5 May 2015

Project Manager
Communications Alliance
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ACCAN thanks Communications Alliance for the opportunity to make comments on the review of Information on Accessibility Features for Telephone Equipment Industry Code (C625:2009).

## Response to Proposal

In 2014 ACCAN commissioned a mystery shopping project to test what information was provided by Telco customer service and sales staff in response to disability-related inquiries over the phone and in stores[1]. The results of the research indicate that the disability awareness levels of customer service agents, both in-store and contact centres, is alarmingly inadequate. Up to date and relevant information about telecommunications products and services suitable for people with disability is critically important if people with disability are to be included in our fast moving digital economy. In light of the results from this research ACCAN proposes that the Code be improved through inclusion of a provision mandating disability awareness training for CSP customer-facing staff.

Additionally, ACCAN is concerned that the proposal to remove the mobile handset matrix from the G627 Guideline and for C625 to specify obligations for mobile handsets equipment suppliers to only use GARI for meeting these obligations will further undermine awareness of accessible telecommunications equipment for both consumers and telecommunications customer-facing sales staff. Whilst ACCAN understands that there is an element of duplication in maintaining both the guideline matrix and the GARI matrix, ACCAN is of the view that it is inappropriate for industry codes to rely on third party web content. ACCAN therefore recommends that the guideline matrix be maintained as the reference point for this Code and that the guideline matrix continue to be reviewed annually as is required by the Code. It is important that the matrix continue to provide CSPs and consumers with accessibility developments in consumer equipment.

[1] See https://www.accan.org.au/our-work/submissions/953-accan-s-disability-mystery-shopping-report

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## Code comments

### Explanatory statement

The background to the 2005 version should be updated to reflect the most recent statistics on the incidence of disability in Australia. The reference to ACIF C521, 2004 needs to be updated to reflect that the Code has subsequently been incorporated into the Telecommunications Consumer Protection Code.

### 1.1.3 (a)

This reference needs to be updated to reference the current version of TCP Code.

### 1.5.2

ACCAN notes that the Code stipulates that the associated guideline (G627) will be reviewed at least annually; this has not been the case.

### Definitions

The Note relating to the terminology of System Integral Terminal needs to be deleted.

### 3.1

This refers to an obsolete version of the TCP Code and needs to be updated to reference the current TCP Code. In the current version of the TCP Code the relevant clause is 4.4.2.

### 3.2.1

The note in this section "NOTE: Information should be made available on request in an accessible format such as HTML, MS Word or RTF" should be made into a Code provision rather than a Note and the word "should" replaced with the word "must".

Reference to 3.2.1(b) of the Disability Matters: Access to Communication Technologies for People with Disabilities and Older Australians Industry Guideline (G586:2006) needs to be changed to reflect that this guideline has been retired and the information is now available on the Communications Alliance website.

Sincerely

Wayne Hawkins

Disability Policy Advisor

# ACCAN's Disability Mystery Shopping report.

September 2014

## Introduction

ACCAN (Australian Communications Consumer Action network) has a strong membership base of disability organisations and individuals with disability. The most consistent feedback we get from our members relates to the lack of available information about telecommunications equipment and services for people with disability. Access to telecommunications for people with disability in Australia has long been recognised as a fundamental contributor to the disability digital divide.

There are a number of new and emerging telecommunication products which can improve access and participation for people with disability, however, without information about these products and how to access them, people with disability will continue to be left out of our increasingly connected digital community.

## Background

ACCAN commissioned a mystery shopping project to test what information was provided by Telco customer service and sales staff in response to disability-related inquiries over the phone and in stores. We needed to verify the anecdotal reports we receive and develop an evidence base-line on availability and accessibility of information relevant to people with disability, to inform our discussions with industry and policy makers.

In total we made 200 inquiries comprising 100 visits to Telstra, Optus and Vodafone stores and 100 phone calls to Telstra, Optus, Vodafone, TPG and iiNet. The inquiries were made in March and April 2014.

## Methodology

- The mystery shoppers presented with a variety of inquiries that are typical of the inquiries made by or on behalf of people with disabilities.
- For example, one inquiry we made was:

"My son is Deaf and is moving into his own apartment next month. Are there any phone services for Deaf people? We've always made calls for him and taken messages but now he will be on his own so we are investigating what is available."

- We undertook a mix of inquiries like this for deaf and hearing impaired scenarios, as well as blind and vision impaired scenarios and also dexterity impaired scenarios. We inquired about both landlines and mobiles for each of these groups.

For each type of inquiry we developed a complete list of products and services that we know are available according to each Telco's official policies, or should be available according to law.

All of these would ideally have been mentioned by staff for each of the inquiry types. The list for different telcos differed according to the different services available.

A score from 0 to 3 was given according to how many of the products or services were mentioned by staff, with a 0 score being given when staff mentioned none, and 3 when staff mentioned all or almost all.

## Results

Disappointingly, the results we received were not good. No one company performed significantly better or worse than any other. Overall the results for each of the companies surveyed supported the anecdotal reports we receive on access to relevant telecommunications products and services for consumers with disability – it is very difficult to get information from telco sales staff.

Unfortunately on the majority of occasions, unless the person inquiring already knows what is available and specifically asks for it, they are likely to remain uninformed or only partially informed. While the individual shopper reports indicate that most staff are professional, friendly and polite, on the whole this study would indicate they are inadequately informed about what is on offer for people with disabilities.

## Telco response

ACCAN contacted each of the telcos surveyed and shared the research results with them. We have had follow up discussions with Telstra, Optus and Vodafone to review the research and discuss what needs to change, what improvements should be expected and what initiatives each of the telcos plan to implement in response to the information provided by this research. These ongoing discussions have been very constructive. Each of the telcos have acknowledged that the research has highlighted disappointing gaps in the awareness and knowledge of their customer service agents, and as such, each telco has begun implementing a number of measures to improve both call-centre and shop-front agent's disability awareness.

ACCAN has committed to ongoing discussions with the telcos to encourage improvement, provide useful consumer feedback and importantly to help publicise telco information and resources relevant and useful for telecommunications consumers with disability. We will update our Disability Portal https://accan.org.au/consumer-info/disability with information resources from each of the telcos, providing an up-to-date one-stop shop for telecommunications consumers with disability.

ACCAN has been encouraged by the positive response from Telstra, Optus and Vodafone and we look forward to seeing improvement in the availability and accessibility of telecommunications products and services information for consumers with disability.