

# **NCBI Submission to the Commission for Energy Regulation**

## **Customer Protection in the Deregulated Electricity Market Consultation Document**

NCBI (National Council for the Blind of Ireland) is pleased to contribute to the Commission for Energy Regulation “Customer Protection in the Deregulated Electricity Market” Consultation Document.

### **Proposal 1: Customer Education Campaign**

NCBI is in favour of customer education campaign. However, we do recommend that accessibility be a key component of the campaign. Important accessibility issues exist, which we have outlined below:

#### **Making Information Accessible**

As a general principal, customers should be able to receive information in whatever format best suits their needs. This may be print, online or through personal contact (e.g. over the phone). People with vision impairments have specific needs in relation to information formats. Many people with vision impairments are print impaired. Many cannot read Braille. Many do not have internet access. There is therefore no single solution that will be accessible to all. Service providers should undertake to ascertain the individual customer’s needs. They should do this proactively, in order to avoid situations where a customer receives information in an inappropriate ‘default’ format that they cannot read and then has to contact the provider in order to request a suitable format.

In ascertaining the needs of a customer, service providers should take an approach based on functional accessibility, not defined disability types. For example, a customer might be provided with example information in various formats and asked to choose which one works best for them. In no cases should a customer have to prove they ‘have a disability’ or state what disability they have. Many people with functional impairments may be unwilling to ‘label’ themselves in this way. The variability in functional requirements,

even within defined disability types, makes this approach less effective anyway. Customers should be able to elect to receive information in their preferred format without declaring themselves as having a 'disability' in some way.

### **A. Print Information**

Print information about the switch including brochures, leaflets, factsheets, instructions, application forms etc. should be made available in clear print, large-print, audio and Braille. NCBI Media Centre provides an audio recording, Braille transcription service, clear print advisory service and Clear Print Mark and would be happy to advise further.

### **B. Accessibility of Technology**

Online information should adhere to the Web Content Accessibility Guidelines (WCAG 2.0) so that it can be accessed by customers with sight loss using screen reading and magnification software on their computer. Online or televised audio-visual information can be made accessible using audio description. NCBI Media Centre offers an audio description service and would be happy to advise further. NCBI Centre for Inclusive Technology ([www.cfit.ie](http://www.cfit.ie)), which provides information, education and assistance in designing accessible websites and other information and communication technologies, would also be happy to assist.

For websites and other online tools, it is particularly important to address accessibility from the start and throughout the design process, as it may be very difficult to make an inaccessible product accessible at a later stage.

### **C. Accessible Services**

The telephone is a lifeline for many people who are blind or vision impaired. NCBI is therefore very much in favour of providing a dedicated customer information service unit, which customers can call to ask for assistance should any problems arise. The helpline number should be communicated using the appropriate channels outlined in proposal 5 below.

It is absolutely essential that dedicated customer information service staff receive disability awareness training as well as other frontline and managerial staff. Disability awareness training will encourage a greater understanding of the issues around sight loss and promote quality customer services that are accessible to all.

When choosing disability awareness training programmes for staff, NCBI is of the opinion that a categorisation of disability awareness training is required.

For example:

Category 1: Training might only involve showing a video about the needs of people with disability during staff induction training.

Category 2: Training might be a 3-hour session showing perhaps some general advice about how best to facilitate people with disabilities as well as some practical training for example.

Category 3: Training could be a full 2-day interactive training course provided by professionals who have many years of experience in the field of accessibility and / or disability awareness training, as well as by presenters who themselves have a disability.

There could also be specialised training courses specifically for managers of services, rather than for frontline staff; and courses for people who design or maintain websites and/or information leaflets to explain to them how to provide such services in accessible formats.

To say that all staff has received disability awareness training seems to imply that they all received the same type, quality and amount of training. It is not necessary or advisable for all training to take the same form, or the same length of time, or to be delivered by the same people.

NCBI would be happy to advise further.

#### **D: Appropriate Communications Channels**

Once information and services have been made accessible, it is vital that people with sight loss are informed about their availability. NCBI

recommends that the communication channels outlined in proposal 5 be adopted as a key part of a Customer Education Campaign.

## **Proposal 2: Price Comparison Tools**

NCBI is in favour of the proposal to facilitate the development of price comparison tools, but recommends that all of the accessibility issues, outlined above in proposal 1, also be embraced when these tools are being developed. For example, if a price comparison tool is going to be set up online, it is particularly important to address accessibility from the start and throughout the design process. It may be extremely difficult to make an inaccessible online price comparison tool accessible.

## **Proposal 3: Doorstep Checklist**

### **1. Accessible ID Cards**

It is important for a person who has no sight or limited vision to be able to confirm the authenticity of the person calling to their door. NCBI recommends that the ID cards of doorstep seller provide Braille label with appropriate information and comply with NCBI's clear print principles. NCBI would be happy to advise further in this regard.

### **2. Disability Awareness Training**

NCBI recommends that doorstep sellers receive disability awareness training, as discussed above in proposal 1.

### **3. Accessible Information**

NCBI is in favour of the introduction of a Step by Step Guide or Factsheet. However, if a step-by-step guide or factsheet is produced it should be available in Braille, audio, large print, and accessible online. It is also essential to inform people with sight loss about the availability of these formats and how to obtain them, using the appropriate channels, outlined below in proposal 5. Alternatively, as suppliers maintain a register listing customers who have "particular" needs (which includes customers who are blind or vision impaired), this information could be used to check what format the customer requires when sending out this guide / factsheet.

## **Proposal 4: Annual Statement of Price Comparison and Consumption**

NCBI agrees that an annual statement of price comparison and consumption would be of benefit.

People with sight loss may already be missing out if suppliers marketing material and websites outlining special offers or ways to be more energy efficient for example are not accessible. They may also be missing out if they have difficulty with reading their meter and instead rely on estimated bills.

It is absolutely vital, however, that an annual statement is provided in an accessible format that the customer requires, that is Braille, audio, large print or online. As suppliers maintain a register listing customers who have “particular” needs (which includes customers who are blind or vision impaired), this information could be used to check what format the customer requires when sending out this statement.

Where customers are required to access an online statement, any online registration and logging in procedures must be fully accessible. This is important because many such procedures rely on the use of CAPTCHAS, tests to ‘prove’ the applicant is a real person and not an automated software application. The standard visual CAPTCHAS present an insurmountable barrier to people who are blind and even those that include audio or other alternatives are equally inaccessible in practice. To achieve equality of access, registration and logging in should be as easy for people with vision impairments as for those without. Security features should either be completely accessible throughout or should include ‘alternative’ methods that are as quick and convenient as the ‘standard’ methods. For example, consumers with vision impairment should not be required to take the extra step of contacting a customer service representative.

NCBI also recommends setting up a standard template or guidelines for the annual statement, specifying standards for content and layout, which complies with accessibility requirements. NCBI would be delighted to advise further in this regard.

## **Proposal 5: Communicating with Customers with Sight Loss**

Once information and services have been made accessible, it is absolutely essential to promote their availability amongst people with sight loss using the appropriate communication channels. Newspaper adverts and posters are not accessible to most people who are blind or vision impaired. Appropriate channels can include the following:

- Customer service staff on a dedicated helpline number should be made aware of the availability of accessible formats so that they can inform customers, as appropriate.
- It is helpful if printed information states the following on the front page: "This [form/leaflet/guide etc] is available in Braille, audio, large print or email upon request. To request a copy please contact locall xxx or email xxx".
- NCBI can help to promote the availability of these formats, upon request, by informing our service users through our website, internal and external newsletter and our community based staff for example.
- Information can also be communicated to people with sight loss via radio, television and accessible websites.

## **Proposal 6: Definition of Vulnerable Customers**

NCBI agrees that the definition should include customers with sensory disabilities and customers aged 66 and over, particularly in light of the fact that, of the 15,500 people currently on NCBI's database, 58 per cent are over the age of the 65 years.

## **Additional Comments:**

### **Code of Practice for Customer Protection and Consultative Framework**

NCBI welcomes the provision of Codes of Practice, which outline consumer protection measures to which energy suppliers commit, we do however call for more monitoring in relation to implementation of those commitments.

NCBI has been consulted by ESB Customer Supply in relation to making their services accessible over the past few years. However, we have not received an update about whether our recommendations have been implemented.

In 2006, ESB consulted with NCBI about recommendations of what its commitments should be in its publication “ESB Customer Supply: Code of Practice for Priority Customers and Registered Customers”. However, following initial consultation, NCBI has not been informed about the content of the final publication or about ways of communicating these commitments to people with sight loss.

In 2007, ESB consulted with NCBI again in relation to producing accessible identification cards for household meter readers as well as producing accessible outage cards. NCBI made a number of recommendations about ways to make both the ID cards and the outage cards accessible to people with sight loss. However, unfortunately ESB confirmed that neither the ID cards nor the outage cards could be made accessible due to a number of practical unchangeable reasons.

Mid-2009, ESB commissioned Red C Research to develop a new refreshed electricity bill design for its customers. NCBI met with and submitted recommendations to Red C Research on ways to ensure that the new design of the bill is as accessible as possible to people who are blind and vision impaired. NCBI did not receive feedback on whether our recommendations have been implemented.

In 2010, NCBI contacted ESB’s Access Officer to highlight the fact that ESB Networks Electricity Meter Reading Card was not accessible. In this instance, we were delighted that most of our recommendations in terms of clear print were taken on board and a more accessible card was produced.

Last year, NCBI requested feedback from ESB’s Access Officer, about whether any of our previous recommendations have been implemented but have not received an update due to a number of practical reasons.

In 2010, Bord Gais contacted NCBI to inform us that customers of Bord Gais who are blind or vision impaired can now avail of Braille bill and talking bill services. Bord Gais also informed NCBI that they had produced audio versions of its Terms and Conditions, Customer Charter and Codes of Practice which are available upon request. NCBI promoted these services to people with sight loss on behalf of Bord Gais. Later in 2010, we made contact with Bord Gais requesting further consultation but have not received a response.

NCBI calls on the CER and energy suppliers to take greater advantage of the expertise of NCBI when seeking to respond to the needs of people who are blind or vision impaired. It is vital that customers who are blind and vision impaired and representative organisations of are better included in the consultation framework and feedback be provided.

## **Electronic Billing**

NCBI recommends that energy suppliers be obliged to provide the option of e-billing to customers. Bill formats should be designed to be accessible according to the Web Content Accessibility Guidelines (WCAG 2.0 level AA) and compatible with all commonly used assistive technologies and adaptations. NCBI Centre for Inclusive Technology ([www.cfit.ie](http://www.cfit.ie)), which provides information, education and assistance in designing accessible websites and other information and communication technologies, would also be happy to assist further.

## **Terminology**

The use of the term “vulnerable customers”, “the disabled”, “special services register” and “the elderly” are out of date. NCBI recommends the following: change “vulnerable customers” to “Customers with Particular Requirements”, “the disabled” to “people with disabilities”, “special services register” to “register of customers with particular requirements” and “the elderly” to “people aged 66 and over”. The term “elderly” could be confusing as it does not specify a particular age category and could be interpreted to mean over 80’s, for example.



NCBI also recommends the use of the term “customers with vision impairments” rather than “visually impaired customers”.

ESB Customer Supply “Caring for Customers with Special Requirements - Registration Form” also uses the term 'carer'. The form states that ESB Customer Supply will communicate with a ‘nominated relative or carer’. NCBI recommends that this should instead read: ‘nominated person’. The title of the form itself “Caring for customers with special requirements” should be changed to something like “Providing a service to customers with particular requirements”.

### **About NCBI**

NCBI (National Council for the Blind of Ireland) [www.ncbi.ie](http://www.ncbi.ie) is a not-for-profit charitable organisation that provides support and services to more than 15,500 people of all ages who are blind and vision impaired throughout the country.

Our vision is for people who are blind and vision impaired to have the same opportunities, rights and choices as others to fully participate in society. Our mission is to enable people who are blind and vision impaired to overcome the barriers that impede their independence and participation in society.

### **Further consultation**

NCBI hopes that CER will consider our recommendations in light of these arguments on the basis that maximising accessibility as well as increased customer satisfaction. We would be keen to discuss the issues above in more detail and be involved further in the consultation process.

For more information, please contact Niamh Connolly or Mark Magennis for more information.

NCBI Head Office  
Whitworth Road  
Drumcondra  
Dublin 9  
Locall 1850 33 43 53

[info@ncbi.ie](mailto:info@ncbi.ie)  
[www.ncbi.ie](http://www.ncbi.ie)  
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