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Representing:

Organisation

Organisation (if applicable):

British Society of Rehabilitation Medicine-Special Interest Group in Rehabilitation Medicine

Email:

What additional details do you want to keep confidential?:

No

If you want part of your response kept confidential, which parts?:

no need to keep anything confidential

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

The British Society of Rehabilitation Medicine welcomes the opportunity to participate in the Ofcom Consultation. The document was informative and has useful information regarding relevant sections of EU legislation such as the citizen rights directive. However the focus of this consultation is rather specific I.e the proposed changes to general condition 15. However if equivalence of access is the goal there are other barriers that must be overcome by the disabled user. Most of the severely disabled people are not able to use even an adapted telephone or computer. An overview of the electronic equipment needed by disabled people

is available in the BSRM document titled Electronic Assistive Technology (EAT).

There are some areas within the UK where severely disabled users are provided with state of the art EAT to allow them to use their telephones or access their computers. EAT is crucial in ensuring that these disabled people are able to live in their own homes and have a degree of independence. However access to such services is very variable. In some areas of the UK, there are 100-120/ 1,000,000 users of such technologies where EAT provider services are well managed. There are also pockets within the country where there are no EAT service providers and people with severe physical disabilities due to a variety of conditions are not able to use a telephone or access a computer. EAT is a very vital link without which such discussions on formats for bills and contracts can become irrelevant. Fortunately it is anticipated that from April 2013 the National Commissioning board will be responsible for funding these EAT provider services and we can look forward to the end of a post code lottery for EAT provision

It is also important to recognise that there are several thousands of severely disabled people who reside in nursing homes and sheltered accommodations. In the past some PCT's have refused provision of EAT for these people on the grounds that the care staff should be able to meet their communication needs and ability to control their environment. Several of these residents simply do not have access to a landline, mobile or broadband.

Response to Bills and contracts in accessible formats::

The focus and in depth attention on ensuring that disabled users are able to see their bills/contract is a little misplaced. There are several areas within the UK where patients with severe physical disabilities and mild to moderate cognitive disabilities do not have the ability to control their own physical environment. Electronic Assistive Technology-EAT (please see BSRM report on Electronic Assistive Technology) including Environmental controls and Computer access is a crucial link in ensuring that people with severe disabilities are able to use their telephones to call for help in an emergency. I do not have any evidence to say that disabled users have been perturbed by non availability of their bills and contracts in accessible formats. Most providers urge users to adopt paperless billing. Ensuring disabled users have computer and internet access is probably more important.

The issue of defining the disabled users is complex. Do we address physical, cognitive and communicative deficits? Would it be a self reported option in which the users ticks a box when signing the contract.

Response to Extending priority fault repair to include broadband::

The proposal of extending priority fault repair to include broadband is welcomed. This particularly important for those with physical disabilities. Shopping online can become a necessity rather a luxury.

Response to Safeguard scheme for disabled users: third party bill management::

nothing to add

Response to Safeguard scheme for disabled users: third party fault notification ::

nothing to add

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

nothing to add