

# Accessibility Consultancy Process

## Abstract

This document outlines Colt's process for consulting with stakeholders with accessibility needs on the accessibility of our products, services, communications and employee and customer experience.

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**Department** Environment Social Governance team (ESG)

**Key Stakeholders** Brand & Digital team, Disability Accessibility Network (DAN), Regulatory team

**Dependants** Brand & Digital team

**Distribution** ESG Team, Brand & Digital team, DAN, Regulatory team, external stakeholders

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# Background

Colt's Diversity, Equity & Inclusion strategy is to build an inclusive culture where everyone can thrive.

One of our focus areas is supporting and enabling those with disabilities or long term conditions, whether visible or invisible. Ensuring we are an accessible organisation is a key part of this agenda, which we have launched Optimising Accessibility, Colt's accessibility roadmap.

In developing this roadmap, we have sought the views of those most impacted by a lack of accessibility, in particular those with a disability or long term condition. We developed a feedback mechanism for both our intranet to gain input from our employees, and our external website, to gain input from external stakeholders and customers, on accessibility.

## Building our roadmap

We engaged an external third-party provider to undertake an accessibility maturity modelling assessment of Colt in 2022, looking across areas such as Built environment, Technology, People Processes, Communications, customer journey, procurement and governance.

The objective was to gain a clear picture of Colt's maturity at that time to be able to build a realistic long term roadmap for the business.

### What was the process?

We held a series of stakeholder workshops, and included representation from our Disability Accessibility employee Network (DAN). You can find out more about our DAN network on our website in the [Inclusion & Diversity area](#). In these guided discussions led by Accessibility experts, we were able to gain a clearer view of the current state across key areas and identify improvement areas.

### What are the next steps?

Following these workshops, our provider put forward recommendations in July 2022. These inputs, along with stakeholders feedback, was used to develop our five year roadmap, Optimising Accessibility.

## Feedback process

### Internal stakeholders

On our intranet, we have an accessibility area. Employees can share feedback on the accessibility of our communications channels at Colt and other aspects of our employee experience. This can be done by completely a form (there is the option to remain anonymous or contact details can be shared).

They are also able to email [accessibility@Colt.net](mailto:accessibility@Colt.net) directly with any feedback.

We use employee feedback gathered this way, along with feedback from our Disability Accessibility employee Network (DAN), to make improvements. Longer term improvements identified feed into our Accessibility Roadmap.

### External stakeholders

A form on our site can be accessed at [www.colt.net/accessibility](http://www.colt.net/accessibility) where visitors to our site can send feedback on the accessibility of our site or the Colt products and services.

Users can also email [accessibility@Colt.net](mailto:accessibility@Colt.net) with any feedback.

All feedback is reviewed by the Diversity, Equity & Inclusion team, led by Rachel Collins. Feedback can also be shared directly with the team on +44 (0) 20 7039 2802.

We will accept requests to provide the feedback process document in the following alternative formats: print, large print, braille, audio format, electronic format that is compatible with adaptive technology that is intended to assist persons with disabilities. In the case of a request for a description in braille or audio format, we shall make the description accessible in the specified format within 45 days of the request. For a request in any other format, we will provide the information within 15 days.

## Use of feedback

Colt will acknowledge the receipt of non-anonymous feedback.

Feedback will be sent to Colt's Head of Diversity, Equity & Inclusion, Rachel Collins, who will share with the relevant stakeholders in the Brand & Digital, Customer, Communications, IT and Product teams to implement the Project.

Those giving feedback will have the option to give their feedback anonymously. Any data will be stored in accordance with data protection guidelines.

Colt will use any feedback received to make improvements where possible and any longer term improvements needed will feed into our Accessibility Roadmap. We will also consult with our Disability Accessibility employee Network (DAN) on the creation of our roadmap and plan to partner with a disability organisation to gather feedback.

## Disclaimer

Participation in this feedback process is voluntary and no confidential relationship is intended or created between the participant and Colt through the submission of the participant's feedback/suggestions, except to the extent mandated by data protection laws.

The usage, non-usage and manner of usage of feedback received shall be at Colt's sole discretion.

By participating in this feedback process, the participant acknowledges that to the best of their knowledge, any and all feedback submitted by them does not infringe the rights of third parties, in particular any intellectual property, confidentiality or privacy rights. Participants shall not be entitled to any compensation irrespective of Colt's decision to implement any suggestions received through the feedback process. Any intellectual property created or other rights arising as a result of Colt's use of such feedback shall vest solely with Colt.

## Confidentiality

Colt will take a proactive approach to ensuring that confidentiality is maintained. Any feedback collected by Colt will be used to identify any barriers encountered by persons that deal with Colt and develop the appropriate measures to remove such barriers.

Please note that the notification of adjustment will necessitate the sharing of relevant information with experts in order to facilitate appropriate improvements. The information shared is only to understand and achieve the implementation of an adjustment.

## Privacy

The information and personal data provided by you, Personal Data, will only be processed by Colt to implement its accessibility plan and for no different purposes. For this purposes, Colt will process your Personal Data, only for the necessary period to comply with all the legal obligations, and will be securely deleted afterwards. Your Personal Data will be treated in line with applicable data protection laws, including without limitation the General Data Protection Regulation. If you wish to exercise your privacy rights, please send an email to [Accessibility@colt.net](mailto:Accessibility@colt.net) together with

a document that can identify you, attaching the form related to the right you wish to exercise available at [www.colt.net/gdpr/](http://www.colt.net/gdpr/).

Should you have any questions, please contact the sustainability team at [Accessibility@Colt.net](mailto:Accessibility@Colt.net).

## Categories of personal data process, legal basis and purposes

Colt is handling the following the personal data (i.e. data which can be used to identify you) for the purposes described underneath:

What data?	Why?
<u>Contact Details:</u> name, surname, email, company name	To be able to be contacted by Colt with your consent for feedback gathered to make improvements and feed into our Accessibility Roadmap.

The legal basis to process your personal data is:

- (a) Your consent.
- (b) To comply with our legal obligations regarding Accessibility.

Colt may share your personal data with third parties in limited situations, as detailed below:

- Colt group companies: We may share your personal data with other companies that fall within the Colt group, for example for recruitment purposes, human resource management and internal reporting.
- Service providers and business partners: We may share your personal data with our service providers and business partners to identify any barriers encountered by persons that deal with Colt and develop the appropriate measures to remove such barriers.

Your information/personal data will be hosted in WordPress for one day only. WordPress servers store personal data both in the US and in the EU. After this, the information will be automatically erased. Your information will be sent directly to [Accessibility@Colt.net](mailto:Accessibility@Colt.net), at Colt Technology Services and located within the EEA and UK Servers. Colt may transfer personal data or makes personal data accessible to its subsidiaries (<https://www.colt.net/legal/>), subcontractors or otherwise located within or outside of the EEA or UK to develop the appropriate measures to remove accessibility barriers for the provision of the services. Colt transfers the Personal Data in compliance with Data Protection Laws and with EDPB Recommendations 01/2020 on measures that supplement transfer tools to ensure compliance with the EU level of protection of personal data. The transfers within Colt Group are carried out by means of its Binding Corporate Rules (BCRs).