

Consultation Response

Improving access to electronic communications services for disabled people (Ofcom) 20 February 2013

About us

Action on Hearing Loss is the new name for RNID. We're the charity working for a world where hearing loss doesn't limit or label people, where tinnitus is silenced – and where people value and look after their hearing.

Our response will focus on key issues that relate to people with hearing loss. Throughout this response we use the term 'people with hearing loss' to refer to people with all levels of hearing loss, including people who are profoundly deaf. We are happy for the details of this response to be made public.

Comments

Action on Hearing Loss welcomes the opportunity to comment on Ofcom's consultation regarding improving access to electronic communication services for disabled people.

Bills and contracts in accessible formats

We support the requirement that all phone and broadband providers should have to provide bills and contracts in accessible formats when required. We do however believe that this requirement is already covered by the Equality Act.

For some sign language users, English may not be their first language and therefore they would benefit from having the information interpreted into sign language in person (through an interpreter), through a video relay telephone call, or a video with BSL interpretation of key information. Use of plain English in documents will also help to ensure that information is clear to a greater number of people. This will benefit others, as billing and contracts can be very complex for everyone to understand.

It is also important that companies provide a wide range of contact methods so that it is easy for an individual with hearing loss to get in touch using the method they feel most comfortable with. This could include textphone, email, SMS or live chat.

Extending priority fault repair to include broadband

We agree that priority fault repair should be extended to broadband. People with hearing loss may use their internet connection as an alternative to a voice telephone to communicate with services, employers and other organisations. This means that broadband access is important.

Sign language users may use video relay services and video interpreting services to enable them to communicate with people who do not use sign language. According to the 2011 Census there are 21,971 people who use sign language in England and Wales¹. However, we believe this is likely to be an underestimate as there was not an accessible version of the census questionnaire.

Safeguard scheme for disabled users: third party bill management

We believe that some people with hearing loss may benefit from being able to nominate a third party to manage their bills. However, we would want to ensure that this was not used as an excuse by the companies to then fail to provide an accessible service. This option should only be used by those people who want to, not because they are unable to access the service in any other way.

People with hearing loss may have additional impairments which may make it difficult for them to manage their own bills. In this case it is important that they are able to easily nominate another person to support them with this. We would recommend one particular department within each organisation to manage this. If an individual has to make numerous calls or emails to find out information, this will prevent them from signing up. The service therefore needs to be easily accessible.

¹ The statistics for Scotland and Northern Ireland have not yet been

At Action on Hearing Loss we provide both care and support services for people with hearing loss and additional disabilities. For some people who do not have the capacity to understand and manage their own finances, they may have someone appointed legally who has power of attorney.

Sometimes the people we support may just need prompting or supervision with their bills but may make all the important decisions themselves. We encourage people to take as much responsibility for their bills as they can, to increase independence and support them to learn activities of daily living. We therefore agree that third party bill management would benefit some people with hearing loss. If a named person is nominated to help a person with their bills, then it may go some way to minimising the risk of financial abuse. It is important however, that the nominated person can be changed easily when needed, for example due to staff turnover.

Safeguard scheme for disabled users: third party fault notification

As above, we agree that all disabled users should be able to access the safeguard scheme for third party fault notification. Depending upon the fault, a person with hearing loss may not be able to notify personally due to problems in communicating. However, some of these problems can be minimised by ensuring that there are a range of contact methods for people to use such as textphone, SMS and email.

A duty on Communications Providers to regularly inform disabled subscribers of details of products and services suitable for them

We agree that it is important for communication providers to keep people with hearing loss informed of products and services available. Many people are not aware that they are eligible for certain services, or may not see themselves as disabled and therefore would not actively investigate options. It is therefore vital that this information is provided to all people so that they are able to choose if and when they want to access these services.

If the communication provider uses embedded videos on their website, it is important that subtitled and signed versions are available for people with hearing loss.

This should include clear information about which phones and mobile phones are accessible for people with hearing loss, including signposting to the Global Accessibility Reporting Initiative (Gari) database. We would also recommend organisations publish the M and T ratings for their mobile phones, along with an explanation of what they mean or signposting to where this information is available. This would help people to make decisions about which phones would work best with their hearing aid.

Conclusion

Overall we are supportive of Ofcom's proposals to improve access to electronic communication services for disabled people. People with hearing loss will be able to benefit from these proposals and we would be happy to have further discussions with Ofcom on this issue.

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