

## RNIB Response to NIAUR Draft Social Action Plan 2009-2014

RNIB is the major agency for people with sight loss in Northern Ireland, with direct and indirect services Province-wide and premises in Belfast, Derry, Omagh and Coleraine. We are in touch with the people we seek to serve in a number of ways, not least through our growing membership scheme and our daily contact with service users.

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### Q1

It is essential for equality of opportunity that information relating to a utility account is provided in an accessible format. This should be done within the same time frame as for those where alternative formats are not necessary. Accessible information means more than just billing information and should include any information about a service that any customer may receive.

For example where a customer experiencing sight loss does not receive their bill in a format accessible to them they may then be required to ask another person to read their bill for them, or to make the payment itself. This not only impacts on the independence and privacy of the customer but further increases their vulnerability in having to rely on others.

Customers with sight loss or other disability must be provided the means to manage their utility account of their own accord.

Furthermore as technology in this field develops the industry must take into consideration accessibility issues and the needs of disabled customers throughout the process of designing, testing and implementing new systems or technologies.

### Q2

A functional definition of vulnerability should be used as opposed to a medical definition as there may be some customers with failing

sight who are not registered with social services for various reasons but who would still benefit from accessing information in alternative formats such as large print.

It should be noted that there is a tendency for utility companies only to deal with that person who is named on the bill or account. However there may be households in which disabled people live where they are not the named account holder. There must be means for households to make this known and to be able to receive the full array of special provisions as a household identified as disabled.

### Q3

Where there are special provisions for disabled customers there needs to be a system of making those customers aware of those provisions that is accessible to those customers.

The same provisions across each utility must be made available to ensure that disabled customers are receiving the same choice of service and are not forced to go with a particular service due to there being better provision for disabled needs. For example whether a disabled customer uses gas or electricity for heating or cooking, electricity and gas suppliers should all provide the same provisions.

Please note that Table 4 shows there are differences between special provisions in relation to gas and electricity. The result of this will be that disabled customers could be forced to use a utility or company that they would not otherwise use because they provide special provisions which meet their needs in relation to their disability. This is an issue of fair competition. Licenses granted by the utility regulator should be dependent upon meeting minimum standards of special service provision.

Again point 4.12 states that there is differentiation between NI Water, NIE and gas suppliers in their provision for special priority reconnection and alternative supply services. This has the potential to reduce the range of options available for a disabled person who uses such equipment or have needs which require their inclusion in this provision. This means such persons are not being given the same choice of service for their energy needs as people without disabilities.

#### Q4

Low income is a major factor in fuel poverty. Given that the majority of blind and partially sighted people are unemployed this means they are more likely to experience low income and therefore fuel poverty. Furthermore many blind people are less mobile than the general population and will therefore be more fuel reliant.

Any measures designed to tackle fuel poverty need therefore to be delivered in a way which is accessible for blind and partially sighted customers.

A social tariff would have a significantly positive effect on those blind and partially sighted people reliant on benefits.

In terms of payment methods for blind and partially sighted customers there are definite issues around the accessibility of meters and of the pre-payment system. Meters can easily be made to utilise audio systems, large print displays or other accessibility technology to enable blind or partially sighted people to use them. RNIB is happy to offer guidance in this area.

Prepayment can be particularly difficult due to having to input long strings of numbers or where the meter is in a location which make it difficult to see. Meters should be designed in order to be able to be placed in a location which is accessible for a blind and partially sighted person in terms of the physical locality and its readability.

Paypoints for purchasing credit for meters must be placed in venues which are accessible.

How payment is made also needs to be made accessible whether this is using a card or through the internet. Again audio output, backlight or other technology can make a meter more accessible. Internet systems need to be designed to be compatible with packages such as JAWS or Zoomtext which enable users with sight loss to utilise IT.

Companies designing meters and related products and services need to engage with blind and partially sighted organisations such as RNIB in order to ensure their products and services are meeting the accessibility needs of blind and partially sighted customers.

Where new initiatives are being designed, such as pre-payment via the internet, steps need to be taken to include the needs of blind and partially sighted people from the very start of the design process. It is more efficient for producers of these systems to design systems that are accessible from the outset, than to consider accessibility after a product is made and to have to go back and add features or other devices to it.

#### Q5

As previously touched upon in order to ensure that disabled prepayment customers are able to benefit from retail competition there needs to be a basic package offered across providers and utilities in terms of accessibility of service for there to be true competition and benefit.

A blind or partially sighted customer will not be able to take advantage of cheaper utility services if the companies offering cheaper tariffs are not offering as full a range of accessibility and support services as other providers. A blind or partially sighted customer should not have to make a decision between a cheaper provider and a more accessible provider.

If the regulator is prepared to operate an agreed best practice standard in relation to debt recovery then this should also be possible for special services supporting disabled customers.

#### Q6

A best practice standard for debt recovery could potentially ensure that blind and partially sighted customers are offered an equal choice in relation to energy supplier as long as best practice standard takes account of the needs of such customers.

Prepayment meters in their current form provide accessibility issues for blind and partially sighted customers. This will have a knock effect to those blind and partially sighted customers who are in debt and are potentially forced by a supplier to install a prepayment meter which due to their sight condition they are unable to operate.

Best practice standard in this regard should ensure that energy suppliers offer flexibility in relation to debt recovery in order that

they maintain a service which is accessible for customers with sight loss.

Q7

Measures outlined in previous question responses would constitute a positive and pro-active approach to providing an equal service to disabled customers. A more supportive delivery of service is likely to foster better relationships between providers and customers which could have an impact on numbers of customers self-disconnecting due to financial hardship. If customers feel better supported by providers they may feel more inclined to actually speak with providers about their financial difficulties. They may also be more likely to expect a positive response and outcome if they were to do so, which again would encourage customers to notify providers where difficulties occurred.

Q8

Methods for raising awareness need to take into account those groups which are most likely to benefit or need special provisions including blind and partially sighted customers. Making information available in alternative formats is essential: Braille, audio, large print, websites that are compatible with accessibility software such as JAWS.

RNIB is the leading organisation representing people with sight loss and as such is well placed to offer guidance on how best to reach these customers. However energy providers themselves must take the lead in conjunction with the regulator. Licensing provision could ensure that accessible means of raising awareness is accounted for in applications.

The energy industry needs to be more proactive in raising awareness of special provisions. There are a range of specialist organisations such as RNIB with access to hard to reach audiences such as would benefit from special provisions. The industry should develop working relationships with such organisations as a means of raising awareness.