

IMPACT

FROM INSIGHT TO INFLUENCE

NIA Project: LIV Segmentation

Best practice in engaging LIV consumers

Prepared for Electricity North West

Prepared by Energy Systems Catapult & Impact

06/03/2023

Project No. 1282

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1. Background and Objectives

Impact Research were commissioned to undertake NIA-funded research for Electricity North West related to Low Income and Vulnerable (LIV) consumers. The aim of this research is to provide electricity Distribution Network Operators (DNOs) and Gas Distribution Networks (GDNs) with a better understanding of the needs of LIV consumers in order to develop more efficient, targeted services that will help to deliver lower cost to serve, higher social return on investments and a readiness for future vulnerabilities and changing energy markets. With energy being an essential service that affects people's comfort and health, it is imperative to ensure that the needs of all consumers are met and that the most vulnerable are adequately protected for the future market, especially in light of the cost-of-living crisis, post Covid-19 and the war in Ukraine.

Vulnerability is a complex issue. The term "vulnerable" itself is associated with stigma, causing some consumers who are classified as vulnerable by companies to simply not perceive themselves this way¹. This can result in consumers missing the support that is available from DNOs and GDNs. Further complications come from the multidimensional nature of vulnerable circumstances as they are rarely experienced in isolation. This makes it difficult for vulnerabilities to fit into neatly separated categories. However, the term is still widely recognised and used by operators. Specifically, the definition in the energy sector given by Ofgem, made intentionally wide to capture how vulnerabilities can be transitory as circumstances change or permanent:

"[Vulnerability is] when a consumer's personal circumstances and characteristics combine with aspects of the market to create situations where he or she is:

- Significantly less able than a typical consumer to protect or represent his or her interests in the energy market; and/ or
- Significantly more likely than a typical consumer to suffer detriment, or that detriment is likely to be more substantial.²

In the report 'How LIV Consumers are Currently Defined'³ Impact Research established a range of different 'lenses' through which to view LIV consumers, their diverse needs and the existing and planned initiatives designed to meet them. This was achieved through a literature review of reports by the electricity and gas sector as well as other third parties covering issues surrounding LIV consumers relevant to the utilities sector. The report identified 5 lenses: Safety, Finance, Technology, Electricity & Gas Supply, and Customer Relations, some including further granularity through sub-lenses. A range of vulnerabilities were identified as relevant to each lens, reflecting the diversity of consumers that DNOs and GDNs serve.

This report builds on the findings of the 'How LIV Customers are Currently Defined' report to recommend best practise for the energy sector in defining the different types of vulnerability. This was achieved through a review of the detailed consumer types affected by each lens and a consolidation exercise to identify key groups aligned with common industry classifications and prioritise them by breadth of relevant lenses. The report also recommends appropriate methods for engagement with people of each vulnerable group, drawing from a review of accepted best practice in research, trials and engagement with vulnerable consumers.

¹ Final Report, The Commission for Customers in Vulnerable Circumstances, <https://www.cicm.com/wp-content/uploads/2019/05/CCVC-Vulnerability-Report-2019.pdf>

² Consumer Vulnerability Strategy 2025, Ofgem, <https://www.ofgem.gov.uk/publications/consumer-vulnerability-strategy-2025>

³ How LIV Customers are Currently Defined, Impact Research, <https://www.enwl.co.uk/globalassets/innovation/enwl032-liv-segmentation/how-liv-customers-are-currently-defined.pdf>

2. Defining vulnerable consumer groups

Impact's 'How LIV Customers are Currently Identified' report identifies 27 different consumer types affected by the various lenses. This is too many for DNOs and GDNs, or our research, to be able to practically target individually. However, some clear themes and categories emerge within the granularity of the different consumer types, enabling us to distil them down into seven categories (with some subsets) for consideration: elderly, physically impaired, mental health impairments, low income, residential barriers, technical barriers, poor access to information. See Table 1 below for the lenses applicable to these categories.

The categories identified are in line with common classification of vulnerable individuals applied across the energy and research sectors. For example, the Priority Services Register (PSR) includes those of pensionable age, who are disabled or have a long-term medical condition, have a hearing or sight condition, a mental health condition, or extra communication needs (e.g., do not speak English)⁴. Work by Wales & West Utilities, 'Engaging with consumers in vulnerable situations: a research guide', used the PSR as a starting point to consider vulnerabilities and added single parents to children under the age of 5, people at risk of fuel poverty, reliance on benefits and considered tenancy and ethnicity⁵.

In defining each category, it is useful to consider the following:

Age

Whilst vulnerabilities can occur at any age, people of pensionable age can be affected under many of the lenses identified and could be considered most impacted as a result.

Physical impairment

It is useful to consider the range of physical impairments as one category to focus plans when researching or engaging consumers because of the number and variation in vulnerabilities that must be considered. However, four important sub-categories emerge when considering energy in particular, each with potentially different needs:

- those who are medically reliant on energy (e.g., for mobility aids or oxygen)
- those with chronic health issues
- those with other physical disabilities
- those with visual and/or hearing impairments

Mental health impairment

It is important to be aware that there is a broad range of mental health vulnerabilities. Some will struggle with cognition, understanding engagement or services, others might be able to understand but struggle with the social side of interactions with energy stakeholders. Furthermore, those with depression or anxiety might have the capacity to understand and engage but experience other blockers. Regardless of the nature of their impairment, those in this category are typically affected by the same broad range of lenses.

⁴ <https://www.ofgem.gov.uk/information-consumers/energy-advice-households/getting-extra-help-priority-services-register>

⁵ <https://www.wwestutilities.co.uk/media/4422/engaging-with-customers-in-vulnerable-situations-a-research-guide.pdf>

Note that those with hidden vulnerabilities can be hard to identify and so are difficult to action appropriate measures for.

Low income

Low income is one of two factors driving fuel poverty, the other being high energy need. Fuel poverty itself can be hard to measure and identify; different calculations are applied in different areas and the data driving those calculations hard to access. Those on low income are also affected by more lenses than when considering the impact of fuel poverty itself. Consequently, self-reported income or ability to pay for energy provides a more useful focus for considering the needs of consumers in research and engagement activities.

Residency

A range of different residency circumstances exist, reflecting different types of home, ownership status, location and occupancy. Some of these may raise the risk of energy vulnerability, with each being affected by a different lens and occurring in large numbers across the UK. Therefore, a spread of residency circumstances should be considered for any research or engagement strategy, including lone-parent households, renters, and rural communities.

Technical barriers

Some home characteristics can give rise to vulnerability through the technology lens. For example, old homes with poor insulation may be unsuitable for heat pumps without prohibitively costly retrofit measures, and those without smart meters may not be able to access new energy services. It is important to consider this group when exploring the technology landscape; however, this is the only lens which affects them and they are, perhaps, of lower priority for DNOs and GDNs to consider.

Poor access to information

Poor access to information can be driven by poor literacy skills, poor English language skills, speech difficulties and/or digital exclusion. There will be some overlap between drivers of barriers to information, but it is worth considering each separately when planning engagement activities or service provision since each will have different needs.

Table 1. A Classification of Vulnerable Consumer Types and the Energy Topics Affecting Them

Vulnerable Consumer Type	Lenses Applicable (From the Impact report 'How LIV Customers are Currently Identified')					Included in current PSR	Focus for future engagement
	Safety	Finance	Technology	Energy Supply	Customer Relations		
Age						Y	Y
Young & Uninformed							
Elderly						Y	Y
Under 5s in the household						Y	Y
Physical Impairment						Y	Y
Medically reliant on energy or mobility aids						Y	Y
Chronic health issues						Y	Y

Other physical disabilities						Y	Y
Deaf and/or blind						Y	Y
Pregnant						Y	Y
Anosmia (lack ability to smell)						Y	Y
Mental Impairment						Y	Y
Mental health difficulties or cognitive impairment (e.g. dementia)						Y	Y
Other hidden vulnerabilities							
Low income							Y
Living in Fuel Poverty							(*considered with those of low income)
Living in deprived areas							
Low/unstable income AND sudden/temporary unemployment							Y
Residence barriers							Y
Facing homelessness / temporary housing							
Lone parent households							Y
Renters							Y
Rural communities and/or off gas grid							Y
Technical barriers							Y
Live in old homes							Y
No smart meter or other tech							Y
Poor access to information						Y	Y
Poor literacy skills AND/OR non-/poor-English speakers						Y	Y
Speech difficulties						Y	Y
Digitally excluded (Lack of skills or lack of interest)						Y	Y

Implications for DNOs and GDNs

All seven categories of vulnerability identified in this programme of work should be considered when designing consumer engagements, from simple communications to service design and provision. Without this there is the risk that some consumers are unable to access vital services on a level with other people, and some may be left behind during the net zero energy transition.

Some groups of vulnerable consumers are affected by more of the lenses identified – up to four for those with physical or mental impairments. It is important for DNOs and GDNs to be particularly aware of these groups, considering the multiple ways in which they can be at risk of vulnerability, and the ways in which these lenses might intersect, in all of their activities. Those groups affected by multiple lenses include elderly, physically disabled, mental health impairments, low income, poor access to information.

Other vulnerable consumer groups might only be affected by one lens but could face significant challenges, e.g., digitally excluded people, and/or be present in large numbers, e.g., tenants. Awareness of these groups of vulnerable people is equally important for the DNOs and GDNs in order to consider the impact of, and access to, each activity they undertake. However, it is more likely that these groups are only relevant when considering certain engagements or activities. Those groups affected by specific lenses include most residency barriers (lone parent households, renters, etc.) and those facing technical barriers.

It is also important to keep in mind that vulnerability is not an absolute, there will be people who are more or less vulnerable within each group. Vulnerability can also be long-term, fluctuating or short-term and so consumers identified as vulnerable at one point in time may not be (at all or to the same extent) in the future.

Implications for the research

When considering the planned research to understand and segment LIV consumers, the classification of vulnerabilities and lenses affecting each has the following implications:

- 1. Organising the research by lens will be more practical than by respondent type**
The breadth of lenses affecting some consumer types is too large to easily cover in one research discussion (group or interviews). Furthermore, the variety within some respondent groups makes a conversation about multiple lenses more challenging since different lenses are relevant to different people and some respondents may only find one lens relevant.
- 2. Those vulnerabilities which are affected by multiple lenses could be considered the primary focus for the research** and should be reflected within the sample for each lens.
These include: elderly, physically disabled (especially reliant on energy, deaf, blind, chronic conditions), mental health difficulties, low income, poor access to information, rural and/or off gas grid.
- 3. The sample for some lenses should be supplemented with those vulnerable groups which are particularly affected by that lens only.**
These include lone parent households, renters, those in homes unsuitable for new technologies or without smart meters and other enabling technology, e.g., reliable fast internet access.
- 4. The transient nature of vulnerability makes it important to ensure recency in the experience of the vulnerability** amongst research participants and to **explore the impact and experience of different levels of vulnerability** (e.g., mild and/or short-lived through to severe and/or permanent)

3. Best practice engagement

Types of engagement

Engaging the public and different consumer groups can be achieved in a variety of ways. Many of these will be applicable across most of the vulnerable consumer groups identified above if designed with their needs in mind. Of note, there are two broad categories of engagement as defined in Table 2.

Table 2. One- and Two-way Engagement Strategies.

One-way engagement: <ul style="list-style-type: none">• Website describing trial and updates• Social media: Twitter, Facebook, LinkedIn• Newsletter• Local print and broadcast media• Disseminating information via consumer groups such as Citizen’s Advice or community groups	Two-way engagement: <ul style="list-style-type: none">• Community events• Citizen’s jury of local people• Research activities (focus groups, surveys, interviews)• Engagement through (mainly local) organizations such as local government, faith and charity groups
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One-way engagement, such as social media, can be useful to provide information, but without feedback it is hard to know the reach of a message or how well it is understood. Two-way engagement, in which the community can voice their opinions and have some degree of input, may build stronger engagement and ‘buy-in’ but is likely to have a lower reach and is more resource-intensive to achieve.

Planning your engagement

The success of any consumer engagement, be that a communication or service, hinges on being well-planned and considered. This is particularly true where one or more vulnerabilities might be present.

There are 4 stages to consider when planning a consumer engagement:

1. Define your audience.
 - a. Who do you need to engage with?
 - b. This will influence the development and delivery of the engagement:
 - c. Different groups of consumers may have incompatible needs and so services and support must be designed with a targeted user in mind. Recognising these different needs is essential so that vulnerable consumers are not disadvantaged when accessing services, support, etc.
 - d. Consider including care professionals in your audience⁶:
 - e. Some of the most vulnerable consumers are difficult or inappropriate to engage via two-way channels. Carers are well placed to give an objective view of the impact of a vulnerability and how it can be supported where the patient may be reluctant to discuss, or acknowledge, the severity of their vulnerability.

⁶ <https://www.wvutilities.co.uk/media/4422/engaging-with-customers-in-vulnerable-situations-a-research-guide.pdf>

2. Understand your audience.
 - a. Picture a typical member of this group and describe them: what are their needs, wants and challenges relevant to the engagement? These could be to do with the topic, e.g., net zero, and the engagement approach. Consider 'where' the audience are, for example are they online, exclusively off-line, attending community or interest groups?
 - b. You could create a persona to describe, like [these](#) disability personas provided online by the Central Digital and Data Office.⁷
 - c. Draw on all available information to do this: consumer data, market research, online sources.
3. Plan your engagement
 - a. What do you want to achieve?

This could be a behaviour change, a business outcome, understanding on a certain topic. Keep this in mind to ensure the engagement meets the end goal.
 - b. How will you achieve this?
 - c. Think back to the audience definition and profile above, what do you need to do to engage with this group? What needs, concerns, questions might they have? Start broad and hone in:
 - i. Choose a method of engagement (e.g., a letter);
 - ii. Identify how to deliver it (e.g., via email and post, including a large font version and translations into key languages);
 - iii. Consider who it should be positioned from (e.g., will you co-brand it with a familiar community group?);
 - iv. What will it say? (Think back to the needs of your audience to tailor the message);
 - v. Check that everyone can access it in the best way for them? Make it as inclusive as possible.
 - d. Before you progress, loop back and check your plans will deliver your goal.
4. Pilot the engagement with the intended audience.
 - a. The best way to find out if your engagement plan will be a success is to try it out. Invite a small number of relevant consumers to comment on it, asking for feedback on topics such as:
 - i. Can then access it easily?
 - ii. Do they understand it?
 - iii. Does it work in the intended way?
 - iv. What could be improved?

Principles for engagement

When engaging with vulnerable consumers, the following broad principles should be followed:

- Plan to include a representative range of consumers in your engagement.

As one example, there are over 10 million disabled people in the UK⁸, this means it is likely that some will be in the target pool for any engagement or service.
- Consider all relevant types of consumers as early as possible in the development of any engagement.

This creates the greatest opportunity to ensure it is suitable for everyone.

⁷ <https://www.gov.uk/government/publications/understanding-disabilities-and-impairments-user-profiles>

⁸ <http://odi.dwp.gov.uk/disability-statistics-and-research/disability-facts-andfigures.php#qd>

- Approach all engagement with empathy, understanding and respect.
- Be flexible to the needs of the individual where possible, they are more likely to engage and the outcome will be better.
- Ask people how they prefer to be contacted and offer a variety of methods to best meet everyone's needs, for example: large print hard copies, electronic files, foreign translations.
- Ask if they need any other assistance (not all are aware of the PSR, and some may not fit the criteria but have other vulnerabilities).
- Consider who you might be unintentionally excluding through your choices of how people can participate. For example, if an engagement is conducted via video call you are restricting the activities to participants with digital skills, a video camera and reliable broadband.

When communicating directly with vulnerable consumers consider that many vulnerabilities manifest as anxiety about the unknown and communicate ahead of time as appropriate. Some people find it difficult to differentiate between genuine calls and unwanted or unsolicited sales calls. Endeavour to make clear who is calling and why to give reassurance. Finally, keep all communication clear and simple, using short sentences, and have available relevant support information should it be needed by the consumer, e.g., contact details for local and/or national energy charities.

It is difficult to identify all vulnerabilities or know the extent of the vulnerability experienced in advance. Those engaging with consumers will need to be able to identify potential vulnerabilities during any consumer interaction and react accordingly, tailoring their interaction to the individual. DNOs and GDNs should consider training staff to be able to recognise vulnerabilities and respond appropriately.

Making it accessible

Accessibility is about making sure any consumer engagement or service can be used by as many people as possible. It should be the responsibility of everyone in the team. The concept of accessibility applies to everyone, not just disabled people. For example, someone's ability to use a service could be affected by their: location (somewhere noisy or an area with slow Wi-Fi); health; equipment (they could be on a mobile phone or using an older browser)⁹.

Key principles for making an engagement accessible include:

- Ensuring that electronic files work on commonly used assistive technologies including screen magnifiers (Windows Magnifier and Apple Zoom), screen readers (e.g., JAWS, NVDA, VoiceOver, TalkBack) and speech recognition tools (Dragon).
- Information that might normally be distributed on paper should also be available electronically where appropriate to ensure that assistive technologies can be used.
- Information should follow a linear and logical format.
- Ensure digital engagement can be navigated with a keyboard only.
- Use clear descriptions for buttons, links, etc.

There is a wealth of guidance available online about making services accessible, including on the UK government website.

- A guide on how to design accessible services can be found here: <https://accessibility.blog.gov.uk/2016/09/02/dos-and-donts-on-designing-for-accessibility/>
- Information on how to test them with users can be found here: <https://www.gov.uk/service-manual/technology/testing-with-assistive-technologies>

Partnering with others to engage consumers

Contacting your consumers directly using an existing mailing list can be a quick and efficient way of reaching people. But lists only target current consumers and some people may not read materials they assume are irrelevant to them.

Partnering with other organisations can help to reach a broader spread of people, for example, if trying to understand the needs of a particular consumer group and achieve deeper engagement. This could apply to one-way channels of engagement, where consumers may be more likely to read information if it is from a trusted source and delivery can be better targeted to specific groups. Furthermore, consumers are more likely to engage if written materials are provided during a conversation with someone trusted, like a community leader or health worker.

Partnering is perhaps most powerful when adopting two-way engagement methods. For example, local groups are well placed to support community events or workshops by promoting the activity, identifying suitable venues, and facilitating the discussion.

Potential partners include:

- Those delivering health support, e.g., GP practices, carers, community support groups
- Those delivering social support, e.g., community support groups, community centres
- Those with a relevant membership, e.g., a private or social housing tenants' group, those focusing on a specific group, e.g., disabled people, or particular issue, e.g., immigration, energy

⁹ <https://www.gov.uk/service-manual/helping-people-to-use-your-service/making-your-service-accessible-an-introduction>

- A charity with a focus on a particular vulnerability, e.g., long-term health conditions, lone parents

Specific vulnerability considerations

The Office for Disability Issues identifies key considerations for involving disabled people in social research which apply across consumer engagement activities with these audiences.¹⁰ The below table summarises their detailed guidance and supplements it with observations from Energy Systems Catapult experience and the Market Research Society Best Practice for Research with Vulnerable Participants.¹¹

Vulnerability	Considerations	Approach to engagement
Hearing Impairments	<p>May rely on:</p> <ul style="list-style-type: none"> - a hearing aid - lipreading - BSL - written communication <p>A loop or infrared system helps people who use a hearing aid to hear sounds more clearly by reducing background noise. They're often in public buildings.</p> <p>Most people who are severely or profoundly deaf rely on lipreading and writing to communicate.</p>	<p>Paper/postal engagement is accessible to all with hearing impairments except those who are deaf-blind. Note that those with hearing impairments cannot easily respond to call backs and may more easily respond by phoning a supplied telephone number themselves. If a telephone number is provided to get more info include a textphone number and/or Talktype number.</p> <p>A face-to-face discussion relying on speech is accessible to those with a mild – moderate impairment if using a hearing aid. Visual aids are an effective way to support this discussion.</p> <p>For those relying on lip reading for face-to-face communication, keep interactions short as this can be very tiring.</p> <p>Make a BSL translator available for those who prefer this means of communication.</p> <p>Telephone discussions can be accessible to hearing impaired people by using a textphone, RNID Typetalk or by texting questions and receiving text answers.</p>
Visual impairments	<p>Most blind and partially sighted people rely heavily on speech communication. Communication based on the written word is problematic to varying degrees, depending on the severity of the impairment.</p>	<p>Face-to-face or telephone discussions are well suited to those with visual impairments but should not rely on visual aids.</p> <p>Written materials may be accessible to those with mild visual impairment if using a large and clear font, e.g., Ariel point 14 in black and white.</p>

¹⁰ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/321254/involving-disabled-people-in-social-research.pdf

¹¹ <https://www.mrs.org.uk/pdf/MRS%20Researching%20Vulnerable%20Participants%20best%20practice%20note.pdf>

	<p>Scanners (or Optical Character Readers) can be used to display standard print in an enlarged form on the computer screen.</p> <p>Speech synthesisers can be used to read text aloud from scanned text or from a computer file.</p> <p>There are also technologies to convert text and images in to braille.</p>	<p>Written communication should be short and the layout clear. Electronic copies should be made available which can be manipulated to suit users' needs or put through text-to-speech software.</p> <p>Note that some people will be excluded if communicating by paper.</p>
Manual dexterity impairments	<p>Can engage through both verbal and written information.</p> <p>May struggle with writing or typing if a response is required.</p>	<p>Any verbal discussion can be made accessible for those with manual dexterity impairments. Note that holding a telephone can be difficult for some so consider face-to-face options and video calls.</p> <p>Paper (e.g., postal) engagement is accessible unless it requires a written response. If so, communication should be sent electronically as many people find a keyboard easier than writing.</p>
Learning difficulties	<p>Having a learning difficulty or disability can affect the way someone learns, communicates or does other everyday things.</p> <p>There are many different types of learning difficulty affecting specific areas of learning, for example in relation to reading such as dyslexia. It can be mild, moderate or severe.</p>	<p>Information should be clearly presented and straightforward to understand, e.g., plain English, short sentences, avoid abbreviations and acronyms, avoid using the third person.</p> <p>Some people prefer to get information graphically. This does not necessarily mean they cannot read text. Publications and websites with simple text and images can help people to understand information.</p> <p>Speech is a suitable communication method for most people with moderate learning difficulties or disabilities. However, some people may have problems grasping complicated concepts and may not be able to absorb a lot of information at one time. Repetition may be important to help people remember what is being said. Providing comprehensive and accessible information prior to taking part will help.</p>
Mental health conditions, e.g., anxiety, schizophrenia	<p>Typical forms of engagement may be accessible, but staff may need disability equality training in how to communicate with people with specific mental health</p>	<p>Steps should be taken to ensure the topics of the engagement, their purpose and intended outcome are clear and do not induce stress.</p>

	conditions and be sensitive to their needs.	
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When considering consumer research activities in particular, face-to-face interviews in the home are the preferred option for many vulnerable consumers, particularly those with physical disabilities, health concerns or mental impairments. This is because it helps contextualise the challenges they face on a daily basis, negates the burden of travel and technology, and enables a trusted friend or family member to be present for support.

Focus groups can be problematic for some vulnerable consumers. Sessions held in person can place an increased burden on them if they are unable to travel easily or suffer from anxiety. Those that are digitally excluded may struggle to join remote groups.

All must give informed consent to take part, but with some vulnerable consumers, ability to give informed consent could be uncertain as their competence is uncertain, or it is socially difficult to give informed consent. The approach to getting consent should be tailored to the individual, e.g., in writing, verbal and recorded. We must be prepared to exclude people as needed if unsure of their informed status.

Implications for DNOs, GDNs and the research

This document contains a comprehensive look at the considerations when engaging consumers. To summarize, the following factors are essential to successful engagement:

1. Consider carers as a target group able to communicate on behalf of the consumers with significant mental impairments in their care.
2. Where consumers are hard to reach via traditional means, consider partnering with organisations such as community support groups, tenants' associations, relevant charities.
3. It is important to communicate with consumers via a range of channels and offer them a choice in how they engage, e.g., telephone, online, face to face.
4. For research purposes, individual interviews are better suited to tailoring the research method to support the individual.
5. In-home interviews may be needed to cater for the needs of those with physical and mental impairments.
6. Posting materials could engage the digitally disengaged community. Consider a familiar partner to support this endeavour, building trust and boosting engagement.
 - a. For research purposes, ESC experience is that a direct incentive per interview, rather than prize drawn, yields an appropriate response rate.
7. All written communication and research materials should follow the accessibility guidelines on simple and straight forward sentences and layout and be appropriate for assistive technologies such as screen readers.
8. Where it is difficult to be confident that informed consent has been given for an engagement, the participant should be excluded.