



We're Not All the Same!

Older and Disabled People's Experiences of Contacting Communications Providers

Table of Contents

1	Executive Summary	3
2	Background.....	10
3	Key research findings	12
4	Experiences with communications providers - customer journeys ..	22
5	Obligations on Communications Providers: GC15	28
6	Cross-sectoral requirements.....	29
7	Ofcom Mystery Shopping: Information on telecommunications services for disabled consumers	35
8	Our recommendations	40

The views and opinions expressed in this report and references to experiences with individual communications providers are the personal responses of the participants who took part in the research. The experiences recalled have not been verified by Rica or the Communications Consumer Panel/ACOD.

1 Executive Summary

*"I think when everything's running fine in terms of communications networks,
I'm not as disabled as I might be."
(John, 41, multiple impairments, urban South England¹)*

If ever the power of reliable communications services to help improve people's lives needed summing up, we couldn't do much better than John's comment above. The key words are "...when everything's running fine" and as Members of the Communications Consumer Panel and the Advisory Committee on Older and Disabled People we strongly believe that, given the increasingly central role of communications in people's lives, society and the economy, it is vital to support fully everyone's communications needs. People are more reliant than ever on communications services as consumers, citizens and micro businesses. In the Panel's view, any sub-optimal delivery of communications services has ceased to be a cause of irritation for individual consumers and micro businesses - it is now an issue of real and significant detriment.

In 2013 we published our research report *Going Round in Circles?*² The report explored consumers' perceptions and experiences of communications providers' customer service and complaints handling. A key finding of the report was that older people, and people with a disability, seemed to be at a particular disadvantage in their dealings with communications providers, whose systems are not always as inclusive as they need to be.

We commissioned new qualitative research [Inclusive Communications](#) to explore in detail how accessible communications providers are to customers with additional communication support needs, such as people with disabilities, and older consumers (aged 75+). Research participants were selected to represent a range of types and severities of impairment, including: cognitive, speech, dexterity, mobility, hearing and visual impairments. Each interview explored the participant's individual experiences of: how accessible communications providers are; how inclusive their points of contact are; the quality of the service they deliver via these channels; and how well they meet the needs of people requiring additional support, identifying examples of best practice and opportunities for improvement.

¹ The names of the participants have been changed in this report to protect their identity.

² <http://www.communicationsconsumerpanel.org.uk/downloads/going-round-in-circles-ipsos-mori-annex.pdf>

Key Findings

- Communications services enable older and disabled people to overcome barriers to inclusion and to preserve and increase their social capital
- Customer service issues such as inflexible customer service responses and poorly trained customer service agents can cause problems and frustrations
- Systems-related issues such as passwords and call routing systems can act as barriers to inclusion
- There is a lack of awareness - among service users and some communications providers' staff - of specific rights for disabled people relating to equivalent access
- People use a variety of strategies to help overcome barriers to inclusion
- Some (but certainly not all) think that disclosing their impairment is a useful strategy to get a better experience
- Being assertive and making complaints are other ways of combating poor treatment but many were reluctant to switch

Communications services are important to all of us, but the research found that they can have even greater significance for older and disabled people by helping to mitigate some of the potentially disempowering effects of age or disability. They can help to reduce vulnerability by giving people access to information and services they cannot easily obtain through other channels, and by facilitating participation and inclusion. Accessing services online from home is of particular importance to participants who have difficulty with speaking, hearing or mobility. For some of the participants, communications services provide a vital support service which they rely on for their safety; e.g. community alarms. The internet, and increased ownership levels of portable connected devices such as tablets and smartphones, have been liberating and have helped enable participation in the outside world on a more equal footing.

An inclusive service is one that provides equal access to all users using the same mechanisms. Where the nature of the service or of an individual's impairment(s) makes this impossible, communications providers need to be able to adapt the service to meet the individual's specific needs. However the qualitative research found that some of the standard features of customer service systems such as passwords and the extensive options of call routing systems can act as barriers to inclusion for older and disabled people. The research also indicates that some systems are not set up to allow companies to support customers using assistive technology (e.g. text relay) and that some call centre staff are not necessarily aware of the existence of this technology.

Older and disabled people want customer service that is inclusive and accessible, and recognises that some people have additional requirements. Communications providers need to operate in a flexible way that is sensitive to the needs of the customer. Where additional adapted services are offered, they must suit the needs of the individual and be consistent and well sign-posted.

Customer service issues such as inflexible or generic customer service responses and poorly trained customer service agents can cause problems and frustrations. Call centre staff may lack the skills to communicate with callers with specific needs - for example, asking people with physical disabilities to check equipment when they are unable to do so. Even when people's specific needs have been registered they are not always taken into account, and the options offered are not always appropriate.

The General Conditions are a set of rules that apply to providers of communications services in the UK. In order lawfully to provide communications services, communications providers are required to comply with the terms of the General Conditions. General Condition 15 (GC15) contains a number of measures designed to promote equivalent access to communications services for disabled people. Many of the research participants were unaware of specific rights of equivalent access, but felt sure they should have some. This lack of awareness is compounded by the failure of some companies to promote effectively specific provisions and rights of equivalent access.

People use a variety of strategies to help overcome barriers to inclusion. The most practical way to mitigate the impact of disability when contacting organisations is to choose the channel of communication that best suits the individual's needs and capabilities. Some participants (but certainly not all) think that disclosing their impairment and their specific needs is a useful strategy to get a better experience, but there was a range of different attitudes towards disclosure. Ultimately, the positive consequences of disclosure are that it can result in a better experience, as it allows service providers to respond more appropriately.

Some participants reported needing to ask for help from third parties; they recognised the need to be assertive but didn't feel able to be so. Few had made formal complaints. Some people said they had considered switching provider when service levels had been extremely poor - however many could not face the effort involved in setting things up with a new provider. This can affect disabled people disproportionately as they may have gone to considerable effort to set up their service as they need it.

Cross-sectoral desk research

We commissioned [desk research](#) intended to provide background context to the Rica qualitative research study. From the desk research, reviewing the current regulations and standards relating to older and disabled people's access to services

and the research conducted by regulators and the Citizens Advice Bureau (CAB), some general points emerged about the role of regulators, companies and governments. Citizens Advice commissioned research by the Centre for Consumers and Essential Services (CCES), University of Leicester - *Tackling consumer vulnerability: regulators' powers, actions and strategies* (2014).³ This study suggests that the focus of governments and regulators on promoting competition has [still] left consumers facing difficulties and it asks what the balance should be between depending on market mechanisms and formal intervention. It points to the need for the regulators to have in place an *"effective means of 'external auditing' that involves a range of relevant organisations which work with consumers in vulnerable circumstances. This should not be a one-off exercise but one that becomes an integral part of the regulators' consumer vulnerability policies and monitoring."* (CCES 2014, p7)

Citizens Advice point out that companies have different policies and practices, which places the onus on the regulators to help drive forward good practice. The research also notes that: *"While the regulators have a central role to play, government too has a critical role in tackling the causes and consequences of consumer vulnerability in these essential services. It is clear that there is often a gap between the expectations of consumers and the public about what regulators can do and their actual statutory powers."* (CCES 2014, p14)

In the qualitative research carried out for the Panel and ACOD, consumers mentioned what appeared to be a more proactive approach by energy providers. In the communications sector, communications providers have an obligation - in order to comply with GC15 - to take reasonable steps to ensure that the services they provide are widely publicised, including in appropriate formats and through appropriate channels for disabled end-users. The requirement placed upon energy providers is to inform **all** customers of *the existence of the priority service register (PSR) and the process for becoming registered on the PSR*. We consider that this is a positive step that ensures customers are aware of the register and what it can offer. In our view, the promotion of GC15 services and equivalent access channels to all customers would have many benefits - raising awareness throughout the customer base and not just amongst people directly affected - and potentially helping to avoid the discomfort that some people experience as a result of having to state their needs, sometimes repeatedly, to organisations.

³ https://www.citizensadvice.org.uk/Global/Migrated_Documents/corporate/tackling-consumer-vulnerability.pdf

Ofcom's mystery shopping research

In August 2015, Ofcom published the results of its mystery shopping exercise about information on telecommunications services for disabled consumers.⁴ The results suggested that disabled consumers may not consistently be getting the information they need in order to find out about the services that are available to them via in-store, online or telephone interactions. We agree with Ofcom that this gives rise to a serious concern that there is a risk of significant consumer harm within the UK communications market. For all enquiries, telephone yielded more specific information about key services relevant to the scenario provided, compared to online or in-store enquiries. This is of particular concern, given that our research has identified that some older and disabled consumers specifically choose to contact their communications provider online or in-store as they find these channels more accessible than via the telephone.

Conclusion

Two main facets of communications services are access to the technical product or service itself; and the customer services related to its provision from a communications, or other, provider. In terms of access to and use of the product or service Ofcom's recent, large scale, quantitative research⁵ highlights that access to communication services such as the internet and mobile phones is generally lower for consumers with a disability than for those without, even when demographic factors have been taken into account. A fifth of disabled consumers said their disability prevented their use of at least some communication devices and services, with differences seen among consumers with different types of impairment. This affects a large number of people.

To enable consumers and citizens to benefit from the opportunities offered by modern communications services, it is vital that they are appropriately supported to do so. The Panel's qualitative research into older and disabled consumers' experiences published alongside this report and Ofcom's mystery shopping research about information on telecommunications services for disabled consumers combine to form a powerful evidence base which strongly suggests that some older and disabled consumers encounter a further barrier to effective use of their communications services. They are not receiving the quality of customer service to which they are entitled from their communications providers. This is unacceptable.

⁴ http://stakeholders.ofcom.org.uk/binaries/research/telecoms-research/mystery-shopping-disabled-consumers/Disability_charts_2015.pdf

⁵ <http://stakeholders.ofcom.org.uk/market-data-research/other/cross-media/disabled-consumers-ownership-comms-services/Disabled-consumers-use-of-communications-services/>

The consumer experiences outlined in the Panel's and Ofcom's reports highlight a number of systemic issues, along with opportunities for improvements. Our recommendations below seek to address those issues highlighted by the reports, providing tangible actions for providers to not only improve the experience of older and disabled consumers, but to also increase the attractiveness of their businesses to those people.

Our Recommendations

1. Recommendations for communications providers and Alternative Dispute Resolution (ADR) services

a) Enhance customer service

- Provide a service that provides equal access to all users regardless of any impairments they have
- Allow consumers to communicate in the way that best suits individuals' needs and abilities
- All staff - and especially contact centre agents - should have disability training so they understand people's situations and the equipment they may be using
- Customer service agents must use clear language and be trained and empowered to depart from scripts when necessary
- Develop and promote a culture that exemplifies offering a flexible solution and taking extra time to explain details when required
- Seek the views of disabled and older customers on their experience and ask for their suggestions for improvement

b) Match communications systems and processes to individual needs

- Communications providers and Alternative Dispute Resolution (ADR) services should both ensure contact channels are inclusive or provide and promote alternative, appropriate, equivalent methods of access and communication
- Ensure that all customers can easily use customer service systems - including making a complaint - and monitor that this remains the case
- Call steering menus should have no more than three options and if the customer doesn't select any option, the call should go to an agent rather than be disconnected
- Ensure that people using assistive technologies can contact customer services without being disconnected
- Keep a record of needs and ensure that all contact is in a suitable/accessible format, including outgoing as well as incoming communications
- Maintain clear records of previous contacts with the consumer

c) Have a dedicated disability team

- Explore ways to identify customers who need extra help and get them to the right place quickly
- Provide a dedicated person or team to deal with disabled customers
- Offer specialist access routes - designed with and around people who are going to use them
- Relevant customers should be routed direct to these specialist teams via provision of a specialist number or transferred to the team by an agent
- Specialist routes need to be signposted
- Offer flexible third-party arrangements, including the possibility of multiple pre-arranged registrations, so other people can assist the account holder⁶

d) Better promote equivalent access channels/ GC15 service provision

- Inform all customers of the existence of alternative access channels and the services and rights available under GC15 - especially the priority fault repair register and the safeguard scheme, including third-party bill management.
- Actively promote services and rights of equivalent access in line with GC15 and make these rights explicit in communications
- Ensure full operational compliance with GC15
- Proactively offer equivalent access channels

2. Recommendations for consumers

- Understand the impact of choosing to disclose, or not, your disability/situation and any equipment you use
- Be aware of your rights under General Condition 15 (See Section 5 below) and any additional services for disabled people offered by your provider
- If appropriate and you are eligible, register for the Priority Fault Repair Service
- Be specific about your needs and what you want provided
- Shop around and consider switching provider
- Use complaints procedures, up to and including Alternative Dispute Resolution, if you are not happy with the service you receive

⁶ Requiring the customer to nominate a third party in advance is intended to reduce the risk of fraud

2 Background

In 2013 the Communications Consumer Panel published its research report *Going Round in Circles?*⁷. The report explored consumers' perceptions and experiences of communications providers' customer service and complaints handling. A key finding of the report was that older people, and people with a disability, seemed to be at a particular disadvantage in their dealings with communications providers, whose systems are not always as inclusive as they need to be.

This [new research](#) has been commissioned by the Communications Consumer Panel (the Panel) and the Advisory Committee on Older and Disabled People (ACOD) to explore in detail how accessible communications providers are to customers with additional communication support needs, such as people with disabilities and impairments, and older consumers (aged 75+). The primary objective of this new qualitative research was to explore and understand the actual experiences of disabled and older people, identifying examples of best practice and opportunities for improvement.

Specifically, the Panel and ACOD wanted to understand:

- people's perceptions and experiences of contact with communications providers;
- what opportunities exist for improving contact with communications providers;
- what barriers people face and what coping strategies they use when communicating with communications providers; and
- whether people are aware of accessibility alternatives, and how transparent these alternative provisions are.

To provide a wider context, the study was designed to explore people's experiences of communications providers alongside their experience of other large organisations. The research was conducted by Rica (Research Institute for Consumer Affairs), a specialist research organisation working with disabled and older consumers. Rica interviewed 41 older and disabled people during February and March 2015. Participants discussed their experiences of communication services and communications providers. The interviews were qualitative in nature and took place in the participant's home in most cases.

Participants were selected to represent a range of types and severities of impairment, including: cognitive, speech, dexterity, mobility, hearing and visual

⁷ <http://www.communicationsconsumerpanel.org.uk/downloads/going-round-in-circles-ipsos-mori-annex.pdf>

impairments. The sample included people with multiple or complex impairments and people who were 75 or older.

Each interview explored the participant's individual experiences of how accessible communications providers are, how inclusive their points of contact are, the quality of the service they deliver via these channels, and how well they meet the needs of people requiring additional support⁸.

You can read the full report [here](#).

We also commissioned [desk research](#) looking at accessibility across the sectors, intended to provide background context to the Rica-led qualitative research study.

⁸ The views and opinions expressed in this report and references to experiences with individual communications providers are the personal responses of the participants who took part in the research. The experiences recalled have not been verified by Rica or the Communications Consumer Panel/ACOD.

3 Key findings from our qualitative research

Communications services enable older and disabled people to overcome barriers to inclusion and to preserve and increase their social capital

"I think when everything's running fine in terms of communications networks, I'm not as disabled as I might be."

(John, 41, multiple impairments, urban South England)

"Your landline is your... passport to the outside world."

(Alexander, 70, dexterity impairment, rural Wales)

- Communications services are important to all of us, but can have even greater significance for older and disabled people by helping to mitigate some of the potentially disempowering effects of age or disability.
- They can help to mitigate vulnerability by giving people access to services they cannot easily obtain through other channels. Accessing services online from home is of particular importance to participants who have difficulty with speaking, hearing or mobility.
- Communications services facilitate participation and inclusion. They can help overcome social isolation by providing networks and channels for participation. Use of social media, in particular, has helped people extend their friendship networks without needing to leave the house.
- Communications services offer a lifeline, allowing access to support groups and services and providing a means of accessing information resources from home.
- For some of the participants, communications services provide a vital support service which they rely on for their safety - e.g. community alarms.

The internet, and increased ownership levels of portable connected devices such as tablets and smartphones, have been liberating and have helped make life easier for many

"I feel I can be part of the outside world with my internet. And nobody needs to know how I'm feeling or how I'm looking on any particular day. So, it's actually, I put that above everything."

(Gail, 53, multiple impairments, Urban North England)

- Home broadband, in particular, has provided a channel which enables participation in the outside world on a more equal footing.

- Portable connected devices such as laptops, tablets and smartphones have allowed access to the internet from wherever people are, both inside and outside the house. For many, this is empowering.
- Device size and screen size, alongside swipe-screen functionality, are particularly important for people with dexterity problems.

For some, fixed-line services are of decreasing importance, while for others they offer security and comfort, or access to vital services

“My house phone’s not even plugged in ...I find the home phone is all sales calls, PPI and I just unplug it and don’t use it. [...] You don’t use your phone as much because you’ve got your mobile and you have so many minutes on it that are free.”

(Eileen, 48, multiple impairments, urban Scotland)

“I have phones all over the house. I have four phones connected, so that I don’t have to run”

(Margaret, 73, mobility impairment, suburban Scotland)

- Many participants claimed they rarely used their landline, preferring to use a mobile phone or alternative channels (e.g. Skype, instant messaging, and company web chat services). Cited reasons for this include: calls on the landline are often nuisance calls; mobile phone packages include free calls and a mobile phone or the internet, or web-based services are simply more convenient.
- However, some participants continue to use their fixed-line service. For some it provides a sense of security and continuity; for others it offers access to vital safety services.

Mobile phone use is not universal

“When the contract expired, I went in and I said, look, I’ll pay-as-you-go. You know, I’ll put £10 on and when that’s gone I’ll top it up. And I found that this money was draining away. I wasn’t using it but when I wanted to it had been used up in some form or another. ”

(Bill, 84, urban Wales)

- Not all participants used a mobile phone or smartphone, while some said they kept them for emergencies only. Infrequent use can cause difficulties, as unused mobiles can run out of battery charge and credit, even if they are not being used.

An inclusive service is one that provides equal access to all users using the same mechanisms. Where the nature of the service or of an individual's impairment(s) makes this impossible, communications providers need to be able to adapt the service to meet the individual's specific needs

"... you want to be treated like any ... I was going to say "normal person" but I am a normal person. You want to be treated like everybody else; you don't really want special... you don't want to be treated any differently."
(Ann, 65, mobility impairment, rural Scotland)

"I don't want to be treated differently because I've got a disability, but I need to in some instances, or some occasions whatever. But if I say to people I've got a brain injury, but I don't want to be treated differently, and they don't treat me differently, that's great to me."
(Annette, 50, cognitive impairment, rural Northern Ireland)

"You know, you get fed up with it. I mean, it's a service they need to provide for your needs, not just one service. Not everybody's the same. They have to think of everybody's communication needs."
(Eric, 34, Deaf, urban South England)

The extent to which a person requires special provision to access a service is affected by the individual's capabilities as well as by the inclusiveness of the service itself.

- Some of the participants believed strongly that all services should be fully inclusive and that there should be no need for special measures to provide accessibility. Some people felt special measures were sometimes necessary. Other participants, particularly those with hearing and sight impairments, had specific requirements which meant that they needed services to be adapted to their needs.

Customer service issues such as inflexible customer service responses and poorly trained customer service agents can cause problems and frustrations

"... you're talking to robots. They're not understanding. Especially when you've got cognitive dysfunction, like I have. No understanding whatsoever."
(Tracy, 55, cognitive impairment, suburban South England)

"I think that someone was so shocked when I explained that I couldn't go and unplug wires, and things. That really summed it up, that it was just completely alien to them. And, you know, I'm quite sure that whoever it

was that I spoke to was very well aware that disabled people exist, but there was not room in their world view for the possibility that they might be speaking to somebody who just couldn't physically do what they were suggesting. And clearly there's no room in the company's world view to provide a service accessible to me."

(Sarah, 30, multiple impairments, urban North England)

"Even though on some occasions they've said we'll mark it down in the future and you won't need to tell us again ... for some reason it's not gone on their standard database. It would be nice if it came up with: this customer is blind and has a special device, so just give them a new password if that's what they ask you."

(Paul, 62, blind, urban North England)

"I tried this number with text relay, there's a delay which the people at the other end just hear, you know, the phone ringing and then a long delay and so they kept cutting it off. When I eventually got through they said we just thought it was a cold call."

(Gerald, 32, deaf, rural Northern Ireland)

- Call centre staff may lack the skills to communicate effectively with callers with specific needs. Their lack of sensitivity and understanding can introduce barriers to access for disabled consumers: for example, asking people with physical disabilities to check equipment when they are unable to do so or causing people to feel embarrassed about needing extra time to understand what is being said to them.
- Even when people's specific needs have been registered they are not always taken into account, and the options offered are not always appropriate.

Systems-related issues such as passwords and call routing systems can act as barriers to inclusion

"And it's hard as well, like if you're having... if you're having a bad hand day, because holding phones can be a problem and the pushing the buttons and remembering."

(Eileen, 48, multiple impairments, urban Scotland)

"They ask you to key in numbers, and when you've got the mobile phone, I'm sure there is a way of doing it, but I'm not privy to that information, therefore all I could do was hang up."

(Alexander, 70, dexterity, rural Wales)

"By the time they get to number five or number six I can't remember what number one was, and then I have forgotten and I have to hang up and then

I have to start again..."

(Nicola, 65, multiple impairments, rural Northern Ireland)

"What they want to do is to get onto your computer and share your screen. I can't do that with them because I've not got a screen [...] because I'm using a bespoke device configured for blind people, so I have to say to them I'm sorry, you can't go on my screen."

(Paul, 62, blind, urban North England)

- Some of the standard features of customer service systems can present a barrier for older and disabled people. These barriers include menu systems which require dexterity for keypad responses, and good memory recall when presented with extensive lists of options in a call routing system. Password recall can also be a challenge for some people.
- The research indicates that some systems are not set up to allow companies to support customers using assistive technology and that not all call centre staff are necessarily aware of the existence of this technology. For example, delays in text relay calls can result in calls being cut off by operators. Similar problems can occur with the use of communications apps/voice synthesizers, where voice technology makes a real person's voice sound like a computer call, resulting in the service centre operator terminating the call.
- Channel-specific deals (e.g. offers that can only be accessed by internet or phone) offered by communications providers can create disadvantages. If deals are exclusive to one communication channel, people who do not communicate via that channel are automatically excluded.

There is a lack of awareness - among service users and some communications providers' staff - of specific rights for disabled people relating to equivalent access

"I don't know of any such thing. When you join somewhere like (communications provider X) or anyone - (communications provider Y, Z)... there's no box to tick saying "By the way, I'm disabled and..." they don't seem to ask that question."

(John, 41, multiple impairments, urban South England)

"I didn't know that either, and especially with having nobody at home, help is pretty fragile so that would be something that would be really important to know, actually. I'm quite shocked that I didn't know that."

(Sarah, 30, multiple impairments, urban North England)

- Many of the research participants were unaware of specific rights of equivalent access, but felt sure they should have some. This lack of

awareness is compounded by the failure of some companies to effectively promote specific provisions and rights of equivalent access.

People use a variety of strategies to help overcome barriers to inclusion

"...it's easier face to face with somebody ... when you have a disability ... I explained to the fellow what I wanted and he sorted me out there and then, there was no, you know, and I didn't have to try and explain it a dozen times, just the once..."

(Nicola, 65, multiple impairments, rural Northern Ireland)

"Everything for me must be done via email. ... It's there all the time and with my cognitive dysfunction if it's there I can ... respond to one sentence at a time so I can keep reading it, then respond, whereas if you've got to try and remember a whole letter and type to it you can't..."

(Tracy, 55, cognitive impairment, suburban South England)

"And ringing up, I think it's still the press one for this, press two for that, press X for that. So, if you really want to get hold of somebody quickly you phone one of the sales lines."

(Peter, 64, blind, suburban Northern Ireland)

- The most practical way to mitigate the impact of disability when contacting organisations is to choose the channel of communication that best suits the individual's needs and capabilities.
- Making contact with a named individual is another common strategy.
- Some people employ methods of short-circuiting call routing systems in order to speak to a person.

Some (but certainly not all) think that disclosing their impairment is a useful strategy to get a better experience

"That information should be mine to give, not somebody else's to take. And it might be that sometimes I feel it's irrelevant. And, actually, with comms I feel it's very relevant and I would definitely choose to tell them, but I wouldn't want somebody else to judge whether or not they needed to know. It needs to be my decision whether or not they need to know."

(Sarah, 30, multiple impairments, urban North England)

"I did come to terms with the idea that I'm disabled, which I don't like being, but there you go, I am. It is a condition, multiple sclerosis, because it's a medical condition [...] I'd rather be a normal customer... or they consider to me to be as normal as needs be."

(John, 41, multiple impairments, urban South England)

"... the minute they see the wheelchair, or the minute you mention wheelchair on the phone, ... the tone goes down ... you can almost see their body language and... They're not all like that but a lot of people ... they assume that you haven't got a brain cell, you know."

(Ann, 65, mobility impairment, rural Scotland)

"When I said I've got a brain injury they said "Are you okay?" [speaking very slowly] And I thought, we've just had a conversation of half an hour, of course I'm okay, why are you saying it like that?... I thought, it's heart-breaking, and it's off-putting, and it puts me off contacting them again if I don't have to."

(Annette, 50, cognitive impairment, rural Northern Ireland)

"I remember saying, if I'm repeating everything that somebody's saying to me, and I can hear them then, after a few minutes I'll go like, their tone of voice kind of changes, you know. Like they're getting fed up with me. I will sometimes say, look I'm sorry, I've got a brain injury, that's why I'm just making sure everything is correct here."

(Annette, 50, cognitive impairment, rural Northern Ireland)

"When I go in their shop with my wee trolley in front of me, with my leg being dragged, as it does tend to, behind me, and I start to talk to a person, they can see; if you're at the end of a phone that man has no idea that there's anything wrong with me, I have to tell him, I have to explain, look, I had a stroke, I have aphasia, so sometimes I get muddled."

(Nicola, 65, multiple impairments, rural Northern Ireland)

"I have learned over the years that it's, it behoves me to let them know that because you go on the list and ... for my provider, for, well, for all services, they do have a special list and a special number that can get through quicker if they know, you know, you're having to struggle a bit. But in the beginning I did find it hard to have to admit that."

(Rosemary, 64, dexterity impairment, rural South England)

- There was a range of different attitudes towards disclosure. Some people are perfectly happy to discuss their disability, especially if it helps them to get what they need. Some feel strongly that it is their choice whether to disclose or not, and they will do this only if it is relevant to the issue at hand. Others feel they shouldn't have to disclose their disability in order to receive the service they need; they consider it unnecessary and they don't want special treatment.
- The positive consequences of disclosure are that it can result in a better experience, as it allows service providers to respond more appropriately.

Being assertive and making complaints are other ways of combating poor treatment but many were reluctant to switch

"I have had help sometimes, from my fiancé, who sort of intervenes and takes over conversations because he can deal with it a lot better than I can. You know, he's... I'm not very quick at coming out with things any more. I've got to really think about it, so you tend to be off the point and think, I never said this and I never said that, whereas he's really good."
(Eileen, 48, multiple impairments, urban Scotland)

"It seems quite hard. Quite daunting. You know, having known it for a bit, and then, sort of, moving through the processes of getting it all back up and running, and feeling like there wouldn't be very much help, actually, to get it done."
(Sarah, 30, multiple impairments, urban North England)

"Whether I could go through the hassle or not again ... am I going to get passed from pillar to post? Are they going to tell me to ring back ... on a different number? Am I going to get speaking to the same person again, or am I not, or? So no, it's not worth it all."
(Annette, 50, cognitive impairment, rural Northern Ireland)

- Assertiveness can help individuals achieve positive outcomes. Some people are aware of their power as consumers, and are prepared to threaten to change provider in order to get a problem resolved or to secure a better deal.
- Some people reported needing to ask for help from third parties; they recognised the need to be assertive but didn't feel able to be so.
- Few had made formal complaints. Most were focused on the resolution of problems and the strategies they used to achieve that, including, on occasions, escalating to someone with greater authority.
- Some said they had considered switching provider when service levels had been extremely poor. But a high level of inertia meant that many were inclined to leave things as they were; they could not face the effort involved in setting things up with a new provider. This can affect disabled people disproportionately as they may have gone to considerable effort to set up their service as they need it.

Best practice - examples in action and what communications providers could do

Older and disabled people want customer service that is inclusive and accessible, and recognises that some people have additional requirements. Communications providers need to operate in a flexible way that is sensitive to the needs of the customer. Where adapted services are offered they must suit the needs of the individual and be consistent and well sign-posted. The following quotes from our research participants highlight particular elements of best - and least - effective - customer service.

"...they put me through to this disabled line and it was a young lady I was talking to. She said, while we're at it have you got any other problems and I explained to her that my eyes are playing up. Oh, she said, well we can ... send you a large print bill. I said okay then, that will be fine. It came about during a conversation, you know, and she was quite chatty and very helpful. That's how it came about."

(Beth, 78, suburban South England)

"Well, they just sounded as if they were interested in me It wasn't just a task that they had to complete, you know, they talked to me as if I was a person...."

(Elizabeth, 66, partially sighted, rural North England)

"I think what's good about it... you know they've got a record of you. You know they know what your problems are, so you don't have to explain every time you phone. It comes up and they know that there's a problem and they are really, really nice."

(Eileen, 48, multiple impairments, urban Scotland)

"I'm sure I speak to the same one quite a lot but I've never said that to her. But they're very... you know, I'm saying, well, it's going to take me a minute to bend down and unplug that. Take your time, there's no rush at all with the service, you know, there's no hurry. So it's very sensitive ..."

(Sandra, 77, suburban South England)

"My provider was good because... they can go through a service whereby they will access an interpreter. So I can chat in front of my computer. I can chat and the interpreter is on the other end with a mouthpiece, talking to my provider. So that was good. I enjoyed that service."

(Eric, 34, Deaf, urban South England)

"She must have had ten minutes extra on the phone waiting for me to do one thing and then another thing, you know, it was so comfortable to do that, and she was so good."

(Paul, 62, blind, urban North England)

"I think if you could have a bit of empathy from them. You don't want sympathy and, oh, you poor thing and all this. You just want them to... if you've given them that information you want them to make allowances for that, and so if they're not making allowances for that you know that they don't care, they're just doing things by rote."

(Elizabeth, 66, partially sighted, rural North England)

"...have people that are better trained in terms of, you know, dealing with people with disabilities, who may be embarrassed by it, and don't want to

bring it up."

(Edward, 58, dexterity impairment, rural Scotland)

"I mean, that was probably one of the main reasons I left my provider. So, it wasn't that they didn't want to speak on the telephone; they just didn't have any understanding of my difficulties, not just with the laptop but my physical difficulties."

(Ann, 65, mobility impairment, rural Scotland)

"With my previous provider you're stuck. There's nowhere to go. But with my new provider, you can physically go along to a shop. That's a nice feeling. And staff are very friendly. And generally they solve any problems."

(Eric, 34, Deaf, urban South England)

"...if organisations had a specific person even, who dealt with disabled people. They could, one person could focus more on disabilities, how disabilities can affect people. What disabled rights are. Or what rights people with disabilities have. They would know more of the rights, and the people with disabilities could speak to the same person each time."

(Annette, 50, cognitive impairment, rural Northern Ireland)

"But the banks are pretty good now, the banks that I use are pretty good at sending braille, and so are the gas and electric companies. They send me actual ordinary correspondence in braille as well as the bills... and my communications provider... I'm sorry, they don't."

(Paul, 62, blind, urban North England)

"I'm not embarrassed about ringing [named bank adviser]. Because I know I don't have to go through that again. Whereas, you know, tomorrow, say I was, I'd ring, I don't know, [a communications provider] I'd have to go through it again and again and again and again and you can only do so much of that before you literally go and crawl away and die."

(Gail, 53, multiple impairments, Urban North England)

"I think they have quite a high turnover of people who work in call centres, you know, so they have little experience, I think, in dealing with people who are different.... In their basic training, and I know it's all money and everything's cost and, you know, even if it was only four or five sentences taken within their training saying, you know, you may get a person whose speech is poor or, you know, whose communication skills are poor in general, try to be understanding ...Do not assume that these people are stupid people and don't treat them like idiots don't talk to me like that, you know. I'm not a blithering idiot, you know, I'm a person."

(Nicola, 65, multiple impairments, rural Northern Ireland)

4 Experiences with communications providers - customer journeys

The qualitative research highlighted the details of participants' experiences with communications providers. These narratives describe experiences that illustrate the importance of inclusivity of customer contact, and what provisions, if any, are made to accommodate the particular communications needs of older and disabled people.

CASE STUDY 1: ERIC, 34, DEAF, URBAN SOUTH ENGLAND

Eric works in a secondary school as a part-time freelance teacher of sign language, and is also a deaf instructor, working in schools to promote the educational inclusion and achievement of deaf and hard of hearing pupils.

Eric sees the usefulness of communications technology and plans to explore new services and technologies to see if they work for him. He uses the next generation text relay (NGT) service, iPad Air, Skype and textphone, and wishes all his devices were interconnected with Bluetooth. Eric changes his communication methods according to whichever best meets his needs. He shares information about technology with other members of the deaf community.

Eric has had numerous problems with his fixed line service. He has contacted his provider about this (by text relay and through the provider's web chat service) but they have been unable to diagnose the fault. They offered to send an engineer to investigate, but warned Eric that he would be charged if the fault turned out to be with his equipment. He was unwilling to take this risk, so the problem has still not been resolved. If he were not deaf, Eric considers that he would be able to check for himself whether the phone line was working - as he could hear the dialling tone - and he feels he is being disadvantaged by the inflexible approach of his provider. He thinks they should send an engineer to check his line and equipment without charging him.

CASE STUDY 2: ANN, 65, MOBILITY IMPAIRMENT, RURAL SCOTLAND

Ann lives in Fife, Scotland, alone in rented accommodation. She has adult daughters who live nearby. She worked until she was 60 as a customer services agent for a bank. She has a pay TV package and uses a mobile phone and a tablet computer.

Ann had polio as a child and uses a powered wheelchair. She has a hoist to get it in and out of her car. She frequently travels into Edinburgh by train, for which she does not book assistance. She feels that people sometimes look down on you if you are disabled and does not like to make an issue of it.

She recently had a problem with her television service. She called the customer service line for help with it. The agent asked her to go behind her TV set to reset the digibox, which she reluctantly explained she could not do because of her wheelchair.

The agent offered to send an engineer without charge to resolve her problem, since she wasn't able to do it herself. Ann welcomed this offer but refused, as she knew her daughter was visiting later that day and could easily perform the necessary operation for her.

CASE STUDY 3: LUCY, 28, LEARNING DISABILITY, URBAN WALES

Lucy lives in a small town in west Wales. She lives alone in a house on the high street.

Lucy has a learning disability, which affects her ability to manage her affairs and her social relationships. Despite this she is able to take responsibility for her own affairs to a great extent. Her parents live nearby and they help her from time to time; she also uses the services of a community group that supports people to live independently. She works in their community centre near where she lives.

Lucy uses a mobile phone for making calls and texting. She bought the phone herself at a supermarket and set it up with help from her parents. She has a land line and home broadband. The contract for these services was set up by her parents, but she is able to look after it. She has good experiences of dealing with service providers generally, *“as long as they are kind”*.

She recently had to call her provider when her internet service stopped working (a friend helped her find the number) and they were able to talk her through the procedure to check and restart her router, which seemed to resolve the problem. The agent she spoke to was very understanding. Lucy did not disclose her learning disability, but felt the agent must have been able to tell. She was pleased that they were able to resolve her problem without making her feel under pressure.

CASE STUDY 4: GERALD, 32, HEARING AND SPEECH IMPAIRED, RURAL NORTHERN IRELAND

Gerald is in his early 30s. He was born with one ear not developed at all and problems in his other ear. He is in close touch with his mother who he relies on for third party help with day to day communications with companies and so on.

Gerald can lip read and has functional, if indistinct, speech so if he has a cooperative communication partner, he can make himself understood.

Gerald's accounts with his providers are in his mother's name, which always complicates his contacts with them. Once when he was trying to contact his mobile phone provider, to find out how much time was remaining on his contract, they would not tell him and he had to go to his mother's house and get her to ring them.

Recently his broadband service stopped working. He phoned his provider to try to resolve the situation, but they couldn't understand his speech. When he did manage to make himself understood (on another phone call), they again refused to deal with him as he was not the account holder⁹. Eventually, Gerald took his mother to the provider's booth where they had first signed up for the service and spoke to a sales agent there, who phoned customer services for them and booked an engineer. The service was restored after six days' delay, which was extremely inconvenient to Gerald as it left him without internet services for that time.

⁹ Gerald would be eligible for third party bill management where he is the account holder and his mother is nominated as a registered third party.

CASE STUDY 5: EILEEN, 48, MULTIPLE DISABILITIES, URBAN SCOTLAND

Eileen is in her late 40s. She lives with her two daughters, who are in their late teens. She developed multiple sclerosis around 10 years ago and was forced to give up her job and her house. They now live in a rented bungalow. Eileen does craft activities and has begun to sell her work at fairs and online.

Eileen uses a smartphone with a large screen for calls, texting and internet access. She has a landline but does not use it much. She does not have pay television services.

Her MS affects her memory and confidence as well as her dexterity and mobility. She finds it helpful to mention this at the start of calls to customer services, so that the agent she's talking to has the opportunity to react appropriately.

The nature of her disability fluctuates from day to day. When she is experiencing particular difficulty in resolving a problem she asks her fiancé for help.

Eileen has recently renewed her mobile phone contract. She wanted to stay with her existing provider, but found a better deal with a different provider. She phoned her existing provider and asked them to match that deal, which they agreed to. She says she is able to do things like this when she feels up to it. On other days she will ask her fiancé.

CASE STUDY 6: MARY, 65, MOBILITY IMPAIRMENT, RURAL NORTHERN IRELAND

Mary lives with her husband in a rural part of Northern Ireland. She has recently retired but previously was very active in the disability world in Northern Ireland, running a chain of mobility shops as well as a variety of community groups.

Mary had polio as a child, which has affected her mobility and caused scoliosis (curvature of her spine). She uses a wheelchair most of the time but sometimes uses a mobility scooter for going out into the countryside.

Mary is an enthusiastic user of new technologies and has a smart phone and tablet as well as a desktop computer: *"I'm very into computers, I just love the technology."*

Mary recently had a problem with her triple-play service (broadband, television and telephone), for which she had to call the provider's customer service line. She did not tell them about her disability until the agent asked her to turn the power off on the router. She did feel that the agent had been very patient with her up to that point and that he reacted appropriately to her disclosure. She explained that it would take her some time to turn the power off and she was concerned that the call would be disconnected and she wouldn't be able to get the same agent back again if it did so she asked if he could call her back if she got disconnected.

The agent initially said that he couldn't do that, but after speaking to a supervisor agreed to do so, which Mary found reassuring.

5 Obligations on Communications Providers: GC15

The General Conditions are a set of rules that apply to providers of communications services in the UK. In order lawfully to provide communications services, communications providers are required to comply with the terms of the General Conditions. General Condition 15 (GC15) contains a number of measures designed to promote equivalent access to communications services for disabled people. Under GC15, all providers of publicly accessible telecommunications services in the UK (fixed and mobile) must offer their disabled customers a range of services, including:

- Provision of free directory enquiries for visually impaired people;
- Access to a text relay service for deaf and speech-impaired people;
- Provision of a priority fault repair service for users with disabilities who have a genuine need for an urgent repair;
- Provision of a safeguard scheme for disabled users who are dependent on the telephone, which must provide for third party bill management;
- Mobile SMS access to the emergency services for users with hearing and/or speech impairments;
- Provision of bills and contracts in accessible formats for blind or visually impaired users; and
- An obligation to take reasonable steps to ensure that the services it provides in order to comply with GC15 are widely publicised, including in appropriate formats and through appropriate channels for disabled end-users.

6 Cross-sectoral requirements

We commissioned [desk research](#) intended to provide background context to the Rica-led qualitative research study *Inclusive Communications*. The qualitative study was commissioned to provide a comprehensive understanding of the quality of service offered by communications providers within the wider context of people's experiences of other large organisations. Examples of the types of organisations included in the discussion with research participants include communications providers, utility companies, NHS, large government departments e.g. Department of Work and Pensions, HM Revenue and Customs, Passport Office, and financial service providers such as banks and pensions providers.

From the desk research, reviewing the current regulations and standards relating to older and disabled people and the research conducted by regulators and the Citizens Advice Bureau, some general points emerge:

The role of the regulators. Citizens Advice commissioned research by the Centre for Consumers and Essential Services (CCES), University of Leicester - Tackling consumer vulnerability: regulators' powers, actions and strategies (2014)¹⁰. That research raises some questions about the current role of the regulators. It suggests that the focus of government and regulators on promoting competition has still left consumers facing difficulties and it asks what should be the balance between depending on market mechanisms and formal intervention.

"Much of the focus from government and regulators has continued to be based on promoting competition but this in itself has proved highly problematic and consumers still face significant difficulties in these services...The issue of which regulatory tools to use and the balance between them is a long standing issue within the theory and practice of regulation but continues to be a matter of debate." (p11)

It points to the need for the regulators to have in place an:

"...effective means of 'external auditing' that involves a range of relevant organisations which work with consumers in vulnerable circumstances. This could be done through the use of existing structures (such as the Financial Services Consumer Panel and Ofcom's Communications Consumer Panel and Advisory Committee on Older and Disabled People) or by setting up external 'challenge groups' for each regulator or jointly. This should

¹⁰ https://www.citizensadvice.org.uk/Global/Migrated_Documents/corporate/tackling-consumer-vulnerability.pdf

be underpinned by a clear mechanism so that external input is taken on board and seen to be so. This should not be a one-off exercise but one that becomes an integral part of the regulators' consumer vulnerability policies and monitoring." (CCES 2014, p7)

The role of companies. Citizens Advice point out that companies have different policies and practices which places the onus on the regulators to help drive forward good practice.

"Ultimately the success of the regulators in tackling consumer vulnerability revolves very much around the responsiveness of the companies. This means recognising that company behaviour and policies can greatly add to the risk of consumer vulnerability, and taking practical steps to eliminate poor practices and learn from good practice." (CCES 2014, p7)

The role of government. The Citizens Advice research raises a point about how consumers can fall between regulators, government and companies.

"While the regulators have a central role to play, government too has a critical role in tackling the causes and consequences of consumer vulnerability in these essential services. It is clear that there is often a gap between the expectations of consumers and the public about what regulators can do and their actual statutory powers. Wider social policy is seen as the responsibility of government but governments frequently leave key issues such as the affordability of essential services to the regulators and companies. The interests of consumers in these sectors are often in danger of being stranded between regulators, government and companies, with especially serious implications for people in vulnerable circumstances." (CCES 2014, p14)

Move towards co-operation between organisations and sharing learnings. There is a growing understanding of the need to have a co-ordinated response to the issues facing disabled, elderly and vulnerable people. Evidence of this is the establishment of the UK Regulators' Network and the Government's emphasis on identifying and sharing good practice, its Inter-Departmental Ministerial Group on Disability, the Disability Action Alliance and the support for Disabled People's User-Led Organisations.

Focus on vulnerability. While the focus of the *Inclusive Communications* research is on older and disabled people, it is worth noting that there is a move towards a more rounded understanding of consumer vulnerability across some of the regulators examined. This includes people who are vulnerable while not necessarily being elderly or classified as disabled. Regulators such as Ofgem have a consumer vulnerability strategy in place and Ofwat and the Financial Conduct Authority (FCA)

are also developing strategies in this area. The FCA published a strategy document¹¹ in February 2015.

Website accessibility. It is noticeable that a number of organisations have adopted an accessibility link into their home page which links to information on how to improve the page for people who have visual impairment. Many organisations adhere to the 'W3C'¹² guidelines which explain how to make web content accessible to people with disabilities.

There is a difference between many companies' policies and the older or disabled person's actual experience of service provision. Despite regulation and increasing government guidance, differences between companies remain in terms of how accessible they are to older and disabled consumers and the customer service they experience. This can only be fully assessed through specific consumer research such as the recent Ofcom Mystery Shopping research in the communications market.

In the qualitative research carried out for the Panel and ACOD by Rica, consumers mentioned what appeared to be a more proactive approach by energy providers. In the desk review of cross-sectoral regulation, we noted particularly the requirements for energy companies related to the Priority Services Register - a licence requirement under the Electricity Act 1989;

- Energy suppliers and network operators are under an obligation to establish and maintain a Priority Services Register (PSR) which includes a list of all disabled customers who have requested registration.
- All customers on the PSR must be provided with advice and information on the associated services available to them and suppliers' additional obligations to PSR customers.
- Suppliers are obliged to notify all customers of the existence of, and process for becoming registered on the PSR.
- If requested by a PSR eligible customer, suppliers are required to provide specific services such as moving the customer's meter or carrying out quarterly meter readings where the customer is unable to read or access the meter.
- If requested, suppliers are also required to provide billing information in an accessible format for blind or partially sighted customers.

¹¹ <http://www.fca.org.uk/news/occasional-paper-no-8>

¹² The World Wide Web Consortium (W3C) is an international community that develops open standards to ensure the long-term growth of the Web.

- Suppliers must provide, free of charge, facilities which allow customers who are blind, partially sighted, deaf or hearing impaired to ask or complain about any bill or statement of account.
- A ban on winter disconnections of households where someone is chronically sick or disabled; and
- There is also a broader safety net established by the Energy Retailers Association that all the major energy suppliers subscribe to which should prevent any disconnections of vulnerable households.

In the communications sector, communications providers have an obligation to take reasonable steps to ensure that the services provided in order to comply with GC15 are widely publicised, including in appropriate formats and through appropriate channels for disabled end-users. The requirement placed upon energy providers to inform *all* customers of the existence of the priority service register and the process for becoming registered on the PSR is a positive step that ensures customers are aware of the register and what it can offer.

In our view, the promotion of GC15 services and equivalent access channels to *all* customers would have many benefits - raising awareness throughout the customer base and not just amongst people directly affected - and potentially helping to avoid the discomfort that some people experience as a result of having to state their needs, sometimes repeatedly, to organisations.

Relevant resources are also available - the Direct Marketing Association's Contact Centres & Telemarketing Council has published *Guidelines for call centres dealing with vulnerable consumers*¹³ - a set of guidelines for contact centres and companies engaged with telemarketing giving practical guidance on how to identify and manage a call with someone they believe is unable to make an informed decision, such as those living with dementia or mental health issues. The guidelines set out step-by-step, the signs to look out for to identify a vulnerable consumer and how best to communicate with them.

Older and disabled consumers are not a homogenous group and have a range of different needs, some more complex than others. However research from other stakeholders emphasises the loss that a business can suffer by not being disability aware. New research into the consumer preferences of disabled customers has been conducted by the Extra Costs Commission in collaboration with Business Disability Forum (BDF).¹⁴ Collaborating with the Extra Costs Commission - which has examined and made recommendations about how to reduce the 'extra costs' that disabled customers and households face as a direct result of disability (e.g. higher transport, energy and insurance costs) - BDF was able to integrate updated

¹³ http://www.dma.org.uk/uploads/55c9b50f80d28-guidelines-for-dealing-with-vulnerable-consumers-august-2015_55c9b50f80c7b.pdf

¹⁴ <http://businessdisabilityforum.org.uk/about-us/news/walkaway-pound-report-2015/>

'walkaway pound' research into the Commission's consumer survey that more than 2,500 disabled people engaged with.

At the time of the interim report launch in March 2015, BDF highlighted that headline figure of £1.8 billion per month being lost to businesses as disabled customers and their families and friends 'walked away' from service providers that were not disability smart. That research found that more than three in four disabled customers and their families and friends had moved their business elsewhere as a result of a lack of disability awareness by specific service providers. The Commission's latest research asked people whether they had left a shop or business because of poor disability awareness or understanding: three quarters (75%) of disabled people and their families said that they had done this (75% of disabled people and 76% of parents or carers). Looking at this across impairment, the percentage of people who have left a business can reach 83%. In particular, 83% of those with memory impairment, 81% of those with a behavioural impairment, 81% of people with autism and 79% of those with a learning disability said they had left a business for this reason.

George Selvanera, Director of Policy, Services and Communications at BDF advised any service provider wanting to make improvements to the accessibility of their service, "to capture the views of disabled and older customers about how they currently experience your service and ask for their suggestions for improvement." The research found that key issues for disabled, and indeed older, customers in dealing with the energy sector included:

- ensuring customer facing staff are skilled and confident in interacting with customers with different disabilities and impairments. This includes interacting with customers with non-visible disabilities such as dementia and mental ill health;
- ensuring the digital interface is straightforward and wholly accessible to customers with all types of disabilities and impairments. Empathy needs to be built into digital design processes, including compatibility with adaptive technology, for example screen readers and ensuring that apps can be used by people with arthritis. At a minimum, this requires meeting W3C guidelines for web accessibility, but usability goes further and points to the value of engaging customers with different disabilities in design and testing processes;
- ensuring accessible communications are provided that make customers with different disabilities aware of the different energy schemes available for them, and about tariffs generally.

The voluntary standard *BS 18477: 2010 Inclusive service provision* was developed to help organisations better design, market, assist and deliver services to all consumers. The underlying theme of the standard is identifying and responding to

consumer vulnerability but the standard also tackles issues such as providing responsible business practices and accessible systems, such as websites and contact centres. The BSI has also published a white paper for service providers - *Providing fair, flexible and inclusive services - a business perspective*¹⁵.

The Employers' Forum on Disability has also published *Your call is important to us - Improving access to contact centres*.¹⁶ The guide provides a set of best practice guidelines for organisations to adopt when devising call routing systems and providing contact centres that are accessible to all. The guide incorporates a step-by-step action plan highlighting the business benefits of making reasonable adjustments.

¹⁵ <http://www.bsigroup.com/LocalFiles/en-GB/customer-service/BSI-Providing-fair-flexible-and-inclusive-services-a-business-perspective-EN-UK.pdf>

¹⁶ <http://www.businessdisabilityforum.org.uk/advice-and-publications/publications/your-call-is-important-to-us/>

7 Ofcom Mystery Shopping: Information on telecommunications services for disabled consumers

In August 2015, Ofcom published the results of mystery shopping about information on telecommunications services for disabled consumers.¹⁷ This revisited research carried out in 2010. The results suggested that disabled consumers may not consistently be getting the information they need via in-store, online or telephone interactions in order to find out about the services that are available to them. We agree with Ofcom that this gives rise to a serious concern that there is a risk of significant consumer harm within the UK communications market.

Ofcom has now commenced a six-month monitoring and enforcement programme to assess the steps that communications providers are taking to ensure that the services which they provide to users with disabilities, as required under GC15.1 to 15.9, are widely publicised. This programme will also take into consideration the need for communications providers to disseminate information in appropriate formats through appropriate channels for those users.

In relation to the provision of information about 'key services', the mystery shopping study found that the proportion of telephone mystery enquiries where the advisors spontaneously gave at least one piece of information on a key service relating to GC15 was as follows for the different scenarios: blind/visually impaired scenario 56%; deaf/hearing impaired scenario 48%; cognitive or long term health issues scenario 50%. With further prompting from the mystery shoppers, the provision of information increased to between 71% and 84% of mystery shopping enquiries across the different scenarios.

Since the 2010 mystery shopping, the spontaneous provision of information on key services has significantly increased for the cognitive or long term health scenario (from 40%), while the spontaneous provision of information relating to the blind/visually impaired scenario has decreased (from 69% to 56%).

For all enquiries, telephone yielded more specific information about key services relevant to the scenario provided, compared to online or in-store enquiries. This is of particular concern, given that our research has identified that some older and disabled consumers specifically choose to contact their communications providers online or in-store as they find these channels more accessible than via telephone.

¹⁷ http://stakeholders.ofcom.org.uk/binaries/research/telecoms-research/mystery-shopping-disabled-consumers/Disability_charts_2015.pdf

Looking across all of the mystery shopping, scenarios and contact routes, BT, Virgin Media, Sky and Vodafone appear to be the providers most likely to provide specific information on the 'key services'.

The data also shows that on average (across all providers, scenarios and contact methods) the communications provider's specific *disability/accessibility team*¹⁸ was mentioned to the mystery shopper in 20% of mystery shopping enquiries; a similar level compared to 2010. Sky and Vodafone in particular mentioned their disability teams in around 3 in 10 mystery shopping enquiries.

The mystery shopping exercise separately recorded if *any referral* on to other contact methods/info sources was mentioned (e.g. website, telephone number, email address, leaflet). On average across all providers, scenarios and contact methods, in 41% of mystery shopping enquiries some sort of referral on was made. In particular, in 25% of mystery shopping enquiries the referral was to a website and in 20% it was to a telephone number. Sky, Vodafone, BT, Virgin Media and EE all made a referral in 40% or more of their mystery shopping enquiries.

Looking at the different contact routes separately also shows that levels of referrals differ by the method of enquiry; 37% for telephone calls, 46% for online contacts and 67% for in-store visits. This mirrors the finding that enquiries over the telephone tended to yield more specific information about key services compared to in-store and online contacts.

Blind/ visually impaired scenario

Telephone

The proportion of telephone enquiries using a blind/visually impaired scenario where the advisor gave information or advice seen to be relevant or appropriate to the enquiry without specific prompting was 77% (and increased to 91% with further prompting). BT, Sky, Vodafone and EE gave at least one piece of relevant information spontaneously in at least 8 in 10 telephone mystery shopping enquiries.

TalkTalk gave at least one piece of relevant information spontaneously in just over half of the telephone mystery shopping enquiries.

However, the proportion of telephone enquiries using a blind/visually impaired scenario where the advisor gave at least one piece of information on a key service (without specific prompting) was at 56%. This has decreased from 69% in 2010. BT, Virgin Media, Sky and Vodafone gave at least one piece of information about a key

¹⁸ It should be noted that not all communications providers have a specific disability/accessibility team

service spontaneously in at least 6 in 10 telephone enquiries (although for Vodafone this is a dip year on year, which is also recorded for O2).

EE gave at least one piece of information about a key service spontaneously in just over a third of mystery shopping enquiries.

After shoppers prompted the communications provider advisor further with some of the specific types of mandated service, 84% of advisors mentioned or gave information about at least one relevant service. This has decreased from 92% in 2010. There was no significant decrease for any individual communications provider.

Online and in-store

Online provision of information on the key services was lower than by telephone, both at the initial enquiry (28% vs. 56%) and after some prompting (32% vs. 84%). In-store provision of information on key services was also below the level for telephone (36% initially and 59% prompted).

However, it should be noted that some communications providers referred the mystery shoppers to make contact in a different way or contact the disability team directly, e.g. 24% of in-store enquiries had a referral to a specific disability/accessibility related contact on the telephone. Online 13% of enquiries resulted in a referral to a specific disability related contact on the telephone and 17% referred the mystery shopper to information on the website.

Deaf/hearing impaired scenario

Telephone

The proportion of telephone enquiries using a deaf/hearing impaired scenario where the advisor gave information or advice seen to be relevant or appropriate to the enquiry without specific prompting was 72% (this increased to 83% after further prompting). BT and EE both gave at least one piece of relevant information spontaneously in 8 in 10 telephone mystery shopping enquiries.

TalkTalk gave at least one piece of relevant information spontaneously in half of the telephone mystery shop.

Around half (48%) of the telephone shoppers were told about at least one key service spontaneously, similar to 2010 (50%). BT, Virgin Media, Sky, Vodafone and O2 gave at least one piece of information spontaneously in just over half the enquiries.

When additionally prompted for information on mandated services not mentioned spontaneously by the advisor, 71% were given at least one piece of information on key services, similar to 2010 (68%).

In particular, the proportion of telephone shoppers recording being told about the text relay service (after prompting) increased from 44% in 2010 to 58% in 2014. The proportion of enquiries that produced information about 'special tariff/money back scheme' also increased from 6% to 15%.

Online and in-store

Online enquiries relating to hearing impairments were less likely to yield advice relating to the key services than enquiries over the telephone. This was true at a spontaneous (32% vs. 48%) and prompted level (35% vs. 71%).

In-store enquiries relating to hearing impairments yielded broadly similar levels of advice relating to the key services as enquiries over the telephone: 45% spontaneous, 61% prompted.

Cognitive or long term health issues scenario

Telephone

The proportion of telephone enquiries using a cognitive or long term health issues scenario where the advisor gave information or advice seen to be relevant or appropriate to the enquiry without specific prompting was 59% (and increased to 83% with further prompting). BT and Vodafone both gave at least one piece of relevant information spontaneously in at least 7 in 10 telephone mystery enquiries.

TalkTalk, Three, O2 and EE gave at least one piece of relevant information spontaneously in around half of the telephone mystery shopping enquiries.

Half (50%) of telephone shoppers using a cognitive or long term health issues scenario were provided with at least one pieces of information about key services without specifically prompting for it. This represents an increase from 40% since the mystery shopping in 2010, with Virgin Media and Vodafone both having improved significantly (30% to 63% and 30% to 67%).

With specific prompting, provision of information about key services via the telephone reached 80%. This is less than in 2010 (87%).

Specifically, three in four provide information about third party account management.

Online and in-store

Online enquiries were less likely to yield information on key services compared to enquiries made over the telephone, both at the initial enquiry (33% vs. 50%) or in total (45% vs. 80%).

In-store shoppers were more likely than online to record the provision of information on key services at 47% initially, 68% in total.

8 Our recommendations

The Panel's driving force continues to be our belief that, given the increasingly central role of communications in people's lives, society and the economy, it is vital to support fully the communications needs of all consumers, citizens and micro businesses.

Consumers, citizens and micro businesses are more reliant than ever on communications services. Ofcom's 2015 Communications Market Report¹⁹ noted that 'technology has changed the way we communicate, and for the most part is making life easier. Seven in ten (69%) internet users agree that 'technology has changed the way I communicate' and six in ten (59%) agree that 'new communication methods have made my life easier'. Digital communications are seen to bring benefits. Almost two-thirds (64%) of online adults agree that being online is 'invaluable for keeping me informed about current issues', and six in ten (60%) agree that it helps them keep in touch with close family and friends. Just over half (52%) agree that it 'inspires me to try new things'.

In the Panel's view, any sub-optimal delivery of communications services has ceased to be a cause of irritation for individual consumers and micro businesses - it is now an issue of real and significant detriment.

Two main facets of communications services are access to the technical product or service itself; and the customer care related to its provision from a communications, or other, provider. In terms of access to and use of the product or service, the publication of the results of Ofcom's large scale quantitative research on disabled consumers' access to and use of communication services²⁰, carried out as part of the British Population Survey's (BPS) Household Survey, is informative. It highlights that although progress has been made since the last similar survey was carried out in 2012, access to communication services such as the internet and mobile phones is generally lower for consumers with a disability than for those without, even when demographic factors have been taken into account. A fifth of disabled consumers said their disability prevented their use of at least some communication devices and services, with differences seen among consumers with different types of impairment.

The qualitative research we commissioned and Ofcom's mystery shopping research about information on telecommunications services for disabled consumers combine

¹⁹ <http://stakeholders.ofcom.org.uk/market-data-research/market-data/communications-market-reports/cmr15/>

²⁰ <http://stakeholders.ofcom.org.uk/market-data-research/other/cross-media/disabled-consumers-ownership-comms-services/Disabled-consumers-use-of-communications-services/>

to form a powerful evidence base which strongly suggests that some older and disabled consumers are not receiving the quality of customer service to which they are entitled from their communications providers. This is unacceptable. To enable consumers and citizens to benefit from the opportunities offered by modern communications services, it is vital that they are appropriately supported to do so.

The consumer experiences outlined in those research reports highlight a number of systemic issues, along with opportunities for improvements. The recommendations below seek to address those issues, providing tangible steps for providers to take to not only improve the experience of older and disabled consumers, but to increase the attractiveness of their businesses to those people.

Our Recommendations

1. Recommendations for communications providers and Alternative Dispute Resolution (ADR) services

a) Enhance customer service

- Provide a service that provides equal access to all users regardless of any impairments they have
- Allow consumers to communicate in the way that best suits individuals' needs and abilities
- All staff - and especially contact centre agents - should have disability training so they understand people's situations and the equipment they may be using
- Customer service agents must use clear language and be trained and empowered to depart from scripts when necessary
- Develop and promote a culture that exemplifies offering a flexible solution and taking extra time to explain details when required
- Seek the views of disabled and older customers on their experience and ask for their suggestions for improvement

b) Match communications systems and processes to individual needs

- Communications providers and Alternative Dispute Resolution (ADR) services should both ensure contact channels are inclusive or provide and promote alternative, appropriate, equivalent methods of access and communication
- Ensure that all customers can easily use customer service systems - including making a complaint - and monitor that this remains the case
- Call steering menus should have no more than three options and if the customer doesn't select any option, the call should go to an agent rather than be disconnected
- Ensure that people using assistive technologies can contact customer services without being disconnected

- Keep a record of needs and ensure that all contact is in a suitable/accessible format, including outgoing as well as incoming communications
- Maintain clear records of previous contacts with the consumer

c) Have a dedicated disability team

- Explore ways to identify customers who need extra help and get them to the right place quickly
- Provide a dedicated person or team to deal with disabled customers
- Offer specialist access routes - designed with and around people who are going to use them
- Relevant customers should be routed direct to these specialist teams via provision of a specialist number or transferred to the team by an agent
- Specialist routes need to be signposted
- Offer flexible third-party arrangements, including the possibility of multiple pre-arranged registrations, so other people can assist the account holder²¹

d) Better promote equivalent access channels/ GC15 service provision

- Inform all customers of the existence of alternative access channels and the services and rights available under GC15 - especially the priority fault repair register and the safeguard scheme, including third-party bill management.
- Actively promote services and rights of equivalent access in line with GC15 and make these rights explicit in communications
- Ensure full operational compliance with GC15
- Proactively offer equivalent access channels

2. Recommendations for consumers

- Understand the impact of choosing to disclose, or not, your disability/situation and any equipment you use
- Be aware of your rights under General Condition 15 (See Section 5 below) and any additional services for disabled people offered by your provider
- If appropriate and you are eligible, register for the Priority Fault Repair Service
- Be specific about your needs and what you want provided
- Shop around and consider switching provider
- Use complaints procedures, up to and including Alternative Dispute Resolution, if you are not happy with the service you receive

²¹ Requiring the customer to nominate a third party in advance is intended to reduce the risk of fraud

Communications Consumer
Panel and ACOD

Riverside House
2a Southwark Bridge Rd London
SE1 9HA

contact@communicationsconsumerpanel.org.uk

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