

Communications Consumer Panel and ACOD response to the Extra Costs Commission's consultation on its Interim Report on the extra costs faced by disabled people

The Communications Consumer Panel and the Advisory Committee for Older and Disabled People (ACOD) welcome the opportunity to contribute to this consultation on the extra costs faced by disabled people.

The Communications Consumer Panel is an independent panel set up under the Communications Act 2003 that works to protect and promote people's interests in the communications sector. The Panel carries out research, provides advice and encourages Ofcom, Government, the EU, industry and others to look at issues through the eyes of consumers, citizens and microbusinesses. The Panel pays particular attention to the needs of: more vulnerable people; older people and people with disabilities; the needs of people in rural and urban areas; people on low incomes; and micro businesses, which face many of the same issues as individual consumers.

The Panel has eight members who between them have experience in many different fields, including accessibility, consumer advocacy, dispute resolution, the telecoms, digital and content industries, access services, micro and small business, the third sector, social policy and market research. Members engage with stakeholders across the UK to help inform the advice that they give to Ofcom and to keep the interests of consumers, citizens and micro businesses on the agenda across the sector. We also engage with a range of other organisations working on behalf of these constituencies - including those representing older and disabled people.

There is also cross-membership between the Panel and Ofcom's Advisory Committee on Older and Disabled People. This means that Members, in their ACOD capacity, provide advice to Ofcom on issues relating to older and disabled people including portrayal of older and disabled people on television, radio and other content on services regulated by Ofcom as well as about issues concerning the postal sector.

The Extra Cost Commission's Interim Report

The Panel welcomes the Commission's Interim Report, particularly the evidence produced by Scope and others of the extra costs incurred by disabled people and their families, and the Commission's approach looking at how to reduce disabled people's outgoings.

The conclusions and recommendations reached by the Commission highlight issues that are particularly relevant to disabled people, but many are also relevant to all consumers. We also believe that these conclusions and recommendations are more widely relevant to a range of organisations beyond those providing communications services.

We will be responding on the following points:

- The Digital Divide getting and staying online, highlighting conclusions and recommendations from our report <u>'Bridging the Gap: Sustaining Online</u> <u>Engagement'</u>
- Customer service and redress including switching, quality of customer service and complaints (from our research '<u>Going round in circles? The consumer experience of</u> <u>dealing with problems with communications services</u>')
- 3. The needs of microbusinesses as both consumers and providers, drawing from the conclusions and recommendations of our research <u>*(Realising the potential: micro businesses' experiences of communications services'*</u>.
- 4. Availability of information and price comparison sites tailored to the needs of disabled consumers.

1. The Digital Divide - getting and staying online

The Panel welcomes the Commission's evidence supporting our belief that the internet is now a necessity; and yet, as the Commission's report states, 30% of disabled people have never used the internet, compared to 7% of the UK as a whole.

The key point here is that the best chance of driving down overall extra costs is to improve access to the best deals (be they financial products, discounts, special offers, etc). And the best chance of achieving that is by helping people get online, stay online and use digital services to help reduce their everyday costs. So in simple terms, and in response to the Commission's second question, one action might be to lobby stakeholders and Governments to invest more in digital engagement.

The Panel has previously highlighted the fact that an increasing number of commercial services are only available online - or delivered offline in a way that effectively penalises users, through higher costs or lower quality.

The report 'Valuing Digital Inclusion - Calculating the social value to individuals of going online'1, written by Eilís Lawlor for the BT Get IT Together Project (published in June 2014), quantifies the value of digital inclusion for a new user as an estimated £1,064 per annum. This clearly highlights the link between financial and digital inclusion.

The estimated benefit increases to £3,568 for a professional user. A professional user could be a disabled person of working age who is able to work remotely for an employer; or he or she could be the owner of a microbusiness (as mentioned later), who lives with a disability and is able to work remotely, perhaps promoting their products and services online.

The Commission's report highlights the additional transport costs to disabled people for travelling, and these costs include, for many disabled people who are able to work, the cost of getting to work.

¹http://www.btplc.com/Betterfuture/ConnectedSociety/Creatingpossibilities/Valueofdigitalinclusion/Valuing-Digital-Inclusion.pdf

Recent statistics from the Office for National Statistics (ONS)2 show that working from home is more common among individuals who are older. For all adults - aged 16 and over, in work - 13.9% were home workers in January to March 2014 and for those workers aged 65 and over, 38.3% worked from home. Comparable statistics on the number of home workers who have a disability are lacking, but we would argue that communications services could play a significant role in enabling people to work from home more, thus reducing associated costs.

Bridging the Gap

In 2010, the Panel developed a '<u>Consumer Framework for Digital Participation</u>³ to help Governments and others increase the number of people using the internet. Against this background, the Panel commissioned further research in 2012 to consolidate stakeholders' experiences and learning in supporting online participation among people who are less digitally engaged, and to gather information about supporting people to take the next steps online. Drawing on this research, our report '<u>Bridging the Gap: Sustaining Online</u> <u>Engagement</u>⁴ details the Panel's clear recommendations to Governments and others.

Our report highlighted that, in addition to access, people's breadth of use needed to be supported and measured. The Panel's recommendations are included at Annex 1.

Since Bridging the Gap was published, the Panel has monitored the evidence available from Ofcom, the ONS and other sources, including Ofcom's Consumer Experience and Digital Day Report,⁵ published in January 2015 and we support Ofcom's further research into the needs of disabled consumers and citizens.

We also believe that locally based agencies have a key role to play – particularly libraries - the Panel has provided advice to the Department for Culture, Media and Sport and the Department for Communities⁶, and the Local Government Scottish Library and Information Council⁷. Libraries provide a trusted and inclusive environment that should be used to support ongoing learning in a sociable, unintimidating way.

We would also encourage much greater availability of free public Wi-Fi. One example of the way this has been put into action to help people on low incomes is highlighted in the Government's Digital Inclusion Strategy, in a case study on the Peabody Housing Association⁸

Information in 'Plain English' and on-going support can be a necessity for more vulnerable users, to ensure that they are able to choose affordable, up-to-date equipment which suits their needs; to help them continue to engage with the technology once they have it; and to help them protect the privacy of their data and prevent them from falling foul of scams.

 ² http://www.ons.gov.uk/ons/rel/Imac/characteristics-of-home-workers/2014/rpt-home-workers.html
³ http://www.communicationsconsumerpanel.org.uk/smartweb/digital-participation/the-

consumerframework-for-digital-participation

⁴ http://www.communicationsconsumerpanel.org.uk/bridging-the-gap-sustaining-online-engagement/bridging-the-gap-sustaining-online-engagement-2

⁵ http://stakeholders.ofcom.org.uk/market-data-research/market-data/consumer-experience-reports/consumer-experience-14/

⁶ http://www.communicationsconsumerpanel.org.uk/downloads/dcms--dclg-libraries-march-2014.pdf

⁷ http://www.communicationsconsumerpanel.org.uk/downloads/comments-on-the-development-of-anational-strategy-for-scotlands-public-libraries.pdf.

⁸ https://www.gov.uk/government/publications/government-digital-inclusion-strategy/government-digital-inclusion-strategy

The Panel believes that providing better, clearer information and advice will benefit all internet users, but it should be designed with the practical considerations of disabled consumers in mind.

In terms of infrastructure, we have welcomed the recent agreement between the Government and mobile network operators, to improve coverage (albeit outdoor coverage) and the Government's recent commitment to a universal service obligation of 5Mbps - although we would suggest that 10Mbps is a more appropriate minimum level.

However, it is important not to simply focus on speed, but to make a conscious and determined effort to ensure that all internet users are able to undertake a wide range of activities. Some examples of available support are included at Annex 4.

Accessible website design - making sure disabled consumers have equal access to websites

The Government Digital Service (GDS) has used 'personas' to test website design and functionality (https://assisteddigital.blog.gov.uk/2014/08/28/assisted-digital-user-personas/) and we would encourage businesses to do the same. The use of personas means that an e-commerce site can be designed with the accessibility needs of a range of consumers in mind. The GDS recommends that usability testing, especially for mobile devices, should occur every six months, due to the pace at which new devices and software are reaching the market. Sources of help for businesses, in developing accessible websites are included at Annex 4.

It is encouraging that both the Money Advice Service

(https://www.moneyadviceservice.org.uk/en) and Money Saving Expert (http://www.moneysavingexpert.com/site/access) allow their users (the general public) to report accessibility issues.

Other channels of communication - reaching and including disabled people who are not online

Until such time as all disabled consumers are able to use the internet, there needs to be other ways of letting people know what they can do to keep costs down. Television is an affordable communication channel to most of the population. Broadcasters are obliged to provide a service that is accessible to all.

Television Access Services

Subtitling, sign language, speaking electronic programme guides and audio description, known collectively as 'television access services', help people with hearing or visual impairments to understand and enjoy television. Relevant targets are set out in the Communications Act. In 2014, 73 channels were required to provide access services on their programming.

We have recently submitted our views on the subjects of speaking electronic programme guides ⁹and signing arrangements¹⁰ to Ofcom.

Connecting older people who do not have access to the internet and may live alone or feel socially isolated - to their local community - is one of the challenges being tackled by Age Action Alliance. This involves collaboration between public, private and third sector

 ⁹ http://www.communicationsconsumerpanel.org.uk/downloads/speaking-tv-programme-guides-080914.pdf
¹⁰ http://www.communicationsconsumerpanel.org.uk/downloads/signing-relevant-channels.pdf

bodies, to combine efforts and sometimes costs to represent the range of needs of a diverse age range, achieving practical outcomes.

2. Customer Service and Redress

Switching

If consumers are more aware of the potential benefits of switching and can switch between providers quickly and easily, consumers will benefit from enhanced competition and innovation in communications markets. However, consumers will not switch provider if they fear a loss of service or a complicated switching process, with no guarantee of improvement at the end. Consumers also need to be able to make an informed decision about their switch, including any potential penalties for early termination of their existing contract. The Panel has recently responded to Ofcom's consultations on switching^{11 12} in support of making the process easier for consumers, through the gaining provider led system.

We are in agreement with the Commission's recommendation (number 4) that disability and consumer organisations should signpost disabled people and their families to appropriate switching schemes for services such as energy and insurance, and we recommend that communications services are added to this list.

As well as while switching providers, consumers need protection when a service is interrupted for a reason beyond their control, such as when moving house. This may cause them to need to switch provider, or it may mean going through more complicated processes, at a time where the cost of moving poses an additional cost of its own. This may be more likely to cause problems for people on lower incomes, who may be in rented accommodation and may need to move house more often. It is vital that disabled consumers have accessible ways to contact their provider in times of need and that providers make it possible for a nominated person to act on their behalf, where applicable.

Quality of customer service

The Panel has urged the communications industry to raise the level of customer service it offers, based on the findings of our research into the consumer experience of dealing with problems with communications services.

Following a review of both existing quantitative studies and new independent qualitative research, the Panel published its report <u>Going round in circles? The consumer experience</u> of dealing with problems with communications services'¹³.

The Panel commissioned independent qualitative research from Ipsos MORI with participants across the UK who had experienced a problem with their communications service. The Panel wanted to understand why some people who had cause to contact their suppliers about an issue did not do so, as well as explore the experiences of those who had contacted their supplier to try and resolve an issue.

Key findings from the qualitative research and quantitative review include:

¹¹ http://www.communicationsconsumerpanel.org.uk/downloads/switching-final-sept-2014.pdf

¹² http://www.communicationsconsumerpanel.org.uk/downloads/ofcomkcom-switching-final.pdf

¹³ http://www.communicationsconsumerpanel.org.uk/going-round-in-circles/going-round-in-circles

- Some older consumers and some consumers with a disability seemed to be at a particular disadvantage in their dealings with providers;
- For a variety of reasons, some people who don't contact their provider are suffering in silence and 'getting by' on a sub-standard service;
- For some who did contact their provider, their initial frustration was exacerbated by a negative contact experience;
- The loss of time and money by consumers trying to get a problem addressed and the emotional perseverance required are rarely acknowledged by communications providers; and
- Escalation of problems frequently appears to be ineffective and communications providers seem to be poor at telling customers about Alternative Dispute Resolution (ADR).

Complaints and redress

We have previously recommended that communications providers should review and strengthen their escalation processes and staff awareness of them to make them more effective and also to ensure that consumers are aware of their rights, particularly with regard to the use of ADR, early in the process.

Best practice should be applied across the sectors to make escalation of complaints and problems easier for all consumers, but especially disabled, older, or vulnerable consumers, who may rely more on a service and may need that bit of extra help when dealing with a problem.

Ownership and use of telecoms services - keeping costs down

Communications – particularly digital communications – are the gateway through which savings elsewhere are available. We would therefore again reinforce the need for excellent and accessible availability, with strong support for participation. This must be acted upon to maximise the benefit to those most in need.

The following services must already be provided at no extra cost, by telecoms providers, who are accountable to Ofcom:

- Access to an approved text relay service with special tariffs to compensate customers for the length of the call.
- Free directory enquiries for consumers who are unable to use a printed directory because of a disability, with through-connection of calls
- Priority fault repair (for fixed line telecoms only) for customers who depend on the telephone because of ill-health or disability
- Third party bill management, to allow a family member or friend to manage a disabled person's account where nominated.
- Bills and contracts in accessible formats on request

Useful guidance for businesses is available from Ofcom ¹⁴and the Business Disability Forum¹⁵.

Older consumers, who are more like to have a disability, are also more likely to take a single telecoms service - for example, a fixed line rather than a bundle. We have encouraged Ofcom to ensure that such costs are competitive for all consumers.

¹⁴ <u>http://consumers.ofcom.org.uk/files/2010/05/callcentres.pdf</u>

¹⁵ http://businessdisabilityforum.org.uk/uploads/files/YCIITU_generic_2010.pdf

For disabled people who are online, reductions in costs can be seen in communications where apps replace specialised equipment. A good example of this is Next Generation Text Relay, which helps users have more natural conversations using speech as well as text, and is accessible on devices such as PCs, laptops, tablets and smartphones, preventing the need to buy a text-phone (costing approximately £300) – although text-phones can still be used.

Panel research on making phones easier to use

In 2011, the Panel commissioned a report titled <u>'Making phones easier to use: Views from</u> <u>consumers'</u>¹⁶ which showed that improvements in usability that would benefit disabled consumers would benefit consumers as a whole and again highlighted a need for better availability of information and support. Our recommendations are included at Annex 3.

Unexpectedly high bills and lost or stolen mobiles

In addition to the provision of tools by communications providers so that consumers can assess their spending, there remains a need for clear and effective communications between providers and consumers.

We welcome the recent agreement of major mobile operators to cap charges for lost and stolen mobiles to £100 if a loss is reported within 24 hours. We would highlight the need for disabled people to be able to use their preferred communication method to contact their service provider.

The Panel's new research project: 'Inclusive Communications' (working title)

The Panel is currently conducting research into the experience disabled consumers have when communicating with communications providers (and some other large organisations).

This new research project, due to report in 2015, builds on findings from the Panel's 2013 'Going Round in Circles' research (referenced earlier) which indicated that certain consumers such as older people and people with a disability seemed to be at a particular disadvantage in their dealings with communications providers.

The new, qualitative, study is designed to explore in more detail how accessible a range of organisations are to their customers and involves desk research to provide context. The customers of specific interest are those with additional communication support needs such as people with disabilities, and older consumers (aged 75+). The project will explore people's experiences of communications providers set alongside their experience of other large organisations in terms of:

- how accessible they make themselves to people with additional needs;
- how inclusive their points of contact are;
- the quality of service they receive via these channels;
- Best practice and obligations across sectors.

Based on research and awareness of disabled consumers' experience to date, we are strongly in favour of the Commission's recommendation (number 5), that disability and consumer organisations should coordinate to advocate for a new, stronger system to amplify the voice of disabled people dissatisfied with a supplier's services, and to improve the response to consumer complaints.

¹⁶ http://www.communicationsconsumerpanel.org.uk/making-phones-easier-to-use/making-phones-easier-to-use-2

3. Micro businesses as providers and consumers

The Panel recently published research <u>'Realising the potential: micro businesses'</u> <u>experiences of communications services</u>¹⁷ that examined the ways that communications services can help micro businesses to grow. It revealed that, in addition to infrastructure needs, there is still a need for information, advice and guidance specifically tailored for micro businesses.

Business owners were found to be time-poor, often performing multiple roles and complex pricing and packages made it hard for them to compare information and to determine the potential return on investment. They were reluctant to switch providers, as they were unsure of the service they would receive and feared loss of service for even a short period.

The research sample included a sub-set of micro business owners with a disability to explore whether having a disability gave rise to any specific issues with respect to communications.

A total of six respondents were recruited, with a range of disabilities that included hearing or visual impairment, mobility difficulties, rheumatoid arthritis and multiple sclerosis. The levels of disability across the respondents ranged from relatively mild to more severe difficulties, although none had been prevented from working by their condition at the time of the research.

Overall responses to the topic of communications services and technology were very consistent with the broader sample of business owners. As micro business owners these respondents faced, by-and-large, the same issues and challenges that other micro businesses faced in understanding and using communications within their particular business context.

However there were three differences that emerged from this element of the sample:

Enhanced importance of mobile communications:

Mobile technology was seen as having enhanced importance to business owners with mobility constraints by allowing them to access work from any location via a mobile device.

Increased reliance on residential services:

Business owners who experienced mobility constraints also placed greater importance on their reliance on residential services and being able to work at home as and when required. At certain times it was particularly challenging for them to journey to their work premises or a business meeting and therefore being able to conduct their business entirely from home was of particular value, as highlighted under section 1 of this response.

Strong interest in adapting technology to their needs:

An additional difference that emerged from business owners with a disability was about being able to access and procure technology that was adapted to their specific needs. This was particularly with respect to respondents who experienced difficulties in manipulating keyboards and keypads, a task that could become more challenging when using mobile devices. Respondents expressed a strong interest in exploring technology that provided easier to use key pads, voice control technology, and advanced headsets that would allow

¹⁷ http://www.communicationsconsumerpanel.org.uk/research-and-reports/realising-the-potential-microbusinesses--experiences-of-communications-services

them to work more easily. There was some awareness that such technology was available on the market, however few had directly experienced such devices. Respondents welcomed the idea of being provided with access to such technology either through providers or independent sources.

"I am trying to find a headset at the moment compatible with my wireless telephones. I have problems writing and therefore it is very difficult for me to hold a phone with one hand and write with the other. So if I have got a hands-free headset that would solve a lot of problems for me".

(Kitchen Worktop Manufacturer, Suburban England)

"Touch screen is a godsend because a lot of them use predictive text as well, and it will correct it when I'm typing. Digit control and pressure is much harder on a laptop for me". (Vehicle Graphics Company, Urban Scotland)

"Better voice activation would be useful so I don't have to type as much, but it needs to be more accurate and better at recognition". (Vehicle Graphics Company, Urban Scotland)

Empowering disabled business owners to grow their businesses means they will be in a stronger position to pass on the benefits to their consumers.

We would therefore encourage the Commission to include micro businesses in their project, both as providers of goods and services and also as consumers.

4. The provision of information

As highlighted throughout this response, the use of Plain English is vital when providing information that is accessible to all, as is the provision of information in a range of accessible formats.

The Panel would suggest the promotion of clear, accessible, easy-to-find, advice, intuitive to specific needs, which could be - and in many cases is already being - provided by support and advocacy groups and government departments.

Support is already available in the form of disability organisations for people with physical, mental and learning impairments, or any combination of the above. The range of impairments and needs is broad and this means that these organisations may be best placed to offer tailored advice on products and services that are specific and relevant to people with those particular needs, for example, older people and those on lower incomes.

However, and again in support of the Commission's recommendation number 5, we would welcome the coordination of disability and consumer organisations to advocate for a new, stronger system to amplify the voice of disabled consumers.

As highlighted by the Panel's research into the experiences of micro businesses, in section 3, disabled micro business owners have similar needs to other disabled consumers and should not be overlooked, not least because in improving their operations, they can act as an informed advocate and supplier to other disabled consumers.

We therefore agree with the Commission, that partnership is important, and recommend that businesses and disability/consumer organisations work together to identify and fill gaps in information accessible and available to disabled consumers. For example, clearer information on costs and options involved in contracts that they are required to sign up to.

We also support the Commission's recommendation (number 6) that statistics should be developed on the 'purple pound' in consultation with business and disabled people, and these should be regularly updated, to raise awareness of, and visibly improve, businesses' offering to disabled consumers.

Conclusion:

In conclusion, we believe that there are two main issues that need to be addressed:

Costs of products and services

- We agree that a new advocate group or network should work with businesses to identify barriers to bringing down the costs of products and services for disabled consumers (including micro businesses).
- We agree that statistics should be developed on the 'purple pound', to inform this work.

Access to information to make informed choices about cost

- We would like to see a new advocate network formed which will amplify the voice of disabled consumers (including micro businesses). Disabled consumers need continued support - to get and stay online and expand the breadth of their use of online tools - so that they have access to the best deals and can make informed choices.
- The promotion of clear, up-to-date, Plain English information, in accessible formats is key -whether online or via other channels.
- We urge the new advocate to encourage visible improvements in customer service and redress, and promoting switching.

Annex 1: Bridging the Gap: Sustaining Online Engagement

In 2010, the Panel developed a Consumer Framework for Digital Participation to help government and others increase the number of people using the internet. Against this background, the Panel has commissioned new research to consolidate stakeholders' experiences and learning in supporting online participation among people who are less digitally engaged , and also to gather information about supporting people to take the next steps online. Drawing on this research, <u>Bridging the Gap: Sustaining Online Engagement</u> details the Panel's clear recommendations to government and others.

In April 2009, the European Commission noted that "the internet has become a basic utility for homes and businesses in the same way as electricity or water". In 2010, the Digital Agenda built on this, stating: "As more daily tasks are carried out online ... using the internet has become an integral part of daily life for many Europeans." Referring to those Europeans not online, and the professional ICT skills shortage, the Commission stated that: "these failings are excluding many citizens from the digital society and economy and are holding back the positive impact that ICT can have on productivity growth."

In 2012, 22% of the UK adult population – eleven million people - still do not use the internet at home.

In the Panel's view:

- the challenge to increase participation is underestimated;
- meeting the challenge is underfunded; and
- people who remain unable to access online services will suffer increasing detriment if the challenge isn't met.

To seek solutions to these challenges, the Panel commissioned research among people who are less digitally engaged, and has reached the following conclusions:

- 1. For government to be able to maximize growth and fulfil the Digital by Default initiative, there needs to be a clearer and more comprehensive policy on take-up and use of, as well as access to, broadband.
- 2. To enable this, there is a pressing need to strike a better balance between funding for broadband roll-out and funding for ongoing support to enable people to take full advantage of the benefits of the online world.
- 3. To ensure that progress is made, it is vital that initiatives are open and accountable and that clear targets are put in place for take-up and use, based on an agreed definition of what constitutes an 'active internet user' for these purposes. Closer co-

ordination between initiatives across the UK, and an evaluation framework, would facilitate the accurate assessment and monitoring of progress.

- 4. The Panel considers that the frequently-quoted and widely-adopted measure of 'those who have ever/never used the internet' is not helpful for policy development. Progress should be measured by ongoing use, not by initial access alone. A more appropriate measure of people's ability to function online would be whether they have gone online themselves in the past month, together with an assessment of the breadth of their internet use.
- 5. Messages designed to encourage people to go online must acknowledge that people make an emotional and financial investment in going online. The messages need to explain online benefits in a language that connects with people's everyday life.
- 6. The Panel encourages suppliers to undertake the development of introductory low priced/low-risk products, teamed with low-cost broadband access, initially without long-term commitment, to reduce risk and promote trialling.
- 7. The tactics used to reach people who are not yet online need to be re-thought; and it is important that there is co-ordination between stakeholders, and agreed strategic aims. The potential role of local authorities, housing associations, employers and other related agencies and workers in the community (e.g. care workers) should be fully exploited, to embed awareness and an understanding of the possibilities online.
- 8. The Panel highlights the fact that the use of simpler technology, personalised support and emphasising the transferability of skills can bring real benefits for users and enable people to understand the usefulness of the internet.
- 9. The Panel strongly supports the drive to make websites simpler, designed around user needs and experience rather than those of the provider.
- 10. The Panel encourages coordinated overall support for agencies by Go ON UK, and a collaborative exchange of information. This would ensure a consistent message, and bring cost efficiencies for front-line agencies, to enable them to undertake more outreach activity.

Annex 2: <u>Going round in circles? The consumer experience of dealing with problems</u> with communications services - recommendations

The Panel issued five recommendations for communications providers to help improve the consumer experience.

1. The provision of better, jargon-free information to consumers about service expectations, simple troubleshooting tips as well as information about the complaints process.

2. A review and strengthening of contact centre staff training to ensure that staff:

a. Are able to establish a shared understanding of the problem with the consumer;

b. Have relevant technical expertise and are able to explain technical terms in layman's language; and

c. Have the ability to go "off script" and be empowered to take ownership of complaints, escalating the problem earlier in the process if necessary.

3. Improving the customer experience by:

a. maintaining better records on previous conversations with the consumer as well as providing the consumer with a free copy of their complaint records quickly and easily;b. the provision of a unique reference number and firm timescales, calling the consumer back when promised; and

c. ensuring that consumers can contact their supplier at a minimum via a freephone telephone number, email and post.

4. Providing greater support for older and disabled consumers, such as more signposting for those with severe hearing or speech impairments to their preferred contact method, e.g. email, SMS, text phone or text relay or video relay services.

5. Review and strengthen escalation and Alternative Dispute Resolution referral processes to ensure that both staff and consumers are aware of the options available.

Annex 3: Making phones easier to use: Views from consumers - recommendations

The Panel made the following recommendations, based on the findings of the research:

1. Implementing basic hardware and software improvements that will increase usability. The starting point should be those areas that would improve usability for all users - for example, ensuring phones provide feedback to indicate when a key has been pressed, have backlit key labels to make the numbers/letters/symbols on the keys easier to see, and that the phone size and shape allows one-handed use.

2. Maximising the opportunities offered by customisation, with pre-set options that can then be further refined.

3. Testing the usability of phones with consumers, including older and disabled consumers, in a way that takes account of their particular needs. Given the wide range of different needs and the complexity of ensuring that different features work well together, testing phones during and after the development process, including with older and disabled users, will be an important way of ensuring usability for a wide range of potential users.

4. Ensuring the sales and post-sales environment more effectively meets the needs of older and disabled people through a combination of better product availability, information and support.

5. Finding creative ways of providing mentoring and advice that would help people develop the confidence and skills to use the equipment.

Annex 4 - Evidence of available support

Getting and staying online

A number of organisations are currently providing free, or low cost support, which enables people to make choices to help keep costs down:

- As the Commission has highlighted, Aidis Trust provides guidance in selecting and using computer technology.
- AbilityNet offers free specialist support to disabled people, including free to download factsheets, telephone support and direct IT support from a network of volunteers <u>http://www.abilitynet.org.uk/advice-information</u> AbilityNet's list of Top Ten Accessible Apps list shows the range of apps that may be of use to disabled people.
- The Post Office: <u>http://corporate.postoffice.co.uk/getting-connected</u>
- The Mobile Manufacturers' Forum has a website which allows people to search for devices by accessibility feature: <u>https://www.gari.info/</u>
- Microsoft operates a scheme for free or cheap refurbished computers, with beginner-level advice and information: <u>http://www.getonlineathome.org/about-us.aspx</u>
- BT's website has a search function which allows people to locate local, free courses:

http://www.bt.com/includingyou/getting-online-find-a-centre.html

• Age UK have developed an affordable piece of adaptive, simplified, personalisation software, called Breezie, which is included with an affordable Samsung tablet and a basic level of support: <u>http://www.breezie.com/all-about-breezie/</u>

Making sure that websites can be accessed by all

- The Inclusive Design Toolkit University of Cambridge, Engineering Design Centre and sponsored by BT: <u>http://www.inclusivedesigntoolkit.com/betterdesign2/</u>
- The Business Disability Forum (BDF) a not-for-profit member organisation that, by its own description, brings together partners from industry to "make it easier and more rewarding to do business with and employ disabled people". Organisations should also be encouraged to sign up to the BDF's Technology Taskforce's Accessible Technology Charter. Advice and factsheets from the BDF are available here: http://technologytaskforce.org/accessible-technology-charter/#sthash.3mUCcutd.dpuf Businesses should document what works and share learning with the Business Disability Forum Technology Taskforce.
- 'Fix the Web' a project run by Citizens Online and funded by Nominet: <u>http://www.fixtheweb.net/</u> - volunteers contact organisations about issues reported by members of the general public.