

## Consultation response form

Please complete this form in full and return via email to [improving.engagement@ofcom.org.uk](mailto:improving.engagement@ofcom.org.uk) or by post to:

Sukh Walia-Chahil  
Ofcom  
Riverside House  
2A Southwark Bridge Road  
London SE1 9HA

<b>Consultation title</b>	Call for inputs: Helping consumers to engage in communications markets
<b>Full name</b>	Henrietta Doyle
<b>Contact phone number</b>	[X]
<b>Representing (delete as appropriate)</b>	Organisation
<b>Organisation name</b>	Inclusion London
<b>Email address</b>	[X]
<b>We will keep your contact number and email address confidential. Are there any additional details you want to keep confidential? (delete as appropriate)</b>	Nothing
<b>For confidential responses, can Ofcom publish a reference to the contents of your response?</b>	Yes

## Your response

<b>Question 1: Do you agree that we should include SMEs in the scope of our work?</b>	
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**Question 2: What are your views on whether consumers not knowing when to engage is a barrier to their engagement? What impact do you think this has on them and to competition in the various communications markets? Please provide evidence supporting your views, including any research you have conducted or have access to.**

Not Confidential

Inclusion London is pleased that Ofcom is examining the whole subject of barriers to engaging in communications markets.

Inclusion London is a Deaf and Disabled People's organisation. In our response below we raise some of the barriers that Deaf and Disabled People experience, which prevent us taking advantage of the best deals available. Please see the information under Question 8.

Many Deaf and Disabled people do not remember when a contract is up for renewal and allow contracts to roll over and end up paying far more than necessary.

**Question 3: What are your views on the suggested possible solutions to help address consumers not knowing when to engage? What could be their positive or negative effects? What other possible solutions might there be?**

Not Confidential

We totally agree with an end of contract notification.

There should be a choice of formats in which this notice is sent in. Accessible formats for Deaf and Disabled people such as Braille, large print or audio for visually impaired people or in plain English with pictures or symbols and in 18 pt (known as Easy Read) for people with learning difficulties need to be available, otherwise the information cannot be accessed. Providing information in accessible formats complies with the duty to make reasonable adjustments under the Equality Act, see more information under Question 8.

**Question 4: What are your views on whether consumers not understanding their own needs, or having difficulties navigating available information, is a barrier to their engagement? What impact do you think this has on them and on competition in the various communications markets? Please provide evidence supporting your views, including any research you have conducted or have access to.**

Confidential? – N

We very much agree that some Deaf and Disabled people struggle to navigate the information and prices needed to access the best price for a product or service which suits needs. The need to make complex comparisons, often across several websites, is definitely a barrier to many Deaf and Disabled people. Also the time needed to do so is also a barrier. Deaf and Disabled people experience considerable barriers in day to day life, which impacts on emotional wellbeing, the time needed to do extensive searches (usually on the internet adds) adds additional stress and sometimes the time needed is just not available. This makes it far less likely that we will be able to undertake active roles as consumers.

The change of culture from one where loyalty to a company was rewarded to one where you lose financially if you do not shop around is far from a welcome one. Would it not be advantageous to companies to keep customers on a long term basis by offering them exclusive lower prices? Lower prices for loyal customers would save some of the need for extensive, time consuming shopping around.

**Question 5: What are your views on the suggested possible solutions to help consumers understand their own needs, and navigate available information? What could be their positive or negative effects? What other possible solutions might there be, and what might be their effects?**

Confidential? – N

Easily comparable pricing information in accessible formats provided by OFCOM would be very welcome, particularly as some price comparison websites are biased in the information they provide.

The provision of data to consumers on the usage of services in standard and accessible formats would also be very welcome.

<p><b>Question 6: What are your views on whether these (or other) particular contract terms and conditions, or industry practices, are a barrier to consumer engagement? What impact do you think this has on them and on competition in the various communications markets? Please provide evidence supporting your views, including any research you have conducted or have access to.</b></p>	<p>Confidential? – N</p> <p>Different contract end-dates for services with the same provider and locking mobile handsets to a particular mobile provider, just adds another layer of time consuming price comparison which is an additional barrier to finding the best price for the best product for your needs.</p>
<p><b>Question 7: What are your views on the suggested possible solutions to help address the impact on consumer engagement of particular contract terms and conditions, or industry practices? What could be their positive or negative effects? What other possible solutions might there be, and what might be their effects?</b></p>	<p>Confidential? – Y/N</p> <p>Clearer information to consumers when entering or amending contracts with the information in accessible formats for Deaf and Disabled people would be welcome.</p>

**Question 8: Are there other barriers to engagement that you think our work should seek to address? What impact do you think these have on consumers and on competition in the various communications markets? What possible solutions might there be to these barriers, and what might be their effects? Please provide evidence supporting your views, including any research you have conducted or have access to.**

Confidential? – N

A quarter of Disabled adults have never used the internet.<sup>1</sup> Lack of access to the internet results in Deaf and Disabled people paying more for essential goods and services, such as gas and electricity because it becomes more difficult to shop around for the lowest price.

Also, information on some websites is not always accessible to Deaf and Disabled people. To help remedy this for visually impaired people the Royal National Institute for the Blind provides information on accessible website available at: <https://help.rnib.org.uk/help/daily-living/technology/accessible-website>

Also not all Deaf and Disabled people are able to do the price comparison work needed or negotiate a better deal with the current provider over the phone, for a number of reasons, e.g. telephone conversations are not accessible to Deaf people.

Under the Equality Act 2010 there is a legal obligation not to put Disabled people at a disadvantage by making 'reasonable adjustments'. A reasonable adjustment could be putting information into an accessible format, such as Easy Read for a person with learning difficulties or Braille for a blind person. The cost for a company making a large profit such as a bank would be considered reasonable, while a cost that would cause a business to collapse would not be considered reasonable.

Many organisations do not fulfil their legal requirements regarding reasonable adjustments. However, it requires a huge amount of effort to take a legal challenge and can be an enormous strain so it is not what most Deaf and Disabled people wish to do.

Businesses need to proactively meet their legal obligations.

We ask Ofcom to provide information in accessible formats, particularly the easily comparable pricing information because it will be very useful to Deaf and Disabled people

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<sup>1</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/436911/Information\\_about\\_the\\_legal\\_obligation\\_system.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/436911/Information_about_the_legal_obligation_system.pdf)  
<http://www.legislation.gov.uk/ukpga/2010/15/section/20>

**Question 9: What are your views on the need to trial or test potential solutions? To what extent might you be willing and able to participate in or facilitate field trials or other testing of possible solutions?**

Confidential? – N

Yes it would be useful to test potential solutions. It is possible that Inclusion London may be able to participate or facilitate field trials or other testing of solutions.

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