

## Improving access to electronic communications services for disabled people- call for inputs

Response from the Royal National Institute of Blind People

### Overview

RNIB is responding to this call for inputs because blind and partially sighted people need and highly value electronic communications services.

2.4 of the consultation document suggests that disabled people may be “*more reliant on certain services*”, and this is certainly often the case for blind and partially sighted people.

For a variety of reasons, a blind or partially sighted person will often have greater difficulty than others in physically getting to goods and services, and in accessing information, not least when it is online. RNIB’s 2012 report “Tackling digital exclusion - Older blind and partially sighted people and the internet”, supported by BT, explains some of these barriers.

[http://www.rnib.org.uk/aboutus/Research/reports/inclusive/Pages/digital\\_exclusion.aspx](http://www.rnib.org.uk/aboutus/Research/reports/inclusive/Pages/digital_exclusion.aspx)

We are doing what we can to reduce these barriers. At the time of writing, for instance, RNIB’s home page carries series of videos to help blind and partially sighted people “get interested in technology”.

[http://www.rnib.org.uk/livingwithsightloss/computersphones/Pages/technology\\_videos.aspx](http://www.rnib.org.uk/livingwithsightloss/computersphones/Pages/technology_videos.aspx)

What is clear is that communication services-where accessible- are a vital means of instead bringing goods, information and services to blind

and partially sighted people. The examples of shopping and banking in 2.4 are indeed very relevant to blind and partially sighted users.<sup>1</sup>

Furthermore, with ever-increasing convergence of digital services, broadband can also deliver television and a host of other interactive services which blind and partially sighted might be more inclined to use than a standard computer interface.

The requirements in General Condition 15 have proven very helpful to blind and partially sighted users of telecoms services. For instance, to use telecoms services it is essential that a blind or partially sighted person have access to bills in accessible formats such as Braille, audio or large print, and that they be able to read their contract so as to benefit from telecoms services on an equitable basis with others. General Condition 15 facilitates this.

RNIB has for some time now believed that the level of protection currently provided in General Condition 15 for blind and partially sighted users of traditional telephone services should also be afforded to disabled users of broadband. Whilst an extension of the sort of provisions in General Condition 15 would not remove all the barriers mentioned above, it would underpin access to this vital facility for blind and partially sighted people just as it currently does for telecoms services. As the “call for input” document says in 2.10:

*“The rapid emergence of digital technology has changed the way that communications services work for consumers. It has also changed the way in which businesses and public services communicate with their customers e.g. email, online billing.”*

The document goes on to say in 2.21 that

*“Total home internet access has continued to increase and stood at 80% of UK homes as of Q1 2012”*

RNIB concurs with these observations.

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1 "Half of people with sight loss reported needing assistance to shop for everyday necessities." (McManus and Lord, 2012)

So, in short, RNIB supports the changes Ofcom is proposing in the call for input. We believe in particular that a combination of three factors makes the case for these changes compelling:

- Blind and partially sighted users' need to access communications services in order to be fully included in society
- The shift of provision from offline to online, these days, to deliver a very wide range of goods, services and information. Indeed the internet is increasingly the only, or at least the quickest and often cheapest, means to access these services<sup>2</sup>
- The high and increasing level of home internet access, whereby the internet is seen as essential and almost as important as access to a major utility such as electricity

Below we answer those questions in the call for inputs which we deem most relevant to the needs of blind and partially sighted people.

## **Bills and contracts in accessible formats**

### **What do communications providers currently do in order to comply with General Condition 15.9?**

RNIB has not researched this matter, and so cannot provide a detailed answer. Unfortunately, we therefore mostly hear of complaints when a provider has failed to supply accessible formats; something which occasionally happens, rather than of the many instances when the Condition is most likely being met.

For instance, in August 2011, a customer contacted us to complain that his mobile provider failed to provide him with bills in Braille, his accessible format. He was being provided with no documentation/bills at all. We pursued a complaint for him, and he was finally provided with bills in February 2012 but these were in small print. We continued to contest the matter with the mobile provider who then provided him with his first bill in Braille in late February 2012. The customer then received

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<sup>2</sup> The Government's moves to provide "digital by default" services underlines the importance of accessible broadband access: <http://www.cabinetoffice.gov.uk/news/digital-default-proposed-government-services>

in March, all the previous bills from the last year in Braille format. Since then has received regular Braille bills.

***(ii) Do fixed and mobile broadband service providers currently offer bills and contracts in accessible formats? If not, does this cause particular problems for disabled users?***

RNIB believes that they certainly should already provide this as it is required by the Equality Act 2010.

We are pleased to note that the four largest suppliers of broadband services do say on their websites that they supply accessible format information.<sup>3</sup> However, this information is not that easy to find on these websites. RNIB believes more should be done by communications service providers to make customers aware of the fact that they offer accessible formats. We also believe that providers should think carefully about the design of bills and contracts, both for disabled and non-disabled customers, so that, as well as being available in an accessible format, they are easy to understand.

***(iv) What evidence is there of the effect of disabled peoples' experience with regard to billing and contract formats on their access to relevant communications services?***

Clearly, if a blind or partially sighted customer cannot understand the contract terms, he or she might end up paying more, and if they cannot access a bill, they might miss paying it at all and risk running up penalty costs or having the service disconnected. We are pleased to see that the Ofcom "Call for Inputs" document acknowledges these dangers.

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<sup>3</sup> **BT retail:**

<http://www.bt.com/includingyou/help-support-alternative-media.html>

**Virgin**

<http://help.virginmedia.com/system/selfservice.controller>

**Talk Talk**

[http://help.talktalk.co.uk/app/answers/detail/a\\_id/1874/kw/DISABILITY](http://help.talktalk.co.uk/app/answers/detail/a_id/1874/kw/DISABILITY)

**Sky:**

<http://accessibility.sky.com/>

<https://accessibility.sky.com/sky-tv-help/alternative-formats>

***(vi) Which accessible formats should be expressly included in GC15.9?***

RNIB sees no reason to change the requirements from those used for fixed telephony. Audio, Braille and large print are vital. Many customers will be able to use accessible online bills and information on contracts. It is important that service providers ask disabled customers which format they require.

***(vii) For fixed and mobile telephony providers, how many disabled customers currently request bills and contracts to be provided in accessible formats?***

Around 360,000 people are registered blind or partially sighted in the UK. RNIB does not have statistics for how many of these people request bills and contracts in accessible formats.

## **Extending priority fault repair to include broadband**

***(i) Which groups of disabled people depend on a broadband connection in order to communicate?***

As we mentioned above, blind and partially sighted people are often more isolated and less able to get out and about than others. Back in 2006, a survey found that “nearly half of blind and partially sighted people feel ‘moderately’ or ‘completely’ cut off from people and things around them.” (Pey, Nzegwu and Dooley, 2006). Broadband connection certainly facilitates the inclusion of people into society, well as access to services, goods and information. It may be wrong to state simply that blind and partially sighted people “depend” on broadband to communicate, but like most people, they are increasingly using broadband and it is becoming ever more important in their lives.

***(ii) How large are these groups?***

Potentially this group covers everyone with a sight problem in the UK – some 360,000 people are registered as blind or partially sighted.

***(iii) In what ways do these groups depend on a fixed broadband service?***

Blind and partially sighted people use broadband to do many of the same things everyone else does, including accessing information, services,

shopping and entertainment. There is some evidence to suggest that it is often cheaper to shop online too.

Blind and partially sighted people are among the poorer members of society, and getting poorer still. This should not be compounded further by an inability to access the internet and benefit from cheaper deals online.<sup>4</sup>

Furthermore, government services are increasingly going online, in moves towards “digital by default”.<sup>5</sup> This again makes access to broadband that much more important for blind and partially sighted people, who like other disabled people often rely on government services more than most, for instance to understand and claim disability-related benefits.

***(viii) What are the financial and other benefits for disabled people associated with providing a priority repair service for faults with fixed broadband services?***

The importance of broadband access for blind and partially sighted people, as outlined in ii above, and elsewhere in this response, underlines the need to repair faults to the service rapidly so as to minimise the period during which they cannot reap the benefits of the service.

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

***(ii) What barriers (if any) do disabled people currently face when trying to purchase communications products and services and with what effects?***

For blind and partially sighted people, the main barriers are:

- Not knowing which services are likely to be accessible to them, and which are not, due to lack of information on the accessibility of those services

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<sup>4</sup> See for instance this Which? Survey from 2012. <http://www.which.co.uk/news/2012/10/which-survey-reveals-best-and-worst-online-shops-299726/>

<sup>5</sup> <http://digital.cabinetoffice.gov.uk/about/>

- A more general lack of information in accessible formats about available products and services

***(iv) What would be the qualitative and quantitative benefits of such a provision for disabled people?***

Logically, if potential or existing disabled customers are kept informed of the products and services suitable for them, then they will more likely become or remain customers. That should be a compelling reason for communications providers to give this information. Such provision could significantly improve the chances that blind and partially sighted people would have to get access to products they can use, and get those products at competitive rates. All of this would help blind and partially sighted people derive the benefits from these products and services which we have mentioned elsewhere in this response.

Looking at this from the service providers' side, if they ensure that their services are accessible and appropriate to disabled customers, the likelihood is that they will then incur less cost and spend less time dealing with complaints and queries about their services.

***(iv) Are there other organisations that could usefully play a role in providing disabled people with information on the products and services suitable for them? How might such organisations and fixed and mobile Communication Providers work together to ensure disabled people have access to this information?***

RNIB is certainly willing to help Communication Providers to understand how best to communicate with their blind and partially sighted customers.

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