

Title:

Forename:

Surname:

Representing:

Organisation

Organisation (if applicable):

Sense

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What additional details do you want to keep confidential?:

Keep name confidential

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

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

Sense welcomes the opportunity to respond to the call for inputs from Ofcom as part of its review of the services available to promote access to communication services for disabled people. For many people with dual sensory impairment reliable access to electronic communication is vital.

Sense

Sense is the leading national charity that supports and campaigns for children and adults who are deafblind. We provide expert advice and information as well as specialist services to deafblind people, their families, carers and the professionals who work with them. In addition, we support people who have sensory impairments with additional disabilities.

Deafblindness is a combination of both sight and hearing difficulties. The level of impairment varies from person to person and while one deafblind person may have mild hearing

impairment but severe visual impairment another deafblind person may be profoundly deaf and blind. The term deafblindness covers all combinations of hearing and sight impairment. People can be born deafblind, or become deafblind through illness, accident or in older age.

Response to Bills and contracts in accessible formats::

Communications providers routinely offer access to bills via text message alerts linked to website accounts. The accessibility of the websites varies greatly from provider to provider, while some offer an easy to navigate format and content, others do not. For people with dual sensory impairment it is essential that webpage format is uncluttered and clear to allow individuals that use partial residual sight to view the information and that it is well structured and tagged for those that use additional technology such as screen readers. Guidance and standards exist to assist in this area (e.g. WCAG) and the principles of inclusive design are important.

The bill and contract formats available must be compatible with technology such as screen readers. PDFs that have not been created with accessibility features (e.g. tagging) or documents that use content such as columns are often unreadable by these devices and means that part or all of information is not accessible. The consequence of this is that an individual who would prefer to manage their finances and services independently are forced to request assistance from a third party to read or re-format the information for them. Sense would welcome the opportunity to assist communications providers with user trials to ensure that formatting and accessibility of bills and contracts are tested with the equipment that dual sensory impaired people use today, so that deafblind people can receive bills and contracts in the manner of their choosing.

Changing the way in which bills and account information are delivered to the dual sensory impaired person needs to be managed effectively, contacting the consumer via their preferred method of communication and notifying them of changes prior to the change being implemented. For example one individual that used Braille format to receive her phone bills and manage these accounts was suddenly and without warning or explanation provided with printed text documents. On contacting the provider the individual was informed that they were no longer able to provide Braille and that large print, audio or the website were her only options. This person has no sight or hearing and her assistive technology is such that printed or audio material would not be usable, consequently she is forced to use a "reasonably accessible" website.

The information that is directly available from the service provider through their telephone based customer services, their company's marketing material and web based content that refers to alternative bill formats is often unclear and creates confusion about what is available to the deafblind consumer and at what cost. Several people spoken to in providing this response commented that they have not requested an alternative billing format from their provider, fearing additional charges. This is despite having difficulties in using the website to view their bill information and knowing that an alternative format may be significantly easier to use. Providers should be compelled to clearly state all available billing options alongside their charges (if any).

While the Communications providers do offer a range of accessible formats and are usually very obliging when these alternatives are requested the process that follows can be frustrating and with a long time scale attached. Dual sensory impaired people have commented that the

person they are talking with on the telephone is often aware that the company they work for does offer alternative formats however they are unable to process this request themselves and do not know who to pass the request on to. Once the request is following the correct company procedure it can take months to implement the change to the account.

Response to Extending priority fault repair to include broadband::

Access to reliable internet provision is essential to the majority of people with dual sensory impairment. It is relied upon for many daily necessities such as food shopping, communication of both professional and personal nature, managing finances and is often the main source for information. One person said "I wouldn't be without my internet connection as it's my first stop for all communication". As well as the implication a broadband fault may have on daily living and communication, the fault may also affect more critical needs such as linked emergency call systems.

When faults do occur for this consumer group it is imperative that the fault notification system and repair are easy to arrange and escalated as priority by communication providers. This is because many deafblind users are empowered by the use of their own personal technology and broadband service, which is set up to meet their individual needs with system settings, software and additional technology. Therefore using an alternative system located outside of the home, for example at a local library does not provide the accessibility and/or the technology that the individual needs and may be inaccessible in terms of location. If these services become unavailable a person may find themselves in a vulnerable situation because they will be isolated.

A person that is known to the service provider to have a dual sensory impairment should not have to pay a premium to ensure that broadband and mobile services repair is treated as priority. Complicated processes used by providers for a person to request priority repair due to their disability such as General Practitioner (GP) letters of endorsement and lengthy internal departmental processes should also be avoided.

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

The majority of deafblind people prefer to be independent, managing their own finances and personal affairs. Communication services support and enable this independence. It is when service providers neglect to ensure that information and processes are accessible to those with dual sensory impairment that some people are forced to use third party bill management.

A third party scheme may be beneficial to those who either do not have the ability or access to manage bill payment themselves or who would prefer for a third party to take on this responsibility on their behalf.

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

It is the responsibility of the communications provider to ensure that there is an effective system available to those with dual sensory impairment to report service faults. Using the telephone even with a mild hearing impairment can be a challenge but when the person also

has sight impairment and the call involves locating reference and account numbers, keying in such numbers on the telephone keypad within a particular time frame, hearing and understanding automated menu's and speaking with operatives who may have strong accents, speak too quickly or use very technical language it can result in an extremely unpleasant, frustrating and stressful experience for the deafblind customer. Modifications to service provision could include a designated telephone number for the dual sensory impaired person to call where disability aware staff answer the call and are able to knowledgeably provide a more tailored, customer focussed and appropriate service.

Individuals with dual sensory impairment may require alternative means of communicating with the provider when broadband and telephone services are not working. The use of SMS, web pages and online web chat that are fully accessible with both smart phones and their essential additional technology such as screen readers would enable the person to independently report and manage the problem effectively without the need for a third party.

While a safeguard scheme may be beneficial and a necessity for some it should be that communication providers aim to deliver a fully accessible service to enable the majority of those with sensory impairment to effectively and independently manage the services they choose to purchase.

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

The generic marketing mailings produced by communication providers rarely delivers useful information to dual sensory impaired customers who report that they sometimes feel pressurised to pay for services that are neither appropriate or wanted.

Relevant and important information, such as updates and changes to services often remain unknown to the deafblind customer either because they have not been notified in the correct format given their needs, or they have been unable to locate and/or access the information. The result of which can be very expensive for the end user, for example, one deafblind customer reported that she had not been made aware of changes that Vodafone had introduced to its European mobile phone service and following a period of travel in Europe returned home to a "huge bill".

Deafblind people want to be able to access up to date, clear and relevant information regarding electronic communication services. This information should allow the consumer to compare the services and products available on the market and thus make an informed decision, choosing to purchase the most appropriate and accessible service to meet their needs.