

A Response to the Digital Inclusion Action Plan

9th April 2025

Executive Summary

In response to the call for evidence on the [Digital Inclusion Action Plan](#) by the Department for Science, Innovation and Technology, we make the following recommendations.

Our policy recommendations:

- Scale-up professional digital accessibility skills and capacity building in the workforce to support digital inclusion.
 - Embed accessibility education in secondary, further and higher education to ensure that the UK digital workforce is equipped to design and deliver usable, inclusive and accessible digital technologies.
 - Partner with learned societies and degree accreditation organisations to embed accessibility in digital qualifications.
 - Engage with the Teach Access UK + Europe Initiative.
- Ensure digital literacy programmes include basic digital accessibility curriculum, building confidence through the recognition that accessibility is a shared endeavour
- Resource Government Digital Service (GDS) and Equality and Human Rights Commission (EHRC) capacity to support, monitor and enforce current Public Regulations for digital accessibility.
- Set expectations for private sector responsibilities for digital inclusion and accessibility.
 - Capitalise on the European Accessibility Act (2025).
- Promote digital accessibility within, and for, the professions.
- Use horizon scanning to ensure technological developments are harnessed for increased accessibility for groups whose needs are not prioritised in current accessibility standards.
- Embed Digital Inclusion Action Plan objectives across the 3 levels of the Disability Confident Scheme.

The response provides evidence and policy recommendations in relation to the following questions: Q6, Q7, Q8, Q10, Q11. Q12, Q13.

Response Authors

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[Dr Ben Whitburn](#): Associate Professor, Centre for Research in Inclusion, Southampton Education School, University of Southampton. Dr Whitburn is a blind academic who relies on digital and physical accessibility provisions to carry out his research, teaching, supervision, and leadership. He is the academic co-chair of the institutional Disability Equality Steering Group and the School's Equality, Diversity and Inclusion (EDI) Champion. His research has highlighted the significance of digital accessibility to school inclusion for disabled young people (Whitburn, 2014).

About the Teaching Accessibility Research Group

Based at the [Centre for Research in Inclusion](#) at the University of Southampton, the group is centred around [Teaching Accessibility in the Digital Skill Set](#), a major UK Research & Innovation (UKRI) investment (£1.3 million) that is leading internationally-recognised research into the teaching and learning of digital accessibility within higher education and the digital professions. The programme focuses on embedding digital accessibility into technical disciplines and the wider digital workforce, with the goal of fostering a digitally inclusive society that meets the needs of disabled and older people. Disabled people and older people remain among the most digitally excluded groups in society. As everyday life is dependent on digital platforms, the imperative for accessible digital tools and environments is greater than ever. Yet the sector lacks a detailed understanding of how digital accessibility is most effectively taught, learned, and scaled across educational and professional contexts. This research programme is generating a significant body of research-led pedagogic content knowledge (PCK) in digital accessibility, strengthening digital skills within both academia and industry. Through collaborative engagement between researchers, educators, industry professionals and disabled people, the project supports the development of a sustainable pedagogical culture within communities and networks of practice, including the annual Southampton International Symposium on Teaching Accessibility. It draws on innovative research methods to support inclusive teaching and learning practices and embed accessibility as a core digital competency. A new phase of the project (2025–2028) now works to deepen understanding of accessibility PCK, shifting focus from pedagogical design to learner journeys, and exploring the opportunities and challenges presented by emerging technologies such as Artificial Intelligence. This ongoing research seeks to elevate accessibility education and research as national and international priorities and support public policy for a more inclusive digital future.

Response to Questions

Across the Digital Inclusion Action Plan, there is a strong focus on developing the skills, access and infrastructure capacities for groups that are currently digitally marginalised across the UK. Current statistics show that more people than ever are accessing digital services, however, for disabled and older people, and others who use adaptive settings, or require reasonable adjustments, there is currently no guarantee that tools and services will work, once online. **For digital inclusion to be achieved, it is necessary for all tools, systems and services to be designed with inclusion in mind. In short, digital accessibility is the foundation for all digital inclusion and is the cornerstone of digital disability rights.**

Q6: Are there examples of digital inclusion initiatives that could be scaled-up or replicated in other local communities? Please provide the name of the initiative (if known), the organisation (if known), a summary of what they do and contact details (if relevant).

- **Scale-up professional accessibility skills and capacity building to support digital inclusion. The *Teach Access UK + Europe* Initiative.**

Digital inclusion is reliant on usable and accessible platforms, tools and services. To build these tools organisations need a workforce with accessibility expertise, across a range of roles (from hardware and software engineering, product management, design, project management, developer, through to content authoring). However, despite a trajectory of growing demand, there is a lack of accessibility capacity across the digital workforce. There is a need to scale-up professional accessibility skills and capacity building to support digital inclusion.

To address this, in the USA, [Teach Access](#) was established in 2016 as a non-profit collaboration between the tech industry, universities and higher education institutions and disabled people's advocacy groups and organisations. Teach Access provide free programmes and resources for students and educators including a curriculum repository, online courses, annual grants to educators, and a fellowship programme. By 2024, they have awarded funds exceeding \$350,000 and engaged over 230 educational institutions and 500,000 students (Teach Access, 2024). Through their grants programme they have established a high-quality repository of open educational resources for teachers across a range of disciplines and contexts, their [Accessibility Skills Hiring Toolkit](#) supports employers looking to recruit for accessibility skills.

In the UK, the University of Southampton have established a steering group with Teach Access and the European Disability Forum, alongside academics, industry and disabled people's organisations to develop a similar initiative across the **UK and Europe**. This non-profit model seeks to address the accessibility technology skills gap across the UK and Europe by working to build teaching accessibility capacity and quality in higher education. UK Government support for this work could fast-track this emergent initiative.

Q7: Are there examples of evaluation models for measuring the impact of digital inclusions programs that you are aware of? Please provide details of these models and where they have been used (if known)

- **Government should resource GDS and EHRC capacity to support, monitor and enforce current Public Regulations for digital accessibility.**

Digital accessibility in the public sector conforms to [Web Content Accessibility Guidelines AA](#) and is underwritten by both Public Sector Bodies Accessibility Regulations, 2018, and the Public Sector Duty. As our public sector accessibility legislation was enacted prior to the UK's departure from the EU, this is part of our statute. This is currently monitored by Government Digital Service (GDS), however, enforcement is under resourced. Enforcement has been tasked to the Equalities and Human Rights Commission, and to date, enforcement activities are ongoing (68 resolutions, 30 still ongoing; GDS, 2024). A concern remains that the majority of people who are excluded on the basis of disability are unaware of formal complaints procedures and how these can be escalated effectively. For compliance to be effective, GDS can (and does) model good practice, the EHRC requires additional resource to ensure that an increase in complaints can be acted upon. In Europe, equivalent actions include centralised European oversight, which the UK lacks (Lewthwaite & James, 2020). Adding accountability at this level will embed good practice.

Q8: In what ways could the government partner with industry, charities and community organisations to promote digital inclusion?

- **Government should partner with learned societies and degree accreditation organisations to embed accessibility in qualifications for digital professions.**

Government should partner with learned societies and degree accreditation organisations in digital disciplines (for example, for computer science, the [BCS, the Chartered Institute for IT](#)) to ensure that digital accessibility is embedded within digitally-focussed degree programmes (such as software engineering, human-computer interaction, robotics, AI). This is necessary to ensure that the graduate workforce has a working knowledge of digital accessibility and inclusion, and can build, maintain, develop and evaluate systems, services, platforms and tools with accessibility standards and disability in mind. With the enactment of the European Accessibility Act (2025) to be enforced across Europe, the UK needs a skilled graduate workforce with accessibility capacities, to ensure that our digital products meet the needs of our home markets, and can also be sold to Europe as a leading trade partner.

Q10 c./11 c. Focus area and objectives relating to: Breaking down barriers to digital services:

There are several significant omissions from the Action Plan necessary to digital inclusion. These relate to:

- Accessibility education
- Workforce development
- Private sector responsibilities for digital inclusion and accessibility
- Legal factors, monitoring and enforcement

- Disability confidence
- **Set expectations for private sector responsibilities for digital inclusion and accessibility.**
- **Capitalise on the European Accessibility Act (2025).**

The Action Plan focusses on the accessibility of public services, this is essential but not sufficient for digital inclusion. In Europe, from June 2025 the European Accessibility Act (2025) will begin the monitoring and enforcement of accessibility standards for the private sector across the EU member states. The UK Government **should** spur accessibility across the private sector to align with Europe, developing a roadmap to support digital inclusion at home and with our trading partners, within a framework of monitoring and enforcement. Leading practices are already being demonstrated, for example, within the banking sector, where accessibility practices have developed greatly over the past 10 years.

- **Promote digital accessibility within, and for, the professions.**

The Action Plan currently positions digital inclusion and accessibility at a service-user/external level. This undervalues the importance of accessibility for platforms, tools and environments within the workplace. Attention to the accessibility of Government and public service digital platforms should also recognise internally-facing systems meet accessibility standards, for workforce inclusion. Accessibility standards such as [User Agent Accessibility Guidelines \(UAAG\)](#) and [Authoring Tool Accessibility Guidelines \(ATAG\)](#) are relevant here.

- **Embed digital inclusion into the Disability Confident Employer framework.**

The Industry Pledge proposes organisations explicitly and publicly acknowledge their efforts to become more digitally inclusive by applying for Disability Confident Employer status, which is the second of 3 stages of disability employment from the Department of Workplace and Pensions (2025). While this programme provides valuable practical strategies and acknowledges the importance of reasonable adjustments and assistive technology, it largely reflects a deficit model of disability. This framing sees disability as a problem located within the individual, where digital accessibility is treated as a compensatory measure—something to be added when a person discloses a need, rather than a fundamental principle of inclusive design. Rather than embedding accessibility into the fabric of organisational practices, disability is treated as an exception to be managed discreetly. These risk creating environments where accessibility is conditional—available only to those who identify and advocate—rather than guaranteed as a right for all. This gap reveals a deeper issue around the conceptualisation and development of disability confidence among organisations, which the DWP will need to address across the Disability Confidence programme in line with the Digital Inclusion Plan. As a minimum, the 2nd and 3rd levels of the Disability Confidence programme should include explicit undertakings of digital maturity assessments, pointing to those supplied currently by AbilityNet.

Q12c. Medium and long-term next steps: Breaking down barriers to digital services:

➤ **Establish targeted support for people using relevant public services**

While it is well established that digital services create exclusionary barriers for identified groups (e.g. Q5), it is not well understood how intersectional disadvantages can further exacerbate these issues. Explicit collaboration with researchers will be necessary, particularly those with expertise for running impactful, participatory-based projects in partnership with communities to identify key issues. Importantly, user experience will need to be targeted explicitly, particularly for those populations whose experiences are not well understood and who are most at risk of digital marginalisation. This also expands to using multiple devices for accessing digital services, such as computers, screen readers, and phones, which can present different experiences of accessibility for particular users.

Q13. Additional recommendations:

➤ **Address hierarchies of exclusion with horizon scanning to ensure near-term innovations are harnessed to exceed current accessibility standards**

The cost and scale of accessibility actions can change dramatically dependent on innovation in the public and private sector. For example, the BBC's leadership on subtitling and streaming (iPlayer), has led and set industry norms. As a result, video captions now offered by TV and video platforms, and auto-captioning for video conferencing has become a point of competition for platforms such as Zoom and MS Teams.

We consider that government should undertake horizon scanning in this field, paying particular attention to those disabled communities who are often neglected within mainstream accessibility discourse (Lewthwaite & James, 2023), and whose requirements are not met by current digital accessibility standards for the public sector and related fields (WCAG 2.2: AA).

For example, we anticipate the potential for the following innovations to impact mainstream digital experience within the next 12 months.

- The use of Generative AI/Large Language Models to support the co-production of 'Easy Read' texts and multimodal forms of accessible communication for people with intellectual disabilities.
- British Sign Language translation becoming more widely available (for example, through services such as [Signly](#)) and automated via digital avatars.

Such advances suggest that higher accessibility thresholds ([WCAG AAA](#)) could be met as standard for groups whose requirements have not been prioritised by mainstream accessibility practices to date (Lewthwaite & James, 2023). In the UK, the status of British Sign Language as a linguistic minority online bears particular attention, due to the dominance of American Sign Language. Such activities could be more effectively backed by either research funding, or through the Digital Inclusion Innovation Fund (Department for Science, Innovation, and Technology, 2025).

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DOI: <https://doi.org/10.5258/SOTON/PP0109>