Accessible Information and Communications Policy



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1. Policy Aims and Scope

The aim of this policy is to have a clear, consistent, transparent and fair approach to the way we communicate and provide information. It reflects best practice in inclusion and accessibility for all and particularly for:

- Disabled people
- People who do not speak or read English at all or very well
- People with low literacy
- People in digital poverty or who don't have access to IT

It covers:

- Internal and external communication
- Written, visual, audio, digital and face to face communication, including social media
- Documents / information (both physical and digital)
- Proactive and re-active communications
- Corporate correspondence
- Meetings
- Online forms and services
- Provision of Interpretation, translation, transcription and communication support
- Planning and design of information and communication channels and materials
- Customer engagement mechanisms

2. Policy Context

This policy supports Reading Borough Council's Customer Experience Strategy 2020-2024 which sets out the Council's commitment to customer service excellence - that every interaction will be a positive experience: better, faster, simpler; and recognises that some people might need extra support to access services, and that we must ensure it is available. It pledges to look at our services and processes through the lens of the customer to ensure services are accessible.

3. Legal framework

This policy also enables us to meet legal requirements in relation to accessible information and communication. These come mainly from 3 areas: The Equality

Act; Web Content Accessibility Guidelines (WCAG) and the NHS Accessible Information Standard

3.1 Equality Act 2010

All the Council's services are required to meet the Equality Act 2010 requirement not to discriminate, and to advance equality of opportunity for protected characteristics: age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; sexual orientation. This may mean:

- removing or minimising disadvantages if it is connected to that characteristic;
- taking steps to meet the needs of people who share a relevant protected characteristic that are different from the needs of people who do not share it;
- encouraging people who share a relevant protected characteristic to participate in public life or in any other activity where their participation disproportionately low.

The Equality Duty explicitly recognises that disabled people's needs may be different from those of people who are not disabled and there is a requirement to make reasonable adjustments.

3.2 Web Content Accessibility Guidelines (WCAG)

The Web Content Accessibility Guidelines (WCAG) are the international standard for producing a universal approach to web content accessibility for the needs of individuals, organisations and governments.

All public sector organisations' websites and mobile applications must meet the international WCAG 2.1 Level AA standard alongside publishing an accessibility statement outlining the extent to which the website is accessible.

The Web Content Accessibility Guidelines aim to ensure that all elements of the digital service are made more 'perceivable, operable, understandable and robust'

3.3 NHS Accessible Information Standard

Under the Care Act (NHS Accessible Information Standard), NHS and Adult Social Care services have a legal responsibility to provide clear access to information. This standard sets out a legal specification that guarantees that information and communications preferences are identified, recorded, flagged, and shared and met for 'patients, service users, carers and parents with a disability, impairment or sensory loss' (NHS, 2020). This standard does not apply to generic services or websites that adult social care users may use.

4. What do we mean by Accessible Information and Communication?

Accessible Information and Communication means using clear, easy to read language and simple, uncluttered design in all communications, and providing appropriate accessible formats and methods so that our communication includes everyone.

We are living in an increasingly digital age which has many benefits for access and inclusion e.g.:

- accessibility features on web sites can read out information to people with visual impairments
- translation apps enable people to translate information into their first language instantly

But we know that many people face obstacles accessing online services e.g.:

- not having the equipment or access to the equipment, to go online.
- not having the skills or ability to use the technology
- not having access to the internet
- anxiety/fear/lack of confidence in using the technology
- accessibility for disabled people
- language and literacy
- not having the assistance and support to go online
- preferring face to face to discuss complex issues.

This means we need to consider how disabled people, people who do not speak or read English at all or very well, people with low literacy and people in digital poverty or who don't have access to IT will be able to receive and understand our information and communicate with us.

5. Customer Needs Assessment

We have carried out a Customer Needs Assessment (Appendix A). We know from our residents' survey¹ that three quarters of residents prefer to receive information about council services via email and just over a half prefer to use the Council's website.

This means a quarter to half of residents prefer to receive information in other ways. Information from voluntary sector services and service users indicate that a variety of methods are needed to cater for different needs: face to face, phone; accessible formats, interpretation and translation and non-digital options.

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¹ RBC Residents Survey 2018

In Adult Social Care the largest single needs are for large print and British Sign Language interpretation. It is estimated that 2,205 adults in Reading have severe hearing loss². Our translation and interpretation service had 330 requests for BSL during 2019/20.

Whilst Reading is a very diverse town and has twice the national average of households where no one in the household has English as their main language, just 2% of the Reading population (3,140 people) report that they cannot speak English at all or not well (Census 2011). This is in line with the national average. The main languages of the households with the highest numbers where English is not spoken at all or not well are Polish, Punjabi, Urdu, Nepalese, Bengali and Portuguese. This, along with Arabic and Romanian is reflected in Council's Interpretation and Translation service records.

Being able to find key information easily on the Council's website and to see themselves represented positively in Council communications is also important - for people to trust that the Council has their interests at heart and to feel encouraged to engage with Council messages.

² We used POPPI for prevalence estimates, which are modelled based on estimates in 'Hearing in Adults' (1995) Edited by Adrian Davis.

6. Our Principles and Standards for Accessible Information and

Communications

As a result of our needs assessment and gap analysis (Appendix B) we will adopt the following principles and standards:

1) Full compliance with WCAG 2.1 Level AA standard for web accessibility We will pursue full compliance with the WCAG 2.1 Level AA standard for web accessibility and communicate inclusion and accessibility principles and methodology widely across the staff base. This will improve understanding and use of the best practice tools available for accessibility of both online and offline information. This will apply to our own and outsourced communications, third-party communications provided via the Council, to the use of third-party communication vehicles e.g. websites and portals.

2) Work towards full compliance with the NHS Accessible Information Standard across all services

We will adopt the NHS Accessible Information Standard across all services for customers with disability, impairment or sensory loss. The roll-out of this will be built into our Customer Experience programme.

3) Positive Images

We will present positive images of disabled people and ethnic diversity on our website and publications to encourage customers to use our services, to help them identify with the message and feel that they can trust the organisation. We will increase our photo library of real residents and service users so that images are more authentic and better represent local context.

4) Involve target audiences to understand what is effective for them
As part of inclusive communication, we will ask what our customers need to
understand the messages that we want to give them and ensure they can let
us know how they want to communicate with us.

5) Designated web page for disabled people

To make it easier for disabled people to access information that is most important to them we will have a designated page, signposted from the Website Home page, with clear information about the services which are the highest priority for them such as accessible toilets, Blue Badges and parking.

6) Telephone hotline to support all areas of the website

We will provide a Telephone hotline to support all areas of the website where people need assistance to find what they are looking for, complete a transaction, or report a problem with accessibility. This will be promoted on the accessibility pages and staff taking the phone calls will receive additional training to enable them to deal effectively with the customer enquiry.

7) Design accessibility into information and communication

We will use clear, easy to read language and simple design. We will use Trebuchet or similar (sans serif) font and a minimum font size of 12 point for paper copy.

8) Meet accessible communications needs on request.

We will make provision to be able to meet customers' communications needs on request. In line with our Customer Experience Strategy, customers will be able to receive support by telephone or face to face if they have additional needs and need to speak to an advisor or specialist. We will provide alternative channels for those who need additional support (e.g. face to face appointments). We will make provision for interpretation and translation, alternative formats and multiple channels on request and within a standard timescale.

9) Ensure the additional needs of customers are considered when designing communications

Where there is evidence of need and demand we will provide translated material and accessible formats in advance. We will develop a standard set of principles and criteria for when to make this provision.

10) Interpretation and translation service

We will provide an Interpretation and Translation service. We will provide clear information to customers about how they can ask for interpretation or translation and clear information for staff on standards and how to request a service on behalf of a customer.

11) Staff informed and trained on accessible information and communication

We will provide training and resources for staff on communicating in an inclusive and accessible way. This will be based on the Accessible Information Standard and WCAG 2.1. We will have an accessible information and communication section on our Intranet where staff can access

- Training
- Accessibility guidelines and resources
- Accessible Information Standard and WCAG 2.1
- Interpretation and translation service
- Data and evidence of need and demand for accessible formats and interpretation and translation.

7. Principles into Practice

We have prepared a road map (Appendix C) for putting these principles into practice.

8. References

Customer Experience Strategy - 2020-2024 <u>Customer care - Reading Borough Council</u>

Equality Act 2010 Equality Act 2010: guidance - GOV.UK

Web Content Accessibility Guidelines (WCAG) <u>Understanding accessibility</u> requirements for public sector bodies - GOV.UK

NHS Accessible Information Standard

Customer Needs Analysis

1. General

We know from our residents' survey³ that three quarters of residents prefer to receive information about council services via email and just over a half prefer to use the Council's website. This reflects is broadly reflected across ethnicity.

In which of the following ways would you most prefer to receive information						
about council service	s?					
	Black,					
	Asian And Minority Ethnic	Black, Asian And Minority Ethnic		White	White	
					Perce	
Option	Total	Percent		Total	nt	
Via the Council website	40	54.79%	2	310	55.66%	2
Via email	57	78.08%	1	404	72.53%	1
Via smartphone	37	70.00/0	4	707	12.33/0	'
applications	11	15.07%	'	49	8.80%	6
Via SMS text message	9	12.33%	5	48	8.62%	7
Via Twitter	1	1.37%	8	17	3.05%	9
Via Facebook	8	10.96%	6	65	11.67%	5
Via your local Councillor (including			3			
Councillor surgeries)	13	17.81%		131	23.52%	3
Campaigns, workshop			3			
sessions and forums	13	17.81%		76	13.64%	4
None of these	0	0.00%	9	4	0.72%	10
Other (please write			7			
in box below)	6	8.22%		45	8.08%	8
Not Answered	0	0.00%	9	4	0.72%	10

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³ RBC Residents Survey 2018

2. Disability

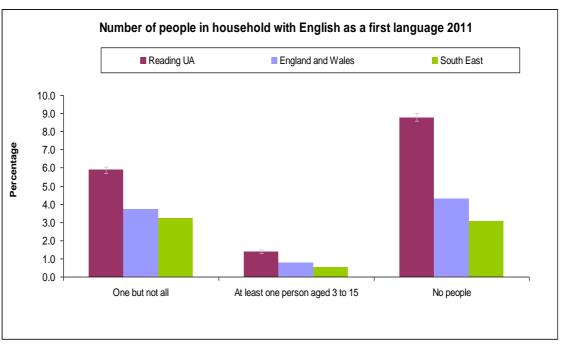
Regarding more specific needs, Adult Social Care record 79 clients in receipt of personal care who have specific communication needs. The largest single needs are for large print and British Sign Language interpretation.

Accessible Information Category	No of People
Communication support	30
Does use hearing aid	13
Requires third party to read out written	
information	1
Requires visual alert	1
Uses a citizen advocate	3
Uses alternative communication skill	5
Uses communication device	2
Uses personal communication passport	2
Uses sign language	1
Using Makaton sign language	2
Requires communication professional	11
Interpreter needed - British Sign Language	11
Requires specific contact method	4
Requires contact by email	1
Requires contact by letter	1
Requires contact by telephone	2
Requires specific information format	34
Requires information in Easy read	3
Requires information in Makaton	2
Requires information verbally	2
Requires written information in at least 20-point	
sans serif font	12
Requires written information in at least 24-point	
sans serif font	15
Grand Total	79

Source: Mosaic (Adult Social Care recording system)

3. Language

The Census 2011 records that around 84% of households in Reading have all members of that household with English as their first language. This is a lower proportion than the national and South East Region averages.



Source: ONS Census 2011

8.8% of households in Reading have no people in the household where English is a main language. This compares with 4.4% nationally.

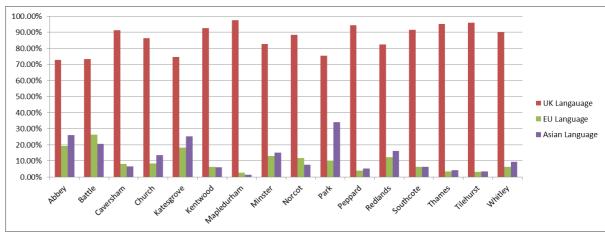
3.1 Languages spoken across Reading

The table below highlights the main languages spoken across Reading.

Main Language	Reading
	Count
English	126,690
Polish	3,768
Nepalese	2,430
Urdu	1,790
Punjabi	921
Portuguese	655
French	633
Arabic	600

Source: 2011 Census ONS

There are geographical differences as can be seen by the graph below.



Source: 2011 Census ONS

Annual Mother tongue records of Reading pupils show that diversity of pupils' main language is considerably greater than the whole population.

Mother	Primary pupils	Secondary pupils
tongue		
English	62.9%	67.7%
Urdu	4.4%	3.3%
Polish	3.6%	3.2%
Nepali	2.3%	2.1%
Hindi	1.6%	1.7%
Punjabi	1.5%	1.8%
Tamil	1.5%	1.3%
Arabic	1.4%	1.3%

Source: 2020 School Census, Reading Borough Council

3.2 Need for Interpretation and Translation

The main languages of the highest number of households in Reading where English is not spoken at all or not well are Polish, Punjabi, Urdu, Nepalese, Bengali and Portuguese

Main language	Main language is not English (English or Welsh in Wales): Cannot speak English or cannot speak English well (Census 2011)
Pashto	785
Romanian	823
Latvian	1,066
Persian/Farsi	1,101
Turkish	1,124
Gujarati	1,134

British Sign Language	1,147
Spanish	1,184
Italian	1,250
Hungarian	1,280
Tamil	1,294
Russian	1,688
Arabic	1,755
Cantonese Chinese	1,875
Lithuanian	2,032
Slovak	2,198
Portuguese	2,676
Bengali (with Sylheti and Chatgaya)	3,377
Nepalese	3,454
Urdu	4,292
Punjabi	7,799
Polish	18,349

The Council's Interpretation and Translation service recorded requests for 71 translations and 2530 interpretations during the period April-March 2019/20. The languages in highest demand for translation were Urdu, Nepalese, Polish, Arabic and Romanian; and the languages in highest demand for interpretation were Nepalese, British Sign Language, Polish, Romanian and Arabic. The tables below demonstrate the diversity of languages requested.

No. of Translation request	by each Language
Italian	1
Farsi	1
German	1
English	1
Turkish	1
French	1
Hindi	1
Bengali	2
Albanian	3
Braille	3
Tamil	3
Hungarian	3
Spanish	4
Portuguese	4
Punjabi	5
Romanian	6
Arabic	6
Polish	8

Nepalese	8
Urdu	9
	71

No. of Interpretation request by	each language
Macedonian	
Gujarati	
Tetum	
Uzbek	,
Mirpuri	
Telugu	
Indonesian	
Serbian	
Latvian	
Persian	
Korean	
Japanese	
Lithuanian	
French	
Kurdish Sorani	
Czech	
Russian	
Slovakian	
Twi	
Swahili	
Farsi	
Thai	
Turkish	1
Pashto	1
Hindi	1
Greek	1
Hungarian	1
Somali	1
Albanian	2
Dari	2
Punjabi	2
Vietnamese	2
Bulgarian	2
Cantonese	3
Italian	3
Tamil	3
Mandarin	4
Bengali	5
Spanish	5

Sylheti	64
Portuguese	72
Urdu	97
Arabic	132
Romanian	295
Polish	319
British Sign Language	330
Nepalese	672
	2530

It is estimated that 2,205 adults in Reading have severe hearing loss⁴. Our translation and interpretation service had 330 requests for BSL during 2019/20. The BSL Covid video on the Council's website had the following no of hits:

Month	pageviews	unique pageviews
May	357	312
June	178	153
July	68	60
August	51	43
September	46	38
October	28	20

Adult Social Care records show 11 clients requiring a BSL interpreter but no requests for information in BSL.

3.4 Feedback from Access and Disabilities Working Group

The Council's Access and Disabilities Working Group campaigns for improved access for disabled people and acts as a pressure group in identifying and promoting public awareness of problems of access - primarily the physical barriers and exclusions imposed on people by poor design of buildings and places within the Borough. It also monitors and reviews the role of the Council as an employer and as a provider of services. It has given feedback to the Council, over the years on accessible information and communication. Its most recent feedback is:

• Council's website

➤ Home page should have a designated page for disabled people; the key content being clear information about accessible toilets and Blue Badges and parking

- > Be accessible for screen readers
- > Present positive images of disabled people

In response, the new website will include positive images of disabled people. There will be a designated page for disabled people providing easy

⁴ We used POPPI for prevalence estimates, which are modelled based on estimates in 'Hearing in Adults' (1995) Edited by Adrian Davis.

access to information such a toilets and parking, including a map of parking bay locations.

Polling Stations

- > Ballot paper available in large print
- Offer appropriate magnification magnifier
- > Offer a template

3.5 Feedback from Voluntary Sector Partners

We asked our voluntary sector partners for feedback on the needs their service users presented to them and what their experience was of the best methods for communicating with their service users.⁵

We received feedback from 32 voluntary sector partners serving a range of target service users, but the largest group was disabled people.

The feedback was clear that a variety of methods were needed to cater for different needs. A number commented that face to face communication was preferred and the phone was often the best alternative option for people; and that those with only a mobile could receive a text or WhatsApp.

'A mixture:

Telephone (primary source of introduction - often to the family member/carer)

Video calling after introduction and according to individual circumstance (What's App, Teams, Zoom, Skype)

Email as appropriate

Old fashioned postal mail (people do like detailed information in hard copy format to enable ongoing read throughs- this applies even to those who use email. It should be noted that when people indicate they have an email address we do check that they use it - often they don't monitor it) Group meetings - these have been set up during the pandemic and have been appreciated by several service users- we tend to use Zoom'

'We have to be flexible. We need to meet with some; we need to phone some; we need to send text in different fonts to some; we need to send text highlighted colours for some; we need to send messages in short sentences to some. Some people need reminders. And so on.'

'A phone call is a good way but overall, we find that face to face is by far the best way to communicate and more important confirmation of their understanding.

Some people can say yes (to please) but do not fully understand what has been written. Support to explain the information and consequences of their decisions if they make any.

⁵ Information from the Voluntary and Community Sector on Digital inclusion and Communication preferences of service users, Policy Team, Reading Borough Council, December 2020

Easy read documents are a good start- but again these need to be discussed so that systems/guidelines/information can be put into perspective and use examples of situations that people can learn from.'

'We usually phone our learners as this is the best method and we have set up smaller whats app class groups. Many learners don't have email accounts, so cannot respond to emails. We have a facebook page but not everyone connects to this. We send messages to them over mobile phones or their telephone (landline)'

'Whatsapp tends to be the best, as well as text message or phone call ... Zoom and other conferencing methods tend to be more difficult.'

The main specific needs reported were provisions of accessible formats to meet the diverse needs of disabled people, provision of interpretation and translation and non-digital options for communication.

'Very easy words - avoid jargon and big sentences Big print - not enormous just over 14- 16 font size Showing and explaining Easy Read documents with pictures or symbols'

'basic plain English and no jargon'

It was also pointed out the use of different platforms for video meetings was difficult for service users.

'Ease of use, consistency, e.g. some organisations use Zoom, others use Teams, others use Skype, others use Google Meet; organisations use different social media platforms - website, Facebook, Instagram, Twitter. If an individual has contact with multiple organisations, they may need to use a range of platforms.'

Gap Analysis and Recommended Action

Recommended Best Practise	Current RBC Practice	Action Required
1. Full compliance with WCAG 2.1 Level AA standard for web accessibility We should pursue full compliance with Level AA and communicate the inclusion and accessibility principles and methodology widely across the staff base to improve understanding and use of the best practice tools available which will improve the accessibility of both online and offline information. This should apply both to our own and outsourced communications, third-party communications provided via the Council, and to the use of third-party communication vehicles e.g. websites and portals.	conforms partially with baseline Level AA tier of the WCAG 2.1. Areas of the website which lack AAA status include outdated PDF documents that do not meet accessibility standards, noncompliant downloadable documents, videos without BSL interpretation, captions or transcripts, and tables that have not been provided with titles, column or row headings. Awareness of what is required is low. Use of third-party websites and portals is common as is distribution of third-party communications. These are not necessarily compliaint with WCAG 2.1 Level AA	information and communication Intranet page to improve understanding and assist compliance. Incorporate into training package. Develop a comprehensive template for accessible on-line and off-line communications, both internal and external. Use of third-party websites and portals to be subject to approval by the Web Team for compliance with WCAG 2.1 Level AA Distribution of third-party communications to be subject to approval by the Communications Team for compliance with the accessibility template.
2. Work towards full compliance with the NHS Accessible Information Standard across all services	indicates that identification and recording may not be comprehensively undertaken.	Audit and review compliance with standard in Adult Social Care and implement any improvements required. Use lessons learned to support other services to comply with the standard

The NHS Accessible Information Standard applies to adult social care services to guarantee that information and communications preferences are identified, recorded, flagged, and shared in order to meet the needs of patients, service users, carers and parents with a disability, impairment or sensory loss. It does not apply to generic services. It is recommended that the standard is adopted across all services for disabled customers with impairment or sensory loss and roll-out built into the Customer		build into future specifications of customer relationship management systems
Services, to identify with the message and feel that they can trust the organisation.	(social media, print). These are often sourced from library images.	Increase images of real residents and service users in our photo library so images are more authentic and better represent local context.
4. Involving target audiences to understand what is effective for them	record communication preferences of their	Information on what we know about target audience communication preferences to be available on Accessible information and communication Intranet page.

		Build awareness into Customer Experience Culture Shift programme.
5. Designated web page for disabled people To make it easier for disabled people to access information that is most important to them we have a designated page, signposted from the Website Home page, with clear information about the service's highest priority for them such as accessible toilets, Blue badges and parking.	The Reading Services Guide is available and promoted as the online service guide for Adult Care and Children's Services users. It provides a comprehensive directory of statutory and voluntary and community services for Reading residents, for which a key target audience is disabled people. The website is due for review.	Explore the options as part of the review of the Reading Services Guide
6. Telephone hotline to support all areas of the website Provision of a Telephone hotline to support all areas of the website where people need assistance to find		Set up a hotline and ensure that staff that pick up this line are specifically trained to deal with these enquiries. This number could be used to provide targeted support.

what they are looking for, complete a transaction, report a problem with accessibility 7. Design accessibility into information and communication All communication to use clear, easy to read understandable, inclusive language and simple, uncluttered design. Use of Trebuchet (sans serif) font and a minimum font size of 12 point for paper copy	at https://intranet.reading.gov.uk/manual/intrane t-guide/accessible-content -providing a link to a very detailed GOV.UK guide It specifies sans serif font	Develop a comprehensive template for accessible on-line and off-line communications, both internal and external. Raise awareness through link on Accessible information and communication Intranet page. Include in training
8. Provision to meet needs on request	providing consistent customer experience across all channels across the Council and to providing services that are accessible for all and sets out	Raise awareness through link on Accessible information and communication Intranet page. Include in training
9. Provision to meet need identified in the design process	Assessments which will include consideration of how information will be communicated, and	Develop a standard set of principles and criteria, based on data and evidence of need and demand, for when and where we provide translations.

	decisions are made on a project by project basis which may lead to inconsistency in our offer.	
10. Interpretation and translation We will meet our Equality and Care Act duties by providing an Interpretation and Translation (I&T) service. We will provide clear information to customers about how they can ask for interpretation or translation and clear information for staff on standards and how to request a service on behalf of a customer.	Translation (I&T) Team which procures services through a framework on behalf of Council services who then have SLAs or Pay as you go with I&T. Services respond to individual needs or requests from residents who need to understand information in their preferred form of communication, by booking a translation or	Information on the service included on accessible information and communication Intranet page providing information on what services are available, how to access languages most requested Add a specific 'accessibility' option in the form where customers can ask for alternative format or suggest accessibility improvements.

	every page on the website (tab on the right of the page - also accessible to assistive tech)	
11. Staff informed and trained on accessible information and communication We will provide training and resources for staff on communicating in an inclusive and accessible way. This will be based on the Accessible Information Standard and WCAG 2.1 We will establish accessible information and communication section on our Intranet where staff can access Training Accessibility guidelines and resources Accessible Information Standard and WCAG 2.1 Interpretation and translation service	the Intranet https://intranet.reading.gov.uk/section/how-do-i/communicate-information where staff can find: a checklist on information on website	Design and deliver training programme Establish accessible information and communication section on Intranet inc links to: Training Accessibility guidelines and resources Accessible Information Standard and WCAG 2.1 Interpretation and translation service

Accessible Information and Communication Implementation Plan

Task	Detail	Timescale
Accessible information and communication Intranet page	 non-technical summary of the WCAG 2.1 	December 21
Comprehensive template for accessible on-line and off-line communications, both internal and external	 Scoping of documentation Design of template Communication plan 	December 21
Training package	 WCAG 2.1 NHS Accessible Information Standard Inclusive communication Built into Customer Experience Culture Shift/Team Reading programme 	December 21 December 21 TBA

Task	Detail	Timescale	
Adoption of NHS Accessible Information Standard across all services	Care Improvement plan	September - December 21 link to Amio Futures Gov Digital accelerator project on MOSAIC	
identified in the design	Develop a standard set of principles and criteria, based on data and evidence of need and demand, for when and where we provide translations.	December 21	
Positive Images	Increase images of real residents and service users in our photo library so images are more authentic and better represent local context.	October 21	
	Explore the options as part of the review of the Reading Services Guide	ТВА	
Telephone hotline to support all areas of the website	Build into Customer Experience Programme work on the website	ТВА	
'accessibility' option on webpages for customers to ask for alternative format or suggest accessibility improvements.	Build into Customer Experience Programme work on the website	TBA	