A guide to publicising services available to disabled users

Contents

1. Overview

Regulated providers should ensure that all consumers are able to obtain clear, accurate and relevant information regarding the services available to disabled people. Consumers may require this information for themselves, as carers to others, or to understand what is available for friends or family.

Regulated providers should also ensure that this information is made widely available through different channels, for example, on the company's website and on the phone. This includes being able to effectively and efficiently respond to any enquiries about the services for disabled people. They should inform consumers of the relevant services and support available which can make it easier for disabled people to access and manage their accounts and services.

This guide sets out the reasonable steps we expect regulated providers to take to ensure that the special measures available to disabled people are widely publicised, taking into consideration the need to disseminate information in appropriate formats through appropriate channels.

Ofcom may take account of this guide when assessing whether a regulated provider is meeting its obligations under the relevant rules. It remains open for regulated providers to consider taking other reasonable steps (not in this guide) which would fit better with their own systems/processes but achieve the same effect.

This guide also includes examples of good practice.

This guide has been updated to reflect changes made to the General Conditions of Entitlement up to 17 June 2022. Reference has been made to new measures, as well as to changes to the definitions and numbering.

2. Purpose of this guide

Introduction

2.1   Communications services are important for all citizens and consumers, including disabled people. Access to such services is increasingly necessary to engage in everyday activities.

2.2   Disabled people are active users of communications services, and indeed may be more reliant on certain communications services.[1] For example, they may be more reliant on online shopping or telephone banking if their disability makes using the high street more challenging. They may find it particularly important to know that they can phone for help if in difficulty or in an emergency. However, disabled people may need changes to the way in which a service is provided in order to be able to benefit from it and use it independently.

2.3   Ofcom has a duty under the Communications Act 2003 to promote the interests of citizens and consumers and, in so doing, to have special regard to the needs of particular groups including those with disabilities.

2.4   An example of where Ofcom has stepped in to facilitate participation and social inclusion are the setting of the rules in the General Conditions of Entitlement (in General Condition C5 or "GC C5") relating to the provision of services for disabled people.[2]

Regulatory rules

2.5   Under GC C5.6, regulated providers must take the measures needed to meet the needs of end-users with disabilities and take all reasonable steps to ensure that such measures are widely publicised, taking into consideration the need to disseminate information in appropriate formats through appropriate channels.

2.6   Below we briefly state the measures for disabled people (see GC C5.7 to C5.16 for detail):

- Access to directory information for end-users who are unable to easily use a printed directory due to visual impairment or other disabilities, with through-connection of calls.
- Access to an approved relay service for end-users with disabilities that mean they need to make or receive calls in which some or all of the call is made or received in text format.[3]
- Access to emergency SMS (mobile only) for end-users with hearing or speech impairments.

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[1] Research by the Communications Consumer Panel found that communications services can have a 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.

[2] Some requirements are derived from the Universal Service Directive,such as Article 7 and Article 26(4).

[3] Ofcom approves relay services based on published criteria, e.g. speed of service and confidentiality of communication.

- Access to an approved emergency video relay service for deaf British Sign Language ("BSL") users to contact the emergency services.[4]
- Priority fault repair (landline and fixed broadband) for disabled end-users who have a genuine need for an urgent repair.
- Third party bill management, enabling a nominee to act on behalf of a disabled subscriber who needs help to manage their affairs.
- Communications in an accessible format such as large print or Braille on request.

Purpose of this guide

2.7 This guide is intended to support regulated providers in meeting their obligation under Ofcom's rules to widely publicise the services they are required to provide for disabled people. The overall aim is to ensure that disabled people are readily able to find out about services available for them.

2.8 It focuses on the steps that, as a minimum, Ofcom consider it would be reasonable to expect regulated providers to take to ensure that special measures for disabled people are widely publicised. This includes publishing clear and easy to find information on their websites, as well as pro-actively providing accurate advice when speaking to customers on the phone and in retail stores where appropriate.

2.9 The different sections in this guide are not mutually exclusive; in most cases, there is significant overlap and/or linkages. For example, staff training is important to enable identification of disabled consumers as well as ensuring that customer enquiries are dealt with accurately and effectively.

2.10 The guide also includes examples of good practice in this area. These examples are not intended to be prescriptive requirements for compliance with GC C5.6, but instead to assist regulated providers in considering what suite of measures to adopt to lead to positive improvements and better outcomes for consumers. We also note that good practice develops over time, and it is important to emphasise the need for regulated providers to keep up to date with developments that occur following publication of this guide to ensure continuing improvement.

2.11 One specific example of good practice we have noted is for regulated providers to have a champion/sponsor at a senior level within the organisation with overall responsibility for accessibility issues, and the ability to challenge the organisation to do more for disabled people. Drawing on relevant internal expertise, e.g. product managers, lawyers, disability champions, the sponsor can drive the organisation towards a culture where accessibility thinking is established into business as usual practices. This should help regulated providers ensure that the needs of disabled people are taken account of in any initiatives

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[4] Ofcom approves emergency video relay services based on published criteria.

and across all operations; and also for staff at all levels to understand their role in helping the organisation meet its obligations and responsibilities towards disabled people.

2.12   This guide is not legal advice on how regulated providers should comply with GC C5.6.[5] Nor does it constitute a prescriptive set of rules in addition to GC C5.6; we would consider any alleged breach of GC C5.6 on its merits. However, Ofcom may take account of the reasonable steps as set out in this guide when assessing whether a regulated provider is meeting its obligations under GC C5.6. It remains open for regulated providers to consider taking other reasonable steps (not in this guide) which would fit better with their own systems/processes but achieve the same effect.

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[5] Regulated providers should seek their own independent legal advice on how to meet their obligations under the relevant regulatory rules and other legislation.

3. Staff training

3.1   It is important for front-line staff (e.g. customer service agents and retail store advisors but excluding technicians) to have sufficient training to handle queries about the services available to disabled consumers. They should know where and how to find information to answer a query accurately and quickly. If they are not able to answer the query themselves (or are only required to refer the customer to a dedicated specialist team – see good practice below), they should know where internal expertise lies and how and when to refer on to ensure that all queries are handled effectively and efficiently.

3.2   While we would expect regulated providers to be able to assess the most effective way to train their staff, generally, we consider it would be reasonable to expect training for the relevant front-line staff to include the following elements:

- how to identify consumers for whom accessibility services may be relevant (including where their needs may have changed). For example, to listen out for key words, phrases etc. and to ask further questions, if necessary, to understand whether a customer has any accessibility issues;
- the services available for disabled people, in particular the special measures the regulated provider is required to provide under Ofcom's rules in GC C5 and where to find the relevant information about them;
- who each special measure is intended to help, in order to be able to identify all services available to help people with different impairments and communicate this effectively to consumers;
- an understanding of how assistive technology works (e.g. text relay, video relay) for staff who may be in contact with customers using those methods;
- where relevant, when and how to refer a query to other parts of the organisation (e.g. a specialist team and/or specialist advisors) if they are not able to answer the query themselves; and
- the importance of knowing all the above so staff understand their role in helping the organisation to meet its obligations and responsibilities towards disabled people as required in relevant legislation and regulations, and also in providing a good customer experience.

3.3   Given that services for disabled people may evolve over time, it is reasonable to expect there would be:

- refresher training and/or other refresh activity such as briefings, seminars, desk drops for front-line staff at regular intervals to ensure that their knowledge of the services available to disabled people is fresh and up-to-date; and
- training and/or updates for all relevant front-line staff prior to any significant changes to the services available for disabled people, for example, when the new rules on Next Generation Text Relay ("NGTR") took effect in April 2014.

Good practice

3.4 It is considered good practice to have dedicated specialist teams to deal with enquiries about products and services available to disabled customers.[6] The staff in such teams should be provided with adequate training to support them in advising disabled consumers, and should be empowered to offer flexible solutions to customers who require special assistance. This helps to ensure that any queries about specific needs are handled effectively, especially as it is likely the majority of front-line staff may have limited experience in this area. Of course, where there are specialist teams, it is still important to ensure non-specialists are equipped to identify when it is appropriate to pass enquiries to them.

3.5 It is also considered good practice to include relevant training on accessibility issues in staff development plans, keep a central record of training and refresher training that has been completed and take follow up action for any non-completion. This would emphasise to staff the importance of the training to their role when representing the organisation.

3.6 Where a customer uses assistive technology, for example text relay or video relay, to contact their provider, the relevant front-line staff should receive training on what to expect and how to confidently interact with customers. As an example of good practice, the training module of one provider included a playback of a text relay call to show staff how it worked and prepare them for what to expect if a customer contacted them using that method. The training also gave practical tips on how to speak to customers who are using text relay.

3.7 Regulated providers should consider engaging with disabled people or their representative groups in the design and/or delivery of relevant staff training. This is likely to help regulated providers in providing appropriate and useful training to help staff understand the needs of disabled people and how to best engage with those consumers. It is also likely to be useful in supporting staff to overcome any concerns they may have with speaking directly to disabled people and/or about disabilities. As an example of good practice, one provider sought advice and support from the Business Disability Forum when creating and refreshing its disability awareness training.

3.8 Regulated providers should also consider including an interactive element in the training to test the learning is effective, for example, a quiz at the end of the training which individuals are required to "pass" in order to complete the training. As an example of good practice, one provider monitors employees' success rates to an end-of-module test to identify if further training is required.

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[6] Dedicated disability teams are also recommended in a report by the Communications Consumer Panel following qualitative research which explored how accessible communications providers are to customers with additional communication support needs, such as people with disabilities, and older consumers.

4. Resources for staff

4.1   Front-line staff may only be asked about accessibility issues on an infrequent basis. It is therefore important that they are provided with easy-to-access resources/reference materials which are clear and up to date to help them respond to any queries they get.

4.2   We consider it would be reasonable to expect regulated providers to undertake effective and periodic reviews of:

- all relevant staff training material to ensure that the information on services available to disabled people is up to date; and
- all relevant reference material/resources available to staff about accessibility (such as call-handling scripts, intranet, knowledge management system, internal guidance/handbooks, accessibility website and so on) to ensure that the contents are useful and up to date.

4.3   We also consider it would be reasonable to expect a process to be in place to ensure that all resources are updated prior to any known significant changes in the services available to disabled people (e.g. when the requirement to provide the NGTR took effect in 2014).

4.4   There should also be a process in place for regulated providers to ensure that the information included in staff training and reference materials is consistent with the information provided to consumers. This should help with the handling of any enquiries as staff and customers will be reading the same or similar information and using terminology which is familiar to all.

4.5   Of course, it is also important that all information about GC C5 services in staff training and reference materials accurately reflects what is required in the regulatory rules and enables staff to identify the special measure(s) relevant to the customer's needs.

Good practice

4.6   Where staff access online resources (e.g. intranet or company website) to find relevant information about the services available for disabled customers, regulated providers should consider having a comprehensive list of key words which bring up the relevant information when entered into a search function. A non-exhaustive list of key words is in Annex 1. Regulated providers should consider consulting with relevant user groups to help identify the key words and phrases that disabled people and their carers, helpers or relatives are likely to use or prefer to use when discussing their needs, and to seek feedback from staff in order to ensure this list is useful and remains up-to-date.

4.7   Regulated providers may also wish to make available other guidance materials for staff to advise disabled customers effectively. As an example of good practice, one provider has produced a guide highlighting the useful features on devices for customers with visual,

hearing, cognitive or dexterity difficulties. The guide is aimed at helping front-line staff advise disabled customers on devices suitable for their needs.

4.8   It is also considered good practice for regulated providers to review whether staff have adequate resources to respond effectively to queries about services for disabled people. For example, regulated providers could ask front-line staff for feedback on the resources/reference materials to assess how useful those materials are, how they could be improved and to find out whether there is anything else that could help them to provide a better service when responding to customers.

Good practice: capturing specific needs

4.9   Not all disabled people will wish to highlight their disability and/or specific needs each time they call. Where they have disclosed that information, regulated providers are required to have policies/procedures in place on how those needs will be recorded. This would enable front-line staff to identify and/or understand the specific needs of that customer without the need for the customer to highlight the point again. All such information would, of course, need to be recorded and maintained in line with data protection principles and the relevant advisors would need to be trained on when and how to use the information logged.

4.10   Regulated providers should also consider how they can encourage their customers to inform them of any relevant accessibility issues (including where their needs have changed). For example, regulated providers may wish to encourage their customers to register any specific needs by completing an online form or by logging into and making a note on their online account.

4.11   Subject to data protection principles, regulated providers may also wish to ask customers if they have any communications preferences. Keeping a record of this is likely to help regulated providers to tailor any key future communications to the customer.

5. Information for consumers

5.1   We consider it would be reasonable to expect that information about the services and support available to disabled people should be easy to find and made widely available, and that it should be clear, accurate and relevant.

5.2   Many disabled consumers or their friends, families and carers are likely to look on a company's website to find information. Most regulated providers have a dedicated website or a dedicated section of their website on accessibility issues.[7] These should, as far as practicable, be readable by people with visual impairments using a range of screen readers.

5.3   This information is only useful if consumers are able to find it. It is therefore reasonable to expect regulated providers' accessibility website/webpages to be clearly and effectively sign-posted for customers. For example, a link to accessibility information should be easy to find via the homepage and when using the help and search functions of the provider's website. The functions should also respond appropriately to key words and phrases, and direct readers to the relevant information (see Annex 1 for a non-exhaustive list of key words).[8]

5.4   Such information is also, of course, only useful if it is accurate. It is therefore reasonable to expect regulated providers periodically to review the accessibility information on their website to ensure that it is up-to-date and accurately reflects the services available to disabled people, including the requirements in GC C5. The information on the website should also be consistent with the information used by front-line staff to respond to any queries about accessibility issues.

5.5   Not all customers will have access to the internet, and others may have particular difficulties related to their disability in using their regulated provider's website as an information source. It is therefore important that relevant information about the special measures for disabled people is made available in different formats and through different channels (noting GC C5.6 refers to "appropriate channels" and "appropriate formats" in the plural).

5.6   In order to ensure that disabled people are able to get the help and support they need, they may need to contact a provider using alternative channels. It appears reasonable to expect regulated providers to publicise the different ways in which customers can get in touch with them to find out more information. For example, this could include the availability of text relay and/or video relay services in addition to telephone and email. Of

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[7] For the purpose of this guide, we consider the accessibility website/webpage to be where consumers can find information about the services available to disabled people (e.g. the special measures in GC C5) rather than just where consumers can adjust font size, contrast etc. in order to view the information on the company's website. However, it is equally important for all of this information to be clear and accessible to all customers.

[8] For example, that typing in the word "disabled" brings up information about services for disabled people prominently.

course, people can only use such methods if they know about them and, to that end contact methods should be easily accessible to all (e.g. published on the "Contact Us" page of the company's website and in relevant customer communications).

Good practice

5.7   Regulated providers should consider ways to make their company website and/or accessibility website/webpages more useful for disabled people. For example:

- by adhering to the latest Web Content Accessibility Guidelines (WCAG), which cover a wide range of recommendations for making web content more accessible;
- by having a "Browsealoud" function on the accessibility web pages so the text can be read out to those with difficulty reading;
- by adding subtitles to any support videos on their website to help those with hearing impairments;
- by providing support videos using BSL.

5.8   Customers who do not manage their accounts online are likely to receive hard copy communications from their regulated providers. Therefore, regulated providers should consider including details about where and how consumers can find more information about the services and support available to disabled consumers on relevant customer communications such as welcome letters and/or regular newsletters, booklets and leaflets.

5.9   Where a regulated provider has been advised that a customer requires communication in an alternative format, the regulated provider should ensure that any key future communication material is sent to the customer in that format.

5.10   Regulated providers should consider proactively contacting consumers when there is a significant change in a service offered to disabled people. It should consider identifying the consumers most likely to be affected by the change(s) and/or their representatives and make contact via appropriate channels.

5.11   Regulated providers should consider engaging with disabled people or their representative groups in the design and delivery of customer communications, including the company's website, at regular intervals in order to take account of any specific needs. This is likely to help regulated providers produce communications that are suitable and effective in reaching and helping the intended audience. As an example of good practice, a number of regulated providers are active members of the Business Disability Forum (BDF) and seek advice and guidance from the Forum when reviewing their websites.

5.12   Regulated providers should consider different ways to engage with, and communicate the services available to, disabled people. For example, communicating via information providers[9] and/or working with consumer groups and charities to provide information, education and tools for disabled people. These could include events for older and disabled

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[9] For example, Living Made Easy.

people and their relatives or carers, events for health and social care professionals and through mainstream and specialist publications. As examples of good practice, a number of regulated providers consult with charities (such as RNIB and RNID) to extend the reach of their accessibility services and to explore new development opportunities.

5.13   Regulated providers should consider making available and/or making reference to additional useful advice for disabled people. For example:

- guides on suitable handsets, devices and apps;
- guides on handset accessibility functions; and
- a link to the Global Accessibility Reporting Initiative website, which helps consumers find a device with accessibility features that works best for them.

Good practice: routing of consumer queries

5.14   Regulated providers should consider having a dedicated phone number and other dedicated contact routes for customers with accessibility queries to get in touch. This will help regulated providers identify customers who may need special assistance and also ensure that the query is dealt with by the appropriate team/member of staff, especially if the regulated provider has a specialist team to respond to all queries about accessibility issues. It is important that customers are able to find the contact information easily.

5.15   Research published by the Communications Consumer Panel in December 2015 highlighted that systems-related issues such as passwords and call routing systems can act as barriers to inclusion. This research recommends that call steering menus should have no more than three options and, if the customer does not select any option, the call should go to an agent rather than be disconnected.

5.16   Regulated providers should therefore consider reviewing their call routing systems to ensure that disabled people are able to get through to an agent in order to receive the help and support they need. As an example of good practice, one provider is able to flag the telephone numbers of customers with specific needs so that any calls received from that number is automatically routed to the specialist team.

6. Monitoring performance

6.1 In order to ensure that the needs of disabled customers are being met, it would be appropriate for regulated providers to monitor and evaluate their performance in this area on a periodic basis, in particular their compliance with the requirements in GC C5. This should help regulated providers identify any improvements that may be needed.

6.2 Monitoring activity could include:

- assessing the quality of information provided by, and the effectiveness of, front-line staff when responding to queries or complaints about the special measures for disabled people;
- assessing the effectiveness of the systems/processes in place to flag disabled consumers to ensure that the information recorded is relevant and being used for the purposes in which it was intended;
- assessing the effectiveness of information available to consumers and front-line staff about accessibility.

6.3 Where monitoring identifies potential improvements, clearly it would be appropriate for follow-up action to be taken within reasonable timescales.

Good practice

6.4 Regulated providers should consider monitoring the accuracy and quality of information given to disabled customers through mystery shopping or other suitable means and/or listening to call recordings. Some regulated providers already do this, for example using speech analytics software to identify call recordings where the customer may have a disability or require special assistance.

6.5 Where regulated providers have a created a specialist team to deal with queries about accessibility issues, they should consider monitoring the volume of, and time taken to answer, calls received by the team to ensure that it is appropriately resourced as appropriate.

6.6 Other examples of good practice in relation to monitoring activity include:

- Having a quality assurance (QA) function in the dedicated specialist team where there is coaching and feedback between QA coaches and call handling staff.
- Carrying out periodic audit checks of advisors' knowledge through questioning by a compliance team.

6.7 Regulated providers should consider engaging with disabled people and/or their representative groups to seek feedback on their customer communications (in addition to the design and delivery). This should help providers identify if any improvements are required. Examples of good practice include:

- consulting with disabled people on the accessibility information on the company's website and customer literature;
- following up any complaints from consumers flagged as having an impairment or requiring accessibility support to find out the root cause of complaint, including assessing the accessibility of the company's complaints procedure;
- carrying out a review of how to make improvements to the customer experience from disabled users' perspective.

6.8   Regulated providers should consider creating an environment for their staff to share good practice and make suggestions for improvements on how to deal with disability issues. As an example of good practice, some regulated providers have set up internal forums for customer service advisors to discuss and share their experiences of supporting and advising disabled people.

6.9   Regulated providers should consider auditing/assessing the company's performance against externally recognised standards such as:

- the British Standard BS18477:2010 for inclusive service provision – identifying and responding to consumer vulnerability.
- the Business Disability Forum's Disability Smart Suite.

A1. Key words

A1.1   Below is a non-exhaustive list of key words and phrases which may be used to find out about the services available for customers who require special assistance.

A1.2   Regulated providers should consider reviewing the search function on the company's website and online resources for staff to ensure that the relevant information appears prominently when any of these key words and phrases are entered.

A1.3   Regulated providers should also consider consulting with user groups to ensure that the list captures the key words/phrases that disabled people and their carers, helpers or relatives are likely to use or prefer to use when looking for information or discussing accessibility issues.

List of key words

- accessibility
- accessible
- accessible communications
- accessible format
- autism
- bill management
- blind
- blindness
- blue badge
- braille
- British Sign Language
- BSL
- care assistant
- care worker
- carer
- coloured paper
- deafness
- dexterity
- disabilities
- disability
- disabled
- disablement
- dyslexia

- emergency video relay
- free directory enquiries
- GC C5
- GCC5
- General Condition C5
- hearing
- hearing aid
- hearing impaired
- hearing impairment
- hearing loop
- hearing loss
- hospital
- impaired
- impairment
- impediment
- large format
- large print
- learning difficulty
- learning disability
- long term hospital stay
- manage account

- managing your account
- mental health
- mobility
- Next Generation Text service/relay
- NGTS
- paralysed
- physical disability
- priority repair
- priority repair service
- screen reader
- sight loss
- sign language
- text emergency services
- text relay
- textphone(s)
- third party
- third party bill
- through-connection
- video relay
- visual impairment
- visually impaired
- wheelchair

A2. Useful resources

British Standard for inclusive service provision – identifying and responding to customer vulnerability (BS18477: 2010)

Business Disability Forum (BDF) – disability smart suite

Citizens Advice – information about the duty to make reasonable adjustments for disabled people

Communications Consumer Panel reports on Inclusive Communications – helping older and disabled people to get more from their communications services

Direct Marketing Association (DMA) – guidelines for call centres dealing with vulnerable consumers

Employers' Forum on Disability guide on improving access to call centres

Global Accessibility Reporting Initiative website to help consumers to find a device with the accessibility features that work best for them

Ofcom's consumer advice on accessibility

Ofcom's usability and accessibility research

Ofcom mystery shopping: information on telecommunications services for disabled consumers

UK Regulators Network (UKRN) – leaflet on getting extra help for essential services

Web accessibility initiative at W3C – includes guidelines on how to make web content accessible for disabled people