



## **Submission to the Commerce Commission NZ Regarding 111 Contact Code Review**

16/06/2023

### **1. Introduction**

1.1 This submission is made on behalf of the **Grey Power New Zealand Federation Inc.**

1.2 The contact is Jan Pentecost at [REDACTED]

1.3 The Grey Power New Zealand Federation (Inc) is a non-sectarian and non-party political, advocacy organisation that aims to advance, promote and protect the welfare and well-being of older people.

1.4 The Grey Power New Zealand Federation (Inc) is made up of some 73 individual Associations with an overall membership of approximately 50,000.

**2. Comments on the questions** - We only provide answers to questions relevant to older people.

*The President*

*Grey Power NZ Federation Inc.*

[REDACTED]

## Appendix 1: Summary of Requirements and Questions

*Requirement 1: Vulnerable consumers, or persons on their behalf, have reasonable access to an appropriate means to contact the 111 emergency service in the event of a power failure within a defined minimum period.*

*Requirement 2: Consumers are effectively informed about the options available to vulnerable consumers.*

*Requirement 3: Consumers and their representatives have access to effective processes to demonstrate vulnerability.*

Paragraph	Question ID	Question	Response
40	1	In your experience, how has the implementation of the Code impacted the ability of vulnerable consumers (as defined in the Act) to contact the 111-emergency service during power failures? Please provide any evidence you have which supports your views.	No response
41	2	Do you believe that the solutions that have been provided to vulnerable consumers have been effective in providing an appropriate means of contacting 111 during an outage? Why do you hold that view?	No, Grey Power does not believe that the solutions provided have been effective because only 573 people are registered as vulnerable but <i>'Twenty-four percent (167,900) of older people experience health vulnerability.'</i> <sup>i</sup> If the solutions are effective we would have expected a much larger number of people to be registered.
42	3	Do you believe that RSPs have effectively informed consumers about the options	No, Grey Power believes that if RSPs have been effectively informing consumers the information on options would have

		available for vulnerable consumers? Why do you hold that view?	been taken up by more than 573 vulnerable people, as already stated.
43	4	In your view, are all landline consumers being made sufficiently aware of the risk of loss of service during a power outage? What evidence do you have that supports that view?	Grey Power cannot comment about whether <u>all</u> landline consumers are being made aware of the loss of service during a power outage; we would not have a clue about <u>all</u> landline consumers.
44	5	In your experience, are the prescribed processes for demonstrating vulnerability effective and accessible for consumers and their representatives? What are the reasons for your view?	<p>Grey Power believes the processes for demonstrating vulnerability are not easily accessible for a number of their members because the copy Grey Power has of the document to register as a vulnerable person runs to 7 pages and the requirement to have the document signed off by their general practitioner or a J.P. etc., means that some of our members are unable to complete these because of their medical conditions and the cost.</p> <p>And if a person is not registered which seems to only cover on-going health conditions what happens in a power cut when some-one has an accident but no 111 access?</p>
45	6	Do you have any changes you would suggest making to the Code to improve its effectiveness and/or outcomes for vulnerable consumers?	Reduce the hoops that vulnerable people need to jump through to register as a vulnerable person as explained in the answer for Q 5
46	7	Do you have any views on any other matter related to the Code and/or the vulnerability of consumers who rely on the 111 emergency service? Please provide as much detail as possible.	No

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<sup>ii</sup> Older people experiencing vulnerability and multiple disadvantage in New Zealand - [Report \(msd.govt.nz\)](https://www.msd.govt.nz)