropriate to different customer groups. ➤ Value our people as individuals who have a unique contribution to make to HMRC's success. Use our differences in positive ways to promote an inclusive environment for our employees and customers. ➤ Be the public sector's employer of choice, attracting and retaining the best from the widest pool of talent and developing our people to the level of their potential and inclination. ➤ Eliminate any unjustifiable discrimination against anyone for any reason, including race, ethnic origin, religion, nationality, sex, sexual orientation, working pattern, marital status, gender reassignment, disability or age. In Northern Ireland, to eliminate any unfair discrimination because of political opinion. ➤ Monitor and evaluate our progress to ensure we are meeting our targets and legal responsibilities. <p>HMRC operates a number of 'Equality Schemes', including those for Race, Disability and Gender.</p>

Key Terms (cont)

Term	Meaning
Disability	HMRC follows the guidance provided by the Disability Rights Commission as to who is covered by the Disability Discrimination Act. The DDA states that “A person has a disability if he or she has a physical or mental impairment, which has a substantial and long-term adverse effect on his or her ability to carry out normal; day-to-day activities”.
Accessibility	‘IT Accessibility’ is the discipline of designing and building computer systems and products in such a way that they can be used by any user irrespective of age, disability, gender etc. It therefore relates to all aspects of equality and in particular disability. Individuals with certain disabilities may need specialist software tools (Dragon, JAWS etc) to help them access (i.e. use) systems.
Usability	‘Usability’ is a related issue - the design of a system or product will influence how easy it is for individuals to use i.e. a system may be accessible in theory but so difficult to use that it is not accessible in practice.
Particular Needs (PN)	In this document, the term ‘Particular Needs users’ refers to our disabled staff, in particular those to whom we provide software tools (Dragon, JAWS etc) to help them access our Corporate systems and other products used in HMRC (e.g. Word, Excel).

Other Terms

Term	Meaning
ASPIRE	IMS' strategic partner, a consortium of companies that provides outsourced IS services to HMRC including systems development
CaM	Communications and Marketing, a division of HMRC that among other responsibilities sets standards for the HMRC's Intranet
DDA	Disability Discrimination Act
DES SG	HMRC's Disability Equality Scheme's Steering Group
DTUS	Departmental Trade Union Side
EFD	Employers' Forum on Disability
EQIA	Equality Impact assessment
HMRC	HM Revenue and Customs
IMS	Information Management Solutions, a division of HMRC that acts as the prime supplier of IS services to HMRC
ISO	International Standards Organisation
Provisioning	An HMRC internal process for providing staff with adaptive and assistive tools (e.g. ergonomic mice, Dragon software) as required
Golden Rules	HMRC internal IT Accessibility standards, based on ISO standards, covering the design of non-web applications
W3C	The World Wide Web Consortium – W3C's IT Accessibility standards for the design of web applications are mandated for use by Government Department's including HMRC
IS	Information Systems
Transition Gates	Transition Gates are checkpoints at different stages of a projects lifecycle which ensure that it is ready to progress to the next stage. At each gate the Accessibility issue must be considered and actions taken, avoiding the discovery of errors or non compliance with accessibility standards at the end of a project.
W3C / WCAG "A", "AA" "AAA" standards	Web Content Accessibility Guidelines 1999 (WCAG), defined by the Web Accessibility Initiative (WAI), a committee of the World Wide Web Consortium (W3C) which is responsible for the definition and promotion of web accessibility standards. The WCAG are generally recognised to be the official 'baseline' for accessibility standards and are referenced by most international laws on accessibility. The WCAG is comprised of checkpoints assigned priorities 1

	<p>(mandatory), 2 (should do) and 3 (recommended).</p> <p>Additionally, conformance levels are prioritised as follows:</p> <ul style="list-style-type: none">• Conformance Level "A": all Priority 1 checkpoints are satisfied;• Conformance Level "Double-A": all Priority 1 and 2 checkpoints are satisfied; <p>Conformance Level "Triple-A": all Priority 1, 2, and 3 checkpoints are satisfied</p>
--	---