



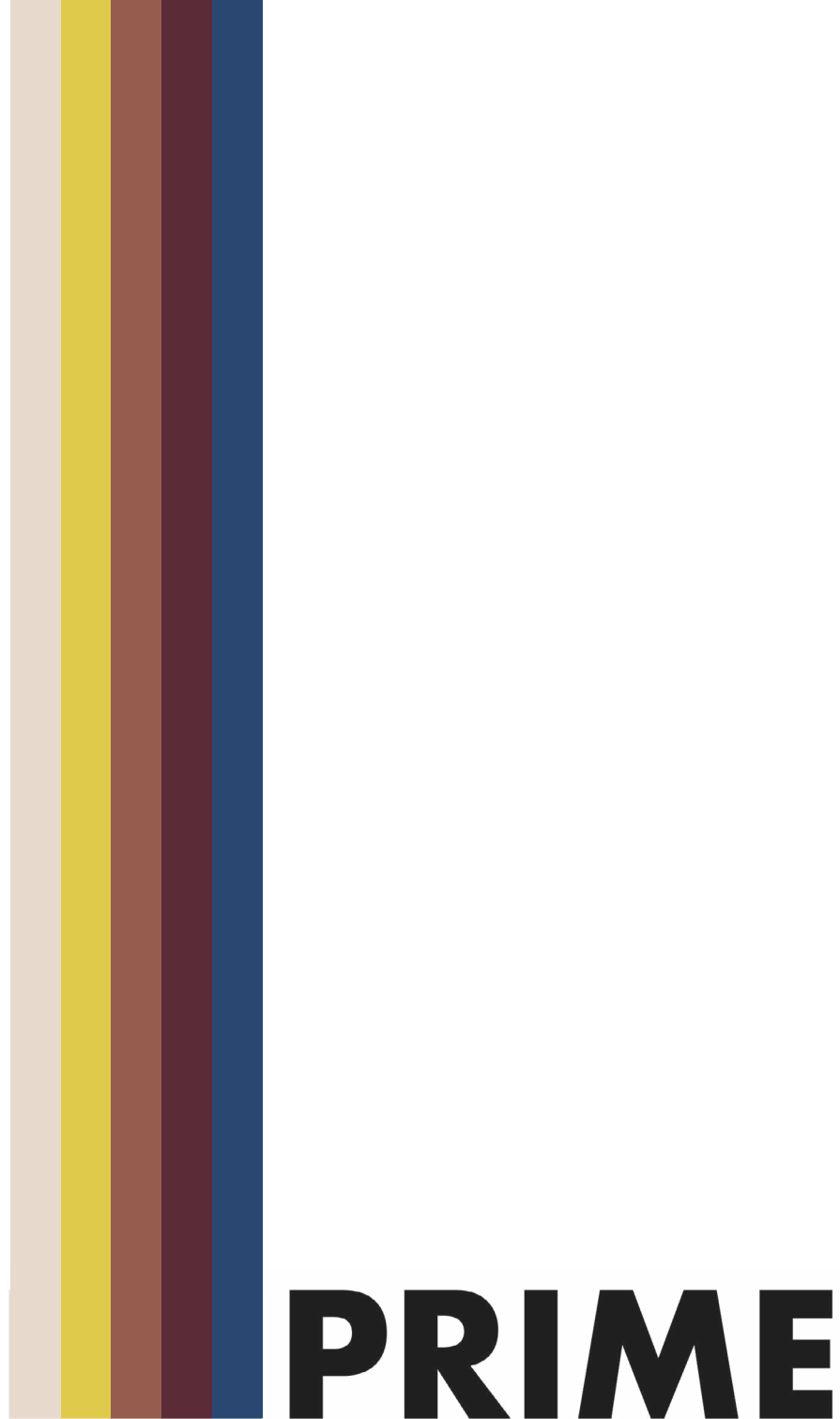
Protecting Minority Ethnic Communities Online

## MINORITISED ETHNIC PEOPLE'S CODE OF PRACTICE FOR EQUITABLE DIGITAL SERVICES



Engineering and  
Physical Sciences  
Research Council





Protecting Minority Ethnic Communities Online

## MINORITISED ETHNIC PEOPLE'S CODE OF PRACTICE FOR EQUITABLE DIGITAL SERVICES

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# INTRODUCTION

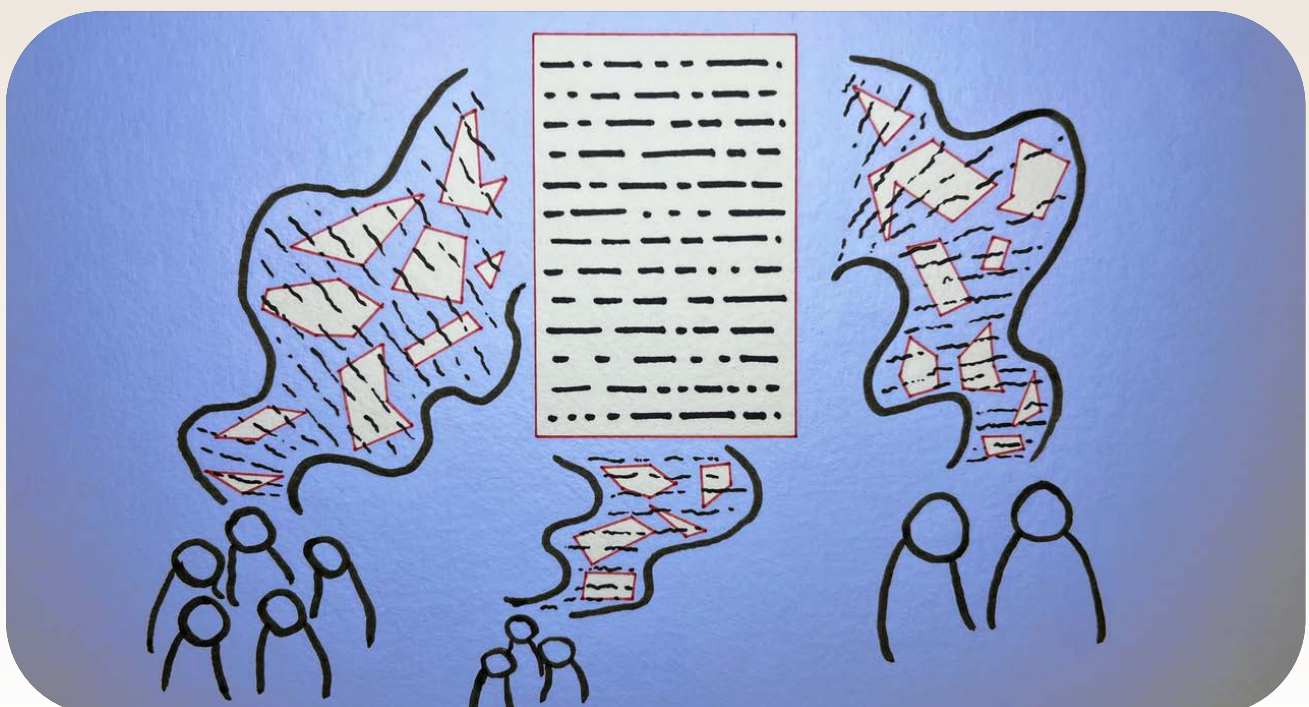
The Minoritised Ethnic People's Code of Practice for Equitable Digital Services (thereafter ME-CoP) contains principles and recommendations to guide the development of a digital service. The ME-CoP offers a guide to anchor your **decision making about the purpose of digital services, its design, delivery, and use of people's data**, including but not limited to, race and ethnicity information.

Through seven principles, it recommends how the design of digital services can help safeguard against some of the inequities Minoritised Ethnic people experience in access, outcomes, and their experiences of services.

The following seven principles have been **co-created** with minoritised ethnic community members as experts by experience, and also stakeholders

and representatives from across healthcare, third sector, social housing, design consultancy, public sector, local authorities, national regulators, and the data science community in the UK.

Each principle in this guide is presented here with a definition, an explanation of its importance and suggested examples of practice-related 'do's and don'ts' taken directly from participants across this research. Following this guide will support digital services to improve their systems and contribute towards the duties of upholding equity, fairness, and data privacy as laid out in the relevant UK legislations (e.g. the Equality Act 2010 and the Data Protection Act 2018).



## THE 7 CO-CREATED PRINCIPLES— At a Glance



### CO-CREATED PRINCIPLES FOR EQUITABLE DIGITAL SERVICES



**Fairness**



**Compassion**



**User-Centred**



**Accessible**



**Transparent**



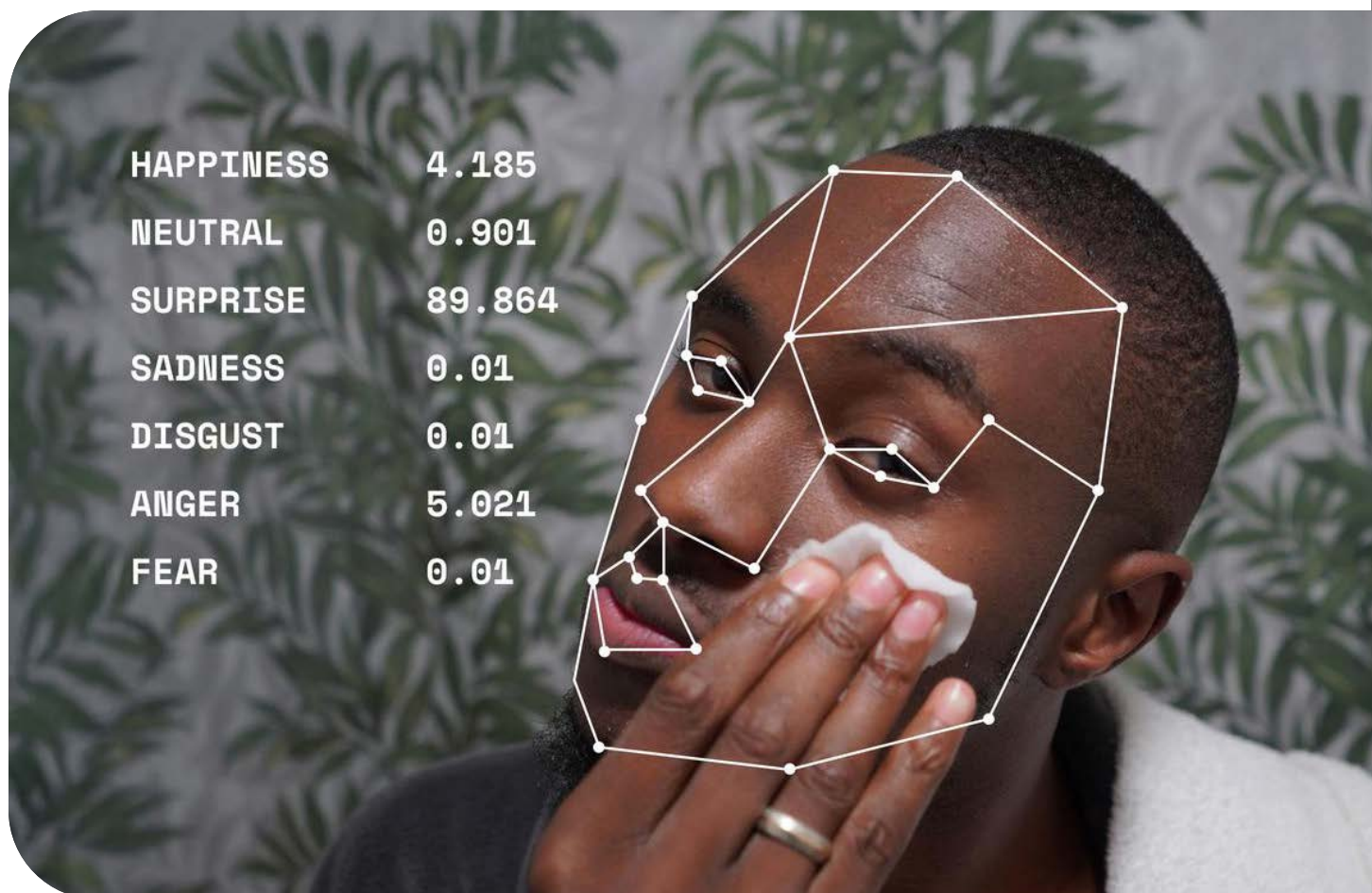
**Private & Secure**



**Trustworthy**

Figure 1 - Co-created principles for equitable digital services.





## WHY IS A ME-COP URGENTLY NEEDED?

The ME-CoP draws on the expertise of adversely racialised communities in the UK and their experiences of navigating digitalisation.<sup>1</sup> People from communities, that in the UK context are often labelled as 'Minority Ethnic,' are not a homogenous group and different minoritised ethnic groups have different needs and experiences of racism. Some people are more adversely racialised by systems of power and patterns of privilege. However, it is known that many people across these communities experience similarities of

what it means to be racialised by systems and processes which create or sustain inequity. Such shared experiences include; higher levels of social and economic deprivation, poorer access to and outcomes from services (e.g. healthcare, social housing, policing, justice), over-surveillance, social media targeting and abuse, in addition to experiences of direct racism and discrimination.

Furthermore, machine learning and Artificial Intelligence (AI) has been shown to replicate or facilitate biased decision making and processes. These include; ethnic 'penalties' or discrimination via proxy leading to increased costs for services (e.g. insurance, credit), biased devices and misdiagnoses in healthcare

<sup>1</sup> Racialisation is the process of constructing racial meaning onto others. As a white majority society, the UK, people and institutions categorise 'minority' people based on their skin colour, cultural or religious practices, which can perpetuate systems of inequity and marginalisation. In this CoP, we focus on the experiences of those minoritised by society and the subsequent injustice and impact of systemic, institutional and interpersonal racism that follows.





(e.g. oximeters), unlawful surveillance of racialised communities (e.g. facial recognition software), and misinformation and racist hate speech online.

These inequalities are often a product of institutional policies, inter-personal prejudice, and systemic discrimination facilitated by the way services are designed and administered.

This context cannot be ignored as services become further digitalised. It is necessary to centre racism for digital services to address the increased risks and harms they experience and redress the mistrust the experts in this research feel.

The ME-CoP aligns to four priority areas of concerns in response to increased digitalisation of key services:

**1. Address racism and poor prior experiences of services**

- Guard against historic, systemic and existing biases and inequities being reproduced by digital services.

**2. Understand the needs of people**

- Design services built on values of inclusion, dialogue, and co-design with communities.

**3. Protect data privacy and security**

- Underpin services with a duty of protection to ensure greater trustworthiness, transparency, and accountability.

**4. Administer accessible and easy to use services**

- Ensure services are adaptable, compassionate and uphold people's right to choice and individual agency.

Following the ME-CoP will enable the digital services you design or deliver to be led by the perspective of people with lived experience of 'race' and the myriad ways inequity is embedded within society.

**While there is no silver bullet, services must work to not reproduce inequities, by considering how their practice and digital services are meeting the seven principles.**

## SUMMARY LIST OF PRINCIPLES



### FAIRNESS

Understanding the various inequities in society and within your service and working to redress/minimise the potential for disparities.



### COMPASSION

Ensuring that particular people or groups are not disadvantaged by the way the service operates and offering choice in how people can engage with your service.



### USER-CENTRED

Knowing the range of people's needs and addressing the barriers different people face in using digital services, through inclusive and human-centred design.



## ACCESSIBLE

Services are flexible, supportive and adaptable to suit the diverse needs and changing circumstances of individuals. They are logical to navigate and are as simplified as possible in their design.



## TRANSPARENT

Honesty in communication to people about decision making and processes which affect them (directly or indirectly), and showing evidence of where positive changes have been made and how disparities are being addressed.



## PRIVATE & SECURE

Upholding group and individual rights to privacy, with clear protocols and communication with people on how personal or group data is collected, processed, managed and shared, with the option to refuse if desired.



## TRUSTWORTHY

Services upholding the rights of and working in the interests of its users and demonstrating transparency and accountability throughout (not just when there are problems).



## FAIRNESS

### WHAT DO WE MEAN BY 'FAIRNESS'?

A fair service is one which reflects equity in policy and practice. It upholds the principles of choice, inclusivity and human rights. It should not penalise anybody or reduce what services or benefits people are entitled to, for not using your digital service. A fair service is also one that is accountable to people, particularly those who are most negatively impacted, as well as upholding wider legal guidelines and regulatory standards.

A 'fair' service accounts for the social and economic barriers related to digital access (e.g. affordability of devices, internet connection), as well as personal or individual barriers (e.g. digital skills, confidence and engagement). For example, many people in the UK still live in digital poverty and do not have regular access to devices or internet connection,

may not have the literacy to read and write in English, or have the digital literacy needed to navigate the service as you (e.g. as a developer) might assume.<sup>2 3</sup>

By embedding 'fairness' into your digital services, you acknowledge the inequality and differences across people's circumstances and digital capabilities. You will design services with the most disenfranchised or under-represented people in mind. You will also support an understanding that different minoritised ethnic communities are not one homogenous group, and will accommodate for different requirements and needs.

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<sup>2</sup> British Academy, [Digital Poverty in the UK: Analysis of Secondary Data](#)

<sup>3</sup> Digital Poverty Alliance, [UK Digital Poverty Evidence Review 2022](#)

## WHY IS THIS IMPORTANT?

If you consider fairness in all aspects of the design of your digital service, then you are well-placed to provide an equitable service, able to meet the individual needs of users. It means you can be better placed to mitigate the potential risks negatively impacted groups may experience over others, in using your service.

A fairly designed service can adapt to the multiple realities of peoples' capabilities. This requires an understanding of social and economic inequalities and identifying ways to address them. This ensures you are not reproducing or furthering existing

inequalities. This understanding must also be intersectional – i.e. it considers the myriad ways different characteristics (e.g. disability status, gender and ethnicity) can impact users and compound their experience of inequity. For example, a person who is a first language speaker, may have a disability and face financial hardships, which might make it difficult to use a digital service.

The principle is therefore something to consider as central to your research, monitoring and evaluation practices, and as part of your commitment to Equality, Diversity and Inclusion.

## HOW CAN WE MAKE SURE WE MEET THIS PRINCIPLE?

### The suggested Do's and Don'ts

- > Do ensure online engagement is a choice for people
- > Do ensure that digital services work with different types of devices. Do not limit to one type of device, browser or operating system.
- > Do have baseline standards of service that offer parity across different communities
- > Do ensure availability of vital information, without the need to download or read through large amount of information
- > Do build on good practice of 'what works' for people in digital service design
- > Do recognise, understand and adapt to cultural sensitivities
- > Do undertake impact evaluations to address any biases or discrimination in data, AI systems or any automated processes and take steps to mitigate any impact
- > Do recognise the impact of digital poverty and address issues of affordability and access

- > Do map several user journeys to outcomes, in order to understand and anticipate how different barriers manifest in people's experiences of accessing your services, and design them to meet the needs of the most disenfranchised or marginalised people
- > Do ask service users for feedback to ensure your services are fit-for-purpose
- > Do understand how barriers interact with each other
- > Do encourage organisations to share research data and share learning
- > Do be realistic of digital costs in relation to the necessary costs of living (e.g. food) – people should not have to choose between food and the internet, as both are necessities
- > Do factor in the need to review, evolve and adapt services as time progresses and needs change
- > Do have robust recruitment practices so your service reflects a wider demographic with different lived experiences to draw on
- > Do develop or support existing in-community hubs that can offer resources and localised support, as they can understand local community needs. This is particularly important as many libraries and local centres are closing due to lack of funds, but have been a lifeline of support, advice and access to digital equipment for people particularly living in areas of high disadvantage
- > Don't assume the systems and processes you have in place now will be fit for purpose in the future
- > Don't limit availability of digital services or content to certain hours or days of the week. Focus on the convenience of the people, rather than the service providers. Do ensure online engagement is a choice for people
- > Do ensure that digital services work with different types of devices. Do not limit to one type of device, browser or operating system.
- > Do have baseline standards of service that offer parity across different communities
- > Do ensure availability of vital information, without the need to download or read through large amount of information
- > Do build on good practice of 'what works' for people in digital service design





## COMPASSION

*Compassion should be a key value that embodies the design and development of digital services so they are user-centred, fair and accessible. Respect for the autonomy of users should be an important consideration when designing digital services.*

### WHAT DO WE MEAN BY 'COMPASSION'?

Compassion in this context means having empathy towards people's needs and understanding how digital services can best serve people. This requires a considered understanding of the challenges, barriers and intersecting issues that can impact people's ability to engage with digital services. Compassion also means having processes and policies in place that prioritise support for users. Users should feel heard and listened to by services in order to cultivate trust within communities. People may be more likely to perceive digital services more positively, if services display an interest in wanting to resolve issues and capture feedback from users to inform service improvement and can evidence where there has been change.

Respect for autonomy is an important aspect of compassion. It means offering support to users so they can use digital services self-sufficiently within reason, without having to consistently rely on others. Services should not assume users will be able to access, or have family or friends they can rely on to mediate access. Respect for autonomy also means users having the option not to use a digital service if they do not wish to. This means services must keep alternative options open to people (e.g. telephone, face-to-face) and users must not be penalised or receive a lesser standard of service, if they do not choose to engage digitally.



## WHY IS THIS IMPORTANT?

If you consider 'compassion' in all aspects your design of digital services, then you are well-placed to build trust amongst diverse, marginalised communities. If you consider respect for autonomy in all aspects of your design of digital services,

then you will uphold the principles of fairness and equity. In ensuring users are supported to be able to use digital services effectively, it means you are not withholding, or they are not missing out, on any benefits to using digital services.

## HOW CAN WE MAKE SURE WE MEET THIS PRINCIPLE?

### The suggested Do's and Don'ts

- > Do invest in your workforce that deals with people
- > Do cultivate empathy and respect through workforce representation (e.g. recruit people with lived experience or people from minoritised ethnic backgrounds to work in the service)
- > Do make it easy to access and easy to understand
- > Do provide services that are authentic and empathetic
- > Do provide high-quality customer service (e.g. 'online chats' should have the option to speak to somebody)
- > Do ensure online access to services is a choice
- > Do raise awareness within communities of the support available to them
- > Do support the capacity building of community organisations allowing them to support the community better with digital access and dignity
- > Do provide options for users to borrow devices to access digital services
- > Do upskill people to build their digital confidence
- > Don't overwhelm people with too much information at the front door – make it relevant to them (e.g. test results and practitioner notes in medical language does not reassure or communicate much to average users, consider how this could be explained or presented better)
- > Don't meet people with the expectation that everything has to be done online

- > Don't overload your workforce – so they have time to help people properly
- > Don't make assumptions – draw on qualitative and quantitative evidence
- > Don't make people feel penalised when they make a mistake or do something considered 'not right' by you
- > Don't make people feel 'bad' or 'stupid' with error messaging or other communications





## USER CENTRED

*A user centred digital service is centred around people's needs and can adapt according to the different circumstances people face. Co-designing services should be a key consideration when designing your digital service so they are human centred, inclusive and fit for purpose – which can subsequently build trust.*

## What do we mean by 'user centred'?

Digital services should be designed with the needs and requirements of different users in mind so your service does not leave people behind. An easy to navigate digital service is a frequently cited need which is not being met adequately, as users often find it difficult to locate the important information needed to resolve problems. Your service should engage in research that involves different users in the design and testing process – particularly those users who are most impacted through digitalisation and

Artificial Intelligence. Your service will then be better placed to develop the solutions most relevant and needed by people.

Services should be flexible towards the user and should not penalise anybody who is unable to use the digital service: for example, by restricting range of access including financial options, access to discounted rates/offers, delays, and range of service options available to users.

## Why is this important?

It is important to consider that not everybody wants to use or is capable of using digital devices – particularly laptops and desktop computers. Services should design mobile-ready first, digital services but also offer alternative methods of engagement for users (e.g. telephone/face-to-face). This is not exclusively an issue of digital literacy for people (i.e. knowledge or skills in using digital devices/internet). It is also about people's self-confidence to navigate a digital service, their perception of whether a digital service can achieve the outcomes they need, poor prior experiences of services, wanting to minimise risks and potential threats to privacy, and people's desire to retain a sense of dignity by accessing services in a way they feel most comfortable to do so.

It is important to note that racially marginalised people are known to be more vulnerable to online harm.<sup>4</sup> This is in addition to more systemic inequalities that have been shown to produce poorer health, economic and social care outcomes for racially marginalised people in the UK.<sup>5 6</sup> All the while, many minoritised ethnic people carry experiences of direct racism, invalidations and microaggressions because of how they are racialised through systems and institutional cultures. It is therefore necessary to consider these

factors to understand how different users might already perceive or engage with your service, but to also ensure inequities are not being perpetuated or exacerbated through digital systems. There are opportunities for digital services to mitigate such inequities through their approach, design and monitoring processes.

Collaboratively designed services that work with a diversity of service users through participatory methods can help in ensuring different users can navigate and use the digital service effectively.<sup>7</sup> A co-designed service that collaborates with different users, to determine the purpose and priorities of the digital service, is central to developing equitable digital services. Further, this also provides a feedback mechanism that is necessary to address the current systemic inequities imbued within digitalisation and AI technologies.

<sup>4</sup> The Alan Turing Institute (2023) [Tracking experiences of online harms and attitudes towards online safety interventions](#)

<sup>5</sup> Nazroo, J. (2022), [Race/ethnic inequalities in health: moving beyond confusion to focus on fundamental causes](#), IFS Deaton Review of Inequalities

<sup>6</sup> Race Equality Foundation (2023) [Report: racism is the root cause of ethnic inequalities](#)

<sup>7</sup> Quyoum, A. and Wong M. (2024) [Valuing lived experience and co-design solutions to counter racial inequality in data and algorithmic systems in UK's digital services](#).

## How can we make sure we meet this principle?

By including the perspectives, experiences and needs of those most negatively impacted through digital services and AI – in this case minoritised ethnic people – a co-design approach to service design ensures digital services are aligned with the values and needs of people.

The concept of co-design means engaging with people in a non-tokenistic manner, who are representative of wider society. This necessarily includes those who are under-represented, marginalised and most at risk of social and economic inequities. Co-designed services promote a user-centred approach, supported through participatory research evidence.

By considering co-design as part of the development of digital services, the needs of your users will be accounted for from the outset. This means you are better-placed to design services that are inclusive, trustworthy and accessible – which will be more cost-effective in the long term.

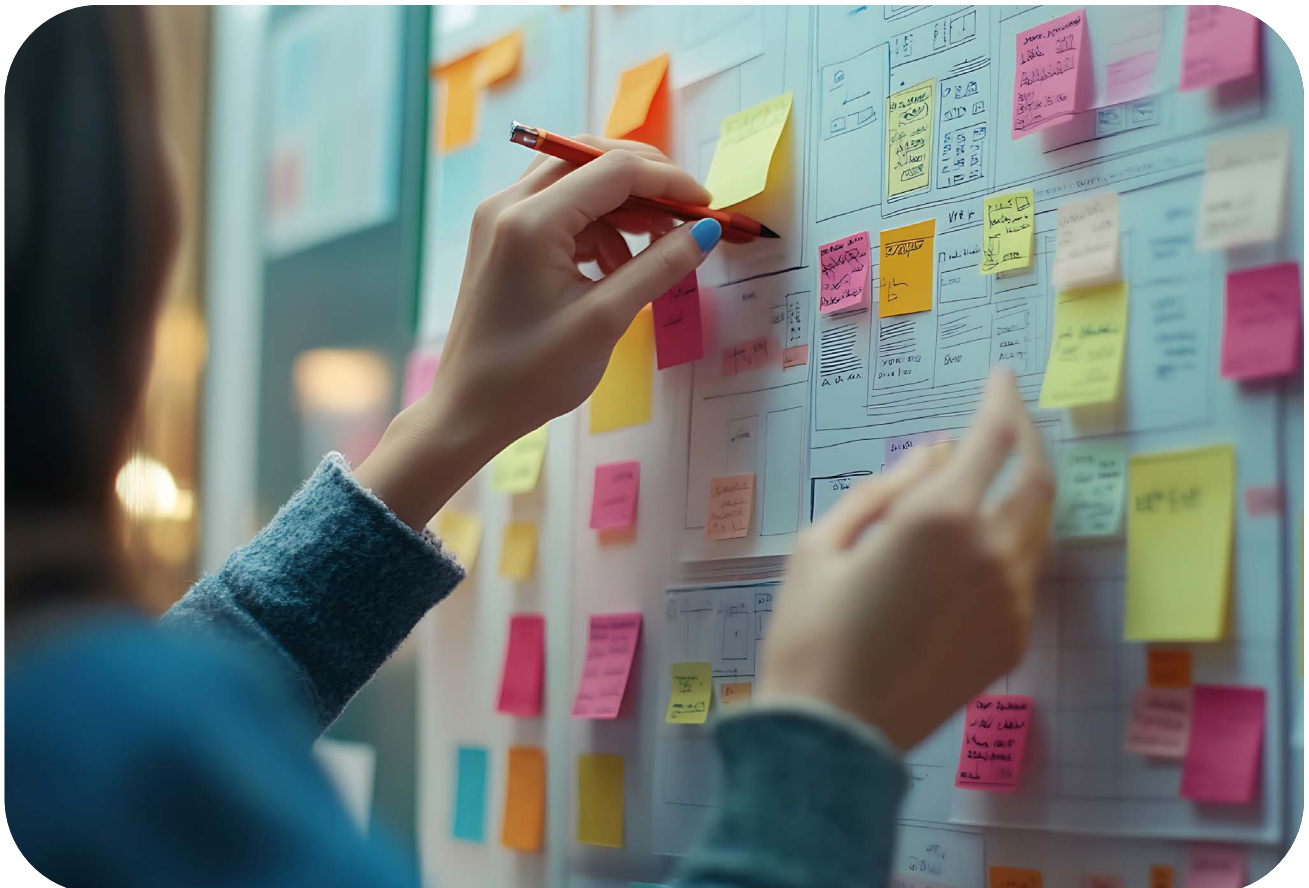
You should consider how you can involve and incentivise a diverse range of people to take part in the co-design process or wider research and evaluation activities. Pay and compensate people for their time and participation and acknowledge their contribution where appropriate.

### The suggested Do's and Don'ts

- Do use local knowledge through engaged research or participatory workshops to ensure users' lives and experiences are centred when designing apps / websites
- Do make use of existing data and commission research where there are gaps to inform the design of digital services so they are consumer or user friendly
- Do ensure your service is flexible. For example, this means a person not having all the information (e.g. supporting documentation) should not be an immediate barrier to participation and access.
- Do provide services that are authentic and empathetic, and not robotic (relates to the principle of compassion discussed earlier)
- Provide alternative options of engagement (including in-person, non-digital interactions)
- Do keep users' choices open – nothing should be final and set in stone, where possible.



- > Do train staff within services to be adaptable
- > Do be willing to accommodate for misspelling and grammar mistakes
- > Do engage with local groups and community organisations to support your work and understand communities better
- > Do evidence where research has led to a change or made an impact (relates to the principle of trustworthy discussed later)
- > Don't create 'road blocks' for people where people become stuck and cannot get past an initial point of contact
- > Don't make customer services too scripted – allow users to get through to a human
- > Don't present chatbots as being a 'human'
- > Don't use chatbots as an option to speak to somebody when they are not capable of resolving the issue
- > Don't use complex language – opt for commonly known words
- > Don't have multiple platforms for one service (e.g. NHS England app + Patient Access)
- > Don't assume certain communities are 'hard to reach' to avoid conducting research or doing the work needed to address gaps in understanding
- > Don't over-promise and under-deliver (relates to the principle of transparency discussed later)





## ACCESSIBLE & EASY TO USE

*Digital services should be simple, easy to navigate and use, and supported with accurate and up-to-date information. Services should be easy to use for a diverse range of users regardless of age, background, language abilities, and additional needs.*

### What do we mean by 'accessible and easy to use'?

Making digital services accessible and easy to use means taking into account a person's needs to ensure everyone is able to use the service effectively. This includes using clear and plain language, providing audio and videos so people can see/listen to key information, compatibility with screen readers and other assistive technologies, larger font sizes, icons, images etc – so it is easier for people to understand what is being communicated to them and what is the most important to note.

Providing multiple language options is an important consideration too. Where possible, the design should be as simple as possible. Including images, animated videos and layouts that flow regardless of device used to access, should be included. Mobile ready services should be prioritised for development, as more people are able to access digital services through personal smart phones, than laptops or desktop computers. However, users should not have to download large apps or plug-ins, which take up sizeable memory space on older devices.





## Why is this important?

Designing services that are accessible and easy to use ensures the same information and options are available for everyone—no matter their accessibility needs, type of device access, or language needs. An easy to use service supports users' desire for dignity and mitigates potential issues around over-relying on others for support, which may create barriers in when/how a person can access the service and their right to privacy.

You should consider how you can continually embed and improve accessibility in the long term planning of your service. Design a digital service to be barrier-free for users by maintaining simplicity in design. For example, avoid unnecessary 'click-throughs' to get to the options or information most users need. Instead, design to achieve what users need as quickly and as easily as possible.

## How can we make sure we meet this principle?

### The suggested Do's and Don'ts

*You should consider you design your digital services to be accessible, barrier-free, and easy to use. This principle is informed by what our participants, including people in racialised communities, recommend as the Do's and Don'ts for developers and service designers.*

## EASY TO USE / NAVIGATE

### DO'S

- > make it simple
- > provide support for those who cannot complete forms online and offer the choice of online or paper forms
- > have a usable design (which addresses efficiency, effectiveness and user satisfaction)
- > limit the amount of scrolling necessary to find the most important options or information
- > design for mobile first
- > test your service with communities and address the feedback

### DONT'S

- > offer one 'fixed' way to engage (i.e. at certain times, online only)
- > hide information and create web pages where it takes several 'click' throughs to get to what the individual/user wants/needs to know
- > have multiple platforms for one service (e.g. health)

## ACCESSIBILITY

### DO'S

- > test for accessibility and work with reputable commissioning services who understand the diverse needs of users
- > provide easy reads, explainer videos and captions
- > design with the most disadvantaged users in the mind

### DONT'S

- > write in English asking people if they 'want this in another language' as they may not be able to read it to begin with
- > fill pages with black-on-white text

## PLAIN AND CLEAR COMMUNICATION

### DO'S

- > use plain language
- > offer multiple language options
- > use pictures, videos, emojis and visual elements to communicate where appropriate
- > provide options to communicate in the users preferred method (e.g. email, telephone)
- > make short and simple forms which are jargon free
- > offer explanations of key terms
- > provide guided voice-overs where possible

### DONT'S

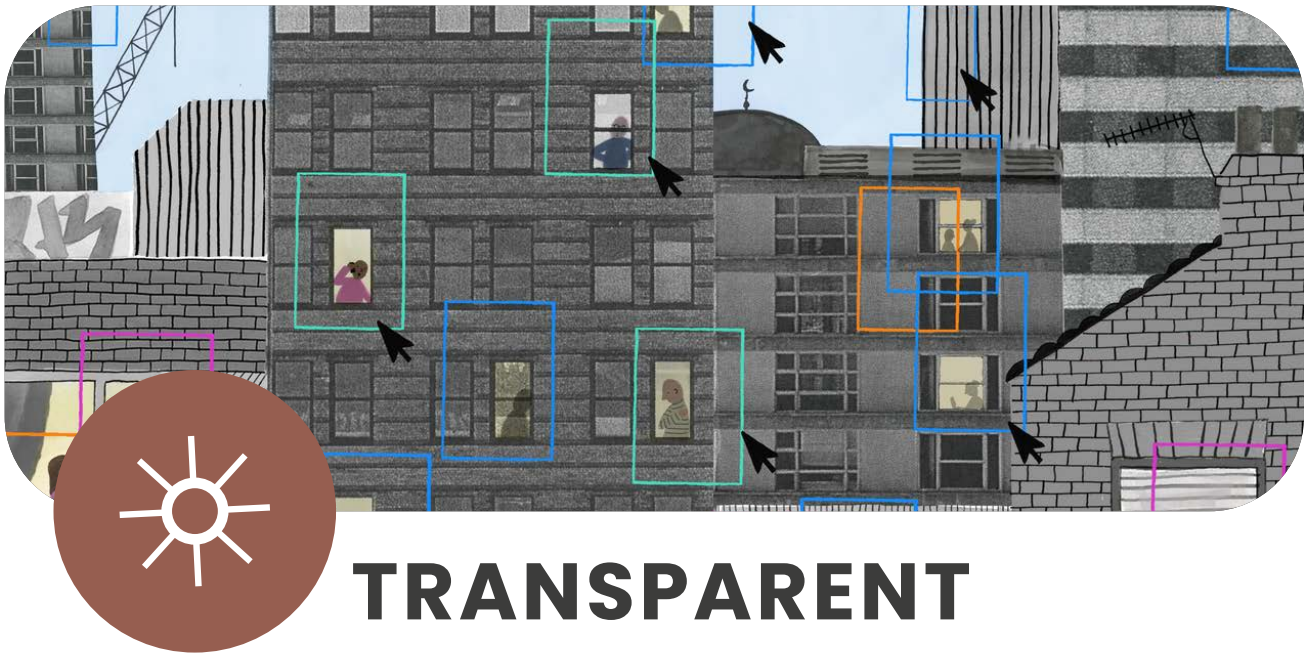
- > use jargon, difficult language or technical terms
- > be repetitive
- > provide unnecessary or complex options
- > construct long sentences
- > use ambiguous words or terms

## Accessible and easy to use digital services

Some examples of digital services that our participants found accessible and easy to use featured the following:

- > Live interpretation (in-person/ phone)
- > Easy to read forms in a range of languages
- > Being offered specific support options for disability needs (e.g. screen reader)
- > The availability of clearly displayed 'help' options from the outset
- > Translation options and audio options to hear the information, e.g. Text-to-speech options (such as some online banks)
- > The ability to submit voice notes for on-going communication about cases
- > BSL interpretation
- > Colour contrast
- > Easy to get past cookie banners without having to de-select numerous options
- > Include visual aids, such as signs and images
- > Large fonts and conciseness
- > Shorter forms
- > Information about how much time completing an online form will/ should take, with options to save progress and return





# TRANSPARENT

*In developing a fair and trustworthy digital service, transparency is a key principle that ensures there is accountability and services work in the interests of users and above all, mitigate potential individual or group-based harms.*

## What do we mean by 'transparent'?

A transparent service can demonstrate honesty and clarity. It avoids overloading users with technical explanations but is clear in its communication with users about processes, risks and uncertainties that relate to an increased online presence through the use of the digital services. It means users understand why the service is asking for certain pieces of information (e.g. ethnicity, religion), the terms and conditions (i.e. 'the small print') of the service, and are aware of issues that could affect them and know what they can do to take action if something is not right or they experience differential treatment.

A transparent service communicates and is upfront about how the service is using people's data to make decisions. It means

a service is clear about the way service operates, who it might share data with, how it uses data about individuals or 'groups', are accountable for their actions and can appropriately justify why a specific action, decision or offer has been made. It accounts for any direct or indirect discrimination through proxies that disadvantage minoritised ethnic groups, which may arise from how services are using data and AI. There should be transparency and responsible disclosure around AI systems to ensure that people understand AI-based outcomes and can challenge them.



## Why is this important?

If you consider transparency in all aspects of the design of the digital services, then you are well-placed to ensure your services are fair, protect privacy and the rights of individuals and/or groups. You need to consider this principle if you want

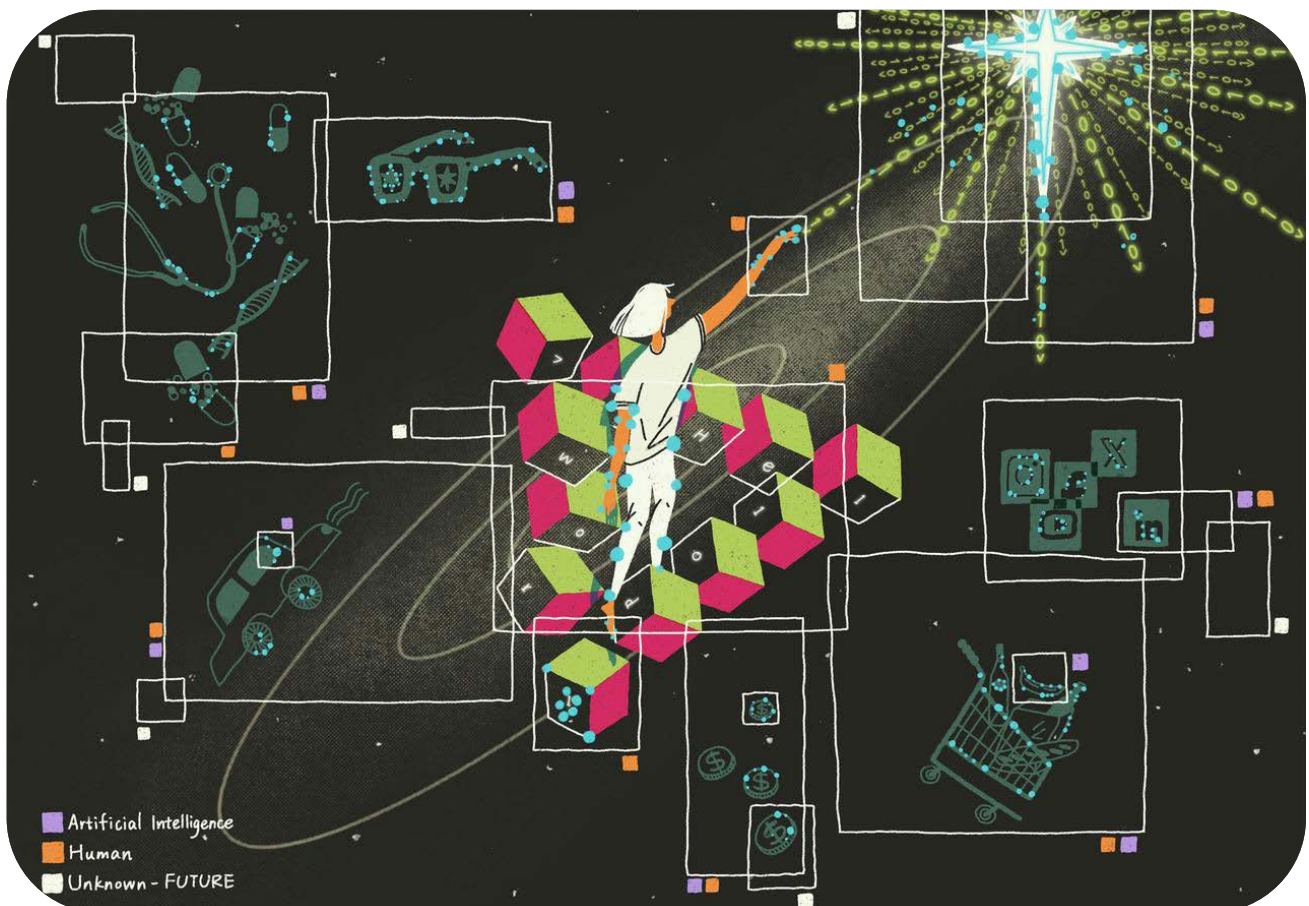
to build trust across a diversity of users and motivate users to use your digital service.

## How can we make sure we meet this principle?

### The suggested Do's and Don'ts

- > Do consider how you can develop mechanisms for involving a range of citizens and those who experience greater challenges, in the governance of the digital service, particularly where automation and AI systems are being used.
- > Do allow people to easily request to their own data
- > Do provide a clearer means to hold services to account and make it known how to do so
- > Do allow people to easily file complaints and track progress on actions taken on these complaints.
- > Do explain how and why decisions are being made
- > Do have clear 'house rules' for all service-based staff to follow to ensure consistency
- > Do monitor, evaluate and address any disparities across different groups
- > Do be honest about internal practices and processes
- > Do inform people about the different options available to them (e.g. discounted rates)
- > Do list any risks upfront
- > Do use language that is easier to understand (relates to the principle of accessibility)
- > Do have equitable processes (e.g. response time goals), stick to them and have clear policies to support this
- > Do create leaflets (or similar) giving detailed information regarding data processes and how a person's information will be used

- > Don't design complex processes whereby some people can better navigate it over others, as this may deepen inequalities
- > Don't hide or make it difficult to find, official complaint forms
- > Don't penalise users by forcing them to stay in contracts when better rates and offers exist for newer customers/users
- > Don't make available choices unclear or selective
- > Don't be purposefully vague, mislead, or downplay the risks from failings (e.g. data breaches, incidents of hacking)
- > Don't hide anything from the person using the service
- > Don't mislead over tariffs/rent costs etc







## PRIVATE & SECURE

*Protecting the privacy of users should be central to designing and developing a digital service that users can trust and have confidence in, while also ensuring there is fairer decision making and parity in outcomes, particularly for negatively impacted groups – in this case adversely racialised groups.*

## What do we mean by ‘private and secure’?

‘Privacy and security’ means a service has clear processes in place that keeps an individual’s information private, confined to specific purposes, and safe from harm. This also applies to information on ‘group’ characteristics (e.g. ethnicity, income, postcodes). Information should be shared only where there is direct benefit to users (e.g. multi-disciplinary care), and must not be shared with third parties for profit, data mining or where it may place a person’s safety in jeopardy. Users’ personal information should be handled with confidentiality by default. Internal processes should be in place to ensure services have a user’s **informed consent**

and permission to share which types of data about them and to whom. This will mean services should be more active in communicating privacy issues and taking steps to guide users through privacy settings.

Security relates to a user’s confidence in the digital service and that it is suitably protected from malicious actors or intent. Digital services should be authentic in its presentation to users, and responsive to the threats of any data attacks through proactive monitoring, updating existing security software, and investing in improved security infrastructures.

## Why is this important?

Privacy and security were key concerns expressed by adversely racialised people across this research. The principle provides a framework which recognises the digital dignity and informed consent of individuals. It places responsibility on services for good governance and

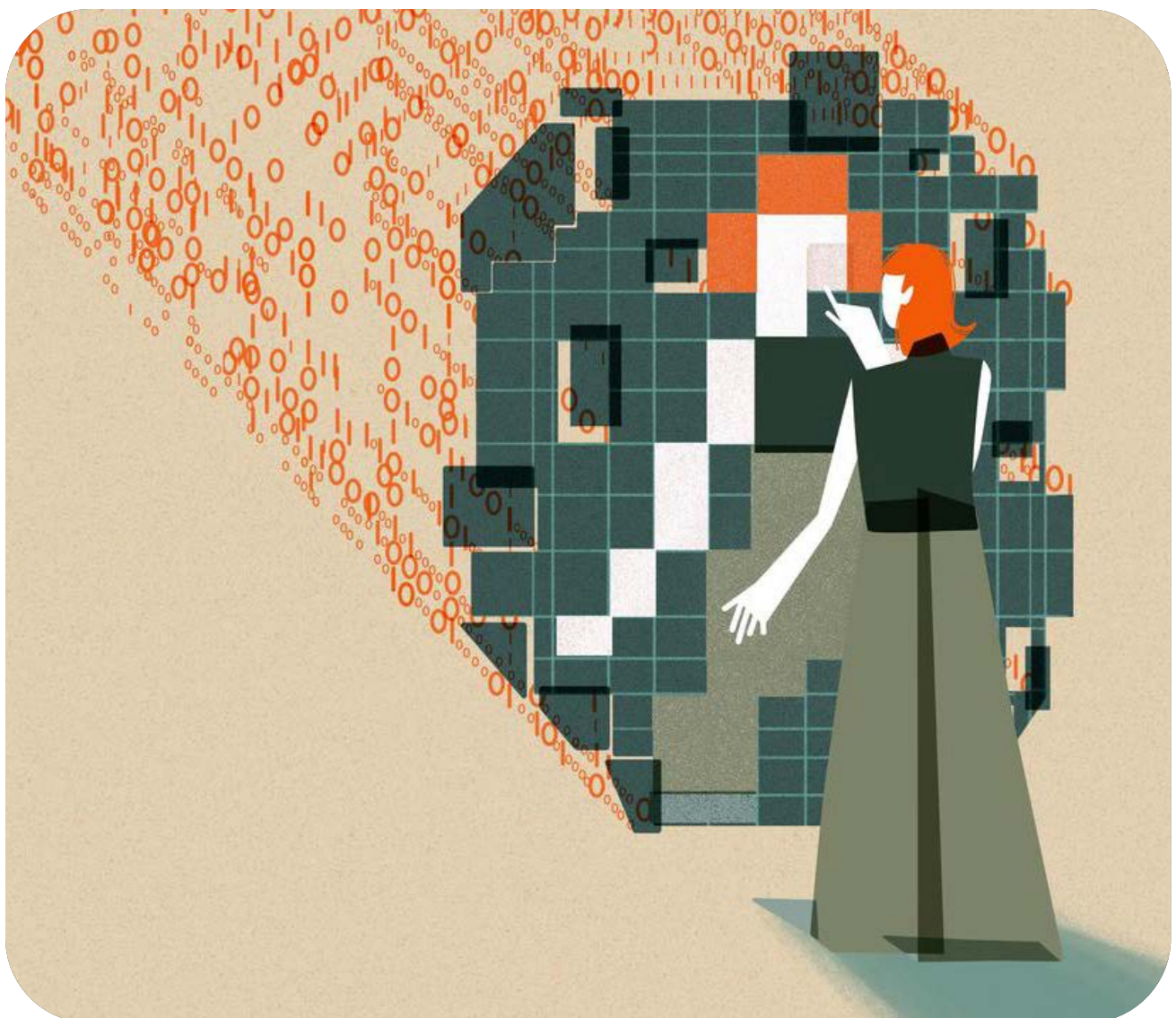
mitigating the risks of direct or indirect discrimination through group-level targeting. If you consider privacy and security in all aspects of the design of digital service, then you are well-placed to motivate people trust or want to engage with your digital service.

## How can we make sure we meet this principle?

### The suggested Do's and Don'ts

- > Do keep information secure from malicious actors and unauthorised use at all times
- > Do have clear access and control policies on who can access personal data within the service
- > Do ensure that third-party services, if used, also comply with the same privacy and safety measures and standards.
- > Do not gatekeep access to information, by requiring people to register for the digital service first
- > Do have clear policies which protect the security of services from unwarranted access to data
- > Do ensure people are informed of their rights under General Data Protection and Regulation (GDPR) such as the right to access, the right to be forgotten and the right to rectification
- > Do make it easier and more known about the 'right to be forgotten'
- > Do inform users about what action they can take if they feel privacy, security and data protection has been compromised
- > Do have an easier option to reject all cookies and tracking
- > Do operate under a default 'opt-out' scheme for people where possible
- > Do inform people about retention periods and do not keep data longer than necessary
- > Do provide clear information on how data is used and explain it in simple language
- > Do protect individuals/service users from penalisation based

- on their immigration status by not sharing their information with others where there is a risk to their safety
- > Do offer the choice for personal data to be deleted after an interaction
  - > Do check for negative implications from data use
  - > Do keep people safe from fraud
  - > Do teach people how to know how to check a website for credibility
  - > Do undertake an Equality Impact Assessment with different users in mind
  - > Do keep things consistent and familiar for users
  - > Don't sell and/or share data about users without informed permission
  - > Don't sell personal information to third parties for profit
  - > Don't collect information that is not needed in the first place





## TRUSTWORTHY

*You should ensure users feel your overall service is fair and trustworthy, so the digital service you subsequently offer can be trusted across a racially and ethnically diverse population.*

### What do we mean by 'trustworthy'?

The service does not increase the risk of potential harm, bias and distress by operating through a digital model. Users are more likely to trust services that are designed around their needs and priorities. A trustworthy service also safeguards a user's personal information, does not 'over-ask' for information, keeps user data secure and private.

The service does not make unfair decisions based on 'group' characteristics (such as ethnicity) or proxies (such as credit information or postcodes, as discussed earlier). It means personal information is not used to inappropriately target or effect access to a service or its outcomes. A service worthy of trust is transparent about how and why it collects data, how it uses and maintains it, and is governed by clear policies. It

communicates this in an accessible way to service users.

Develop your digital service so that its purpose and benefits for users are clear. The main driver for your digital service should not be for the purpose of 'cutting costs' as potential risks and harms to people – particularly those who are already most negatively impacted through digital systems such as minoritised ethnic people – is often more costly and damaging to trust in the longer term. AI systems must function in a robust, secure and safe way throughout their life cycles. Potential risks should be continually assessed and managed through auditing and impact assessments.<sup>8</sup>

8  
Box

Ada Lovelace Institute (2020) [Examining the Black](#)



## WHY IS THIS IMPORTANT?

It is important to have clear actions and policies with a firm legal basis that safeguard against unjust data use and decision making – whether direct or indirectly.

If you consider the importance of trust in all aspects of the design of digital services, then you are well-placed to ensure that you are gathering informed consent from users. It also shows that you are acknowledging disparities in user experiences and are better placed

to address historical issues of racism, socioeconomic inequality, prejudice and bias in society and how services may have acted and made decisions in the past.

The principle is, therefore, something you need to consider to address historic, social and economic disparities and differences in lived experience across sections of society in the UK. Greater trust can improve the overall confidence people have in the service to act in their interests.

## HOW CAN WE MAKE SURE WE MEET THIS PRINCIPLE?

### The suggested Do's and Don'ts

- > Do uphold data minimisation unless the benefits outweigh any risk of harms
- > Do ensure transparency about any third-party services which your digital services relies on
- > Do monitor changes in the terms and conditions of the third-party services (if your service uses any) and communicate to your users if any such changes affect them
- > Do invest in good security infrastructures or PETs from reputable developers
- > Do ensure your procurement practices are transparent
- > Do ensure there is transparency around the use of information
- > Do communicate any changes to terms of service in an accessible, jargon-free way, with the implications and any risks to users, clearly explained
- > Don't collect more information from users than needed
- > Don't disclose or sell information/ data to third parties without my knowledge or consent

- > Don't charge me different rates depending on what 'group' labels you have assigned to me
- > Don't include and 'flag' people on databases which have the potential to impact livelihoods, without their knowledge and the right to challenge

## FURTHER READING BEYOND THIS CODE:

- > Ada Lovelace Institute (2021) *Participatory data stewardship: A framework for involving people in the use of data.*
- > Benjamin, R. (2019) *Race after technology.*
- > Duke, T. (2023) *Building responsible AI algorithms.*
- > Favaretto, M., Clercq, E. D., & Elger, B. S. (2019) *Big data and discrimination: Perils, promises and solutions.*
- > Information Commissioners Office (ICO) *What about fairness, bias and discrimination?*
- > Open Data Institute (2024) *Building a better future with data and AI.*
- > Quyoum, A. and Wong, M. (2024) *Valuing lived experience and co-design solutions to counter racial inequality in data and algorithmic systems in UK's digital services.*
- > Race Equality Foundation (2023) *Report: racism is the root cause of ethnic inequalities.*
- > The Alan Turing Institute (2023) *Tracking experiences of online harms and attitudes towards online safety interventions.*
- > The Scottish Council for Voluntary Organisations (SCVO) *Making digital inclusion everyone's responsibility: a roadmap for Scotland, November 2023.*

