

## Your response

Question	Your response
<p><b>Do you have any comments on the Previous Measures outlined in Section 4 of this document?</b></p>	<p>Confidential? – N</p> <p>There is a sporadic use of the term- 'People with disabilities' throughout the report. It should be standardised to 'Disabled people' as you have correctly used in other parts of your report.</p> <p>There is a need for more inclusivity to include those with cognitive impairments to have access to the same breadth of services that BSL have access to.</p> <p>Examples are:</p> <p>4.46 the free 24/7 video relay to contact emergency services should be available to all disabled people.</p> <p>4.56 A cost free transition should be put in place especially for those who are using dial up. The time delay in digital is a barrier access to those with auditory processing impairments, therefore this should be the least minimum standard. A help scheme would be beneficial to assist with transition as was done for television.</p> <p>4.62 This should be wider reaching and include other disabled people not only Blind and Deaf communities. The availability of having information on disks with human voice and not digitised is also to be implemented.</p> <p>4.66 This should not just cover radio and television but On Demand services.</p> <p>4.69 There is a need for On demand services to cater for those with cognitive impairments with dubbing of foreign films and not just subtitling. Also thought may be given to the option to turn signing on or off, as this is an impediment to others and detracts from the enjoyment of television.</p>

**Do you agree with the Action Measures outlined in Section 5 of this document?**

Confidential? – N

Actions:

1: Advertisements should be distributed more widely to reach avenues that all disabled people can access.

2: Publish the percentage of disabled persons within Ofcom in relation to national standards. Within that to publish the percentage of those who are Blind and Deaf communities separately from other cognitive disabilities and impairments and a comparison of these figures to national levels.

8,9 &10: Route for complaint should be at the front of the page and should be accessible in all formats. The think-piece published by Graeme Whippy on September 2021 lists ten fundamental actions that can be implemented to make communications services inclusive and accessible. Stakeholder groups should not only be organisations representing interests of disabled people, but should actually be the disabled persons.

Ten things to do now extract: Making Communications Services Inclusive and Accessible.

1) Update the “contact us” page on your website so it contains all your contact methods, including phone, text/video relay and postal address.

2) Encourage customers to share their service requirements with you from before they become customers and then throughout their time with you.

3) Ensure you have the means to capture service requirements, focusing on impact and not cause, and integrate them into customer services and processes.

4) Have a clear and easily found policy on making reasonable adjustments for customers.

5) Provide all front-line staff with training to raise awareness of the service requirements of disabled and older people and how to accommodate them.

6) Embed compliance with accessibility standards (digital, documents and premises)

into your service development and delivery life-cycle.

7) Educate all stakeholders on the importance of accessibility and usability and how it relates to their role.

8) Conduct research (such as mystery shopping) with disabled and older customers on the accessibility and usability of your services to create a baseline from which you can measure improvements.

9) Do not buy products or services that create barriers: embed accessibility into your procurement process.

10) Consider how new technologies and convergence of services could be used to improve inclusion, and how could you collaborate with others in the sector to create lasting change.

This should start the process of addressing the problems for:

- Being able to communicate, receive information and make informed decisions are basic human rights.
- People are at risk of being denied these rights due to barriers in using communication services.
- Barriers arise from inaccessibility and poor usability, particularly in relation to services delivered via websites and mobile apps.
- Barriers can create or increase a risk of vulnerability.
- Disabled and older people are disproportionately impacted.
- This is bad for customers, bad for society, and bad for business.
- Barriers could lead to exclusion, which in turn could cause or increase loneliness.

11: The report should be wider than radio and television and include On demand and internet based services broadcasting.

12: The awareness of On Demand Programme Services -ODPS for those with sight and /or hearing impairments. The services out there are limited for other disabilities and difficulties. We support the work being done but more

must be done for those with other cognitive impairments and cognitive processing impairments which can be both visual and auditory. A range of learning disabilities and difficulties need to be addressed as well. For example Dyspraxia affects 5 – 10% of the population with 2% being severely affected; Dyslexia affects 10%-17%; mental health affecting another 1 in 4 (25%) of the population. Their accessibility needs must be similarly addressed

16: Is the EECC directive still valid with BREXIT? Accessible format should include human voice recordings.

Action 17: BSL users and all those with Cognitive Processing impairments should have equivalent access to contact emergency services via app or website. Access should not be exclusive but encompass the needs of those with cognitive impairments and difficulties particularly auditory disabilities. Services should not create barriers but embed accessibility for all equally.