



Utility Regulators Draft Forward Work Plan 2010-2011

Disability Action's Response January 2010

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INTRODUCTION

- 1 Disability Action is a pioneering Northern Ireland charity working with and for people with disabilities. We work with our members to provide information, training, transport awareness programmes and representation for people regardless of their disability; whether that is physical, mental, sensory, hidden or learning disability.
- 2 21% (369,390) of adults and 6% (105,540) of children in Northern Ireland have a disability and the incidence is higher here than in the rest of the United Kingdom. Over one quarter of all families here are affected.
- 3 As a campaigning body, we work to bring about positive change to the social, economic and cultural life of people with disabilities and consequently our entire community. In pursuit of our aims we serve 45,000 people each year.
- 4 Our network of services is provided via our Headquarters in Belfast and in three regional offices in Carrickfergus, Derry and Dungannon.
- 5 Disability Action welcomes the opportunity to respond to this draft and to aid our response has put the relevant page/paragraph of the draft in brackets at the end of our comments.

SPECIFIC COMMENTARY

- 6 Disability Action is disappointed that the contact details for Elena Ardines do not contain a textphone or dedicated SMS number thereby disadvantaging deaf people who may wish to contact the Regulator's office.

(Cover email)
- 7 The wording should read "customers experiencing ill-health" not "customers with health problems" and disabled and older people should be added to the list of vulnerable customers.

(Page 7: Para 2.13)

- 8 Disability Action believes that the Regulator's monitoring of service to vulnerable customers should include regular face-to-face discussions with such individuals and their representative organisations.
(Page 7: para 2.13)
- 9 Disabled people are as a group less likely to have access to ICT. The Regulator must ensure that any new or revised IT systems do not further disadvantage disabled consumers.
(Page 9: Para 2.25)
- 10 The section on Gas should include a paragraph on the protection of vulnerable consumers.
(Pages 7-9: Paras 2.16 - 2.26)
- 11 In relation to the section on Electricity please see our comments at paragraph 10 above.
(Pages 9-12 Paras: 2.27 – 2.48)
- 12 Disability Action welcomes the section on vulnerable customers and would advise the Regulator to add a section on working not only with Government but also directly with people who are experiencing fuel poverty to ensure a better understanding of those issues from their perspective.
(Page 14: Paras 2.60 and 2.61)
- 13 Paragraph 2.63 should be rewritten to clarify which pieces of Equality Commission guidance the Regulator's office will review its compliance with.
(Page 15: Para 2.63)
- 14 In relation to the review of ICT infrastructure, please see our comments at paragraph 9 above.
(Page 15: Para 2.65)
- 15 Regardless of any technical difficulty in creating tables, any information produced by the Regulator should as an absolute minimum be prepared in point 12 of an accessible font such as Ariel.
(Pages 18-23)

- 16 Reference item 70 of the Forward Work Plan, Disability Action would advise that the word “dummy” is offensive to disabled people regardless of the context in which it is used.
(Page 22: Ref: 70)
- 17 Reference items 72 and 75 please see our comments at paragraphs 13 and 14 above.
(Page 23: Ref: 72 and75)
- 18 Disability Action advises the Regulator to seek advice from representative groups on how to ensure the production of an effective and inclusive stakeholder communication programme.
(Page 23: Ref 77)
- 19 Disability Action believes that when working to include the most vulnerable consumers the Regulator may need to allocate resources in a way which may not be seen (in pure financial terms) as value for money, such a requirement must not be used to dismiss the needs of hard to reach groups.
(Page 24: Para 4.1: Resources)

CONCLUSION

- 20 Disability Action has welcomed the opportunity to contribute to this important consultation.