

Review of the General Conditions of Entitlement

A response from Scope

March 2017

Summary

Scope welcomes the opportunity to respond to Ofcom's consultation on proposed changes to the General Conditions of Entitlement.

Disabled people often face barriers in accessing communication services and switching between services.

Addressing these issues is crucial to providing disabled consumers with adequate choice in the communications market, which will help individuals to make best use of their spending power.

Recommendations

- **Ofcom should explore ways in which it could assess the quality of service communication providers provide to disabled people, to enable these consumers to make more informed choices when choosing a supplier.**
- **Ofcom should monitor, and report on, the extent to which disabled people are able to switch successfully from one communication provider to another.**

About Scope

Scope exists to make this country a place where disabled people have the same opportunities as everyone else. Until then, we'll be here. We provide support, information and advice to more than a quarter of a million disabled people and their families every year.

Introduction

1. This submission is a response by Scope to Ofcom's consultation on proposed changes to the General Conditions of Entitlement.
2. Disabled people are more likely to experience consumer detriment as a result of the extra costs of disability. Scope research shows that on average, these costs amount to £550 a month¹, making it harder for disabled people to get into work, access education and training opportunities and participate in the consumer economy.
3. Scope is pleased that Ofcom is reviewing the experiences of disabled people as part of this review of its General Conditions of Entitlement. As with all consumers, disabled people will be reliant on a range of communication services, particularly landline services.
4. However, disabled people often face a number of barriers to engaging successfully in the communications market. By addressing these challenges, disabled people will be in a stronger position to identify and access services from communication providers that best meet their needs as consumers, enabling them to make best use of their spending power.
5. Our response to this consultation focuses on **section 9, 'Measures to meet the needs of vulnerable consumers and end-users with disabilities'**.

Disabled people's experiences as consumers

6. Disabled people face a range of disability-related costs, which may arise through things such as expensive purchases of specialised equipment, greater use of taxis and private hire vehicles, or higher costs for things like insurance.
7. These costs amount to an average of £550 a month². One in 10 spends over £1,000 on costs of this sort³.
8. The extra costs disabled people face will have a significant impact on disabled people's financial stability. This can be seen by the fact that:

¹ Scope (2014), Priced Out, <https://www.scope.org.uk/Scope/media/Documents/Publication%20Directory/Extra-Costs-Report.pdf?ext=.pdf>

² Ibid

³ Ibid

- Disabled people have an average of £108,000 fewer savings and assets than non-disabled people⁴.
 - Households containing a disabled person are twice (16 per cent) as likely as households without a disabled member (8 per cent) to have unsecured debt totalling more than half their household income⁵.
- 9 Alongside action to drive down the additional costs of disability, information to navigate markets and make effective purchasing decisions is also important in empowering disabled people as consumers.
- 10 However, in a year-long Scope inquiry into the extra costs disabled people face, **less than half (49 per cent) of disabled people feel they only have some of the information they need or want when buying things online or in-store**⁶.

Response to questions

Question 14: Do you agree with our proposals to introduce a new requirement for communications providers to take account of, and have procedures to meet, the needs of consumers whose circumstances may make them vulnerable?

Question 16: Are there any other modifications to the proposed revised condition on measures to meet the needs of vulnerable consumers and end-users with disabilities that you consider would be appropriate?

- 11 We know that disabled people often have a poor experience as consumers – **three quarters of disabled people have left a shop or business because of poor disability awareness or understanding**⁷.
- 12 In many cases this may be due to inadequate communication processes with disabled consumers. For example, Ofcom’s own research has found that hard-of-hearing people contacting call centres reported that requests to speak more slowly are often ignored, whilst blind people reported that call centre workers assume that callers can see and can do what they are asking, e.g. read out a serial number⁸.
- 13 Another challenge is around digital inclusion – **25 per cent of disabled adults have never used the internet compared to 6 per cent of non-disabled**

⁴ McKnight, A. (2014). Disabled people’s financial histories: uncovering the disability wealth penalty, CASE paper 181

⁵ Scope (2013). Disabled people and financial well-being - credit and debt, <http://www.scope.org.uk/Scope/media/Documents/Publication%20Directory/Credit-and-Debt.pdf?ext=.pdf>

⁶ The Extra Costs Commission (2015). Driving down the extra costs disabled people face – Final report, <http://www.scope.org.uk/Scope/media/Interim-report/Extra-Costs-Commission-Final-Report.pdf>

⁷ Ibid

⁸ Ofcom (2010). Disabled customers and call centres, <http://consumers.ofcom.org.uk/files/2010/05/callcentres.pdf>

adults⁹. Whilst in some case disabled people may lack the skills to use the internet, inaccessible web content can also act a barrier to getting online.

- 14 Where disabled people are unable to engage with communication providers satisfactorily, they are disadvantaged in accessing useful information about deals, services and support they provide, e.g. priority fault repair for disabled people who depend on voice services.
- 15 As such, Scope supports Ofcom's proposal to introduce a requirement for communication providers to take account of – and respond to – the needs of consumers whose circumstances may make them vulnerable. This would help to reduce the barriers that disabled people – and other consumers – face in engaging successfully with communication providers.
- 16 It is also important to consider the information available to disabled people – and other consumers – about the range of communication providers in the market, to support them to make informed choices as to who would best meet their needs as consumers.
- 17 Research by the Extra Costs Commission found that the top three factors that would make them return to a business are friendly and helpful staff, good accessibility, and the opportunity to get value for money on purchases.
- 18 Recognising the fact that disabled people are often lacking the information they need when making consumer choices, and that communication services are vital for all consumers, Ofcom should consider how it could use its profile and credibility to assess the quality of service that communication providers offer to disabled people. For instance, this could involve ranking providers according to their approach to disabled consumers in terms of things like customer service and digital accessibility.

Ofcom should explore ways in which it could assess the quality of service communication providers provide to disabled people, to enable these consumers to make more informed choices when choosing a supplier.

- 19 Previous research has identified that challenges for older and disabled people when switching between communication providers may include system-related issues, e.g. passwords and call routing systems, or things like inflexible customer service responses¹⁰.

⁹ Office for National Statistics (2015). Internet Access – Households and Individuals, <http://www.ons.gov.uk/peoplepopulationandcommunity/householdcharacteristics/homeinternetandsocialmediausage/datasets/internetaccesshouseholdsandindividualsreferencetables>

¹⁰ Rica (2015) Inclusive communications – the experiences of older and disabled consumers, <http://www.communicationsconsumerpanel.org.uk/downloads/inclusive-communications-research---final.pdf>

20 Recognising that disabled people have a lower level of financial resilience than non-disabled people and often have negative experiences as consumers, they would seek to benefit in particular from switching communication provider. Therefore, Ofcom should monitor the extent to which disabled people are able to switch, so as to identify and address barriers to enabling this to happen.

Ofcom should monitor, and report on, the extent to which disabled people are able to switch successfully from one communication provider to another.

Question 15: Do you agree with our proposals to update regulation by extending the current protections for end-users with disabilities, which currently apply only in relation to telephony services, to cover all public electronic communications services?

21 Whilst disabled people are more highly represented as users of landline services than non-disabled people (77 per cent vs. 72 per cent)¹¹, the number of disabled people using other electronic communication services is rising. For instance, Ofcom's own research shows a significant increase in connected devices among disabled people since 2012, e.g. smartphones, tablet computers¹².

22 The internet provides access to tools to compare different markets, as well as access to the best deals and offers. This has the potential to help disabled people manage the additional costs they face more effectively.

23 It is essential, thus, that barriers are removed that may prevent disabled people from accessing these services. This is also key to ensuring disabled people have sufficient choice when deciding which communication method(s) to use.

24 As such, Scope supports Ofcom's proposal to extend current protections for disabled people to cover not only telephony services, but all public electronic communication services.

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¹¹ Ofcom (2015). Disabled consumers' use of communication services, http://stakeholders.ofcom.org.uk/binaries/research/medialiteracy/1515282/Disabled_consumers_use_of_communications_services.pdf

¹² Ibid