

Submitter: Whaikaha – Ministry of Disabled People  
Submission provided via email

Whaikaha – Ministry of Disabled People welcomes the opportunity to offer public feedback on the 111 Contact Code Review - Request for views on the effectiveness of the 111 Contact Code in meeting the requirements in the Telecommunications Act 2001.

Whaikaha has received no substantive feedback or complaints from the disability community on the impact of the code on vulnerable communities so has not responded to **questions 1 – 4 of the review**.

**Question 5 of the 111 Contact Code Review:** The Vulnerable Consumers application form on the Spark website appears burdensome to complete and is not available in accessible (ie. document is a PDF that cannot be read by screen readers) or alternative formats (eg. such as NZSL or Easy Read). The document is 11 pages long and not written in an 'everyday language' style.

The form also requires 3<sup>rd</sup> party validation which can be cumbersome and potentially intrusive for some consumers and their family/whanau.

The information on the removal of the copper network is also not presented in alternative formats.

Whaikaha notes this does not align with F-13.1 and 13.2 of the 111 Contact Code: 13. The process made available must: 13.1 be easily accessible for consumers, bearing in mind the needs of vulnerable consumers; 13.2 not be unreasonably difficult for a consumer to fulfil.

The process is not easily accessible for consumers, bearing in mind the needs of vulnerable or marginalised (disabled people don't like to see themselves described as "vulnerable") consumers and is lengthy and difficult to complete.

**Question 6 of the 111 Contact Code Review:** Whaikaha suggests that accessible and alternative formats need to be made mandatory within the code.

Whaikaha has not considered other telco websites of practices in preparing this response.

Broadly speaking, the withdrawal of the copper network appears to have been well signalled and communicated to the wider community, however Whaikaha is not able to comment on how this has specifically been received by the disability community. It is noted that the information on the removal of the copper network is also not presented in alternative formats.

We commend Spark for making efforts to accommodate [vulnerable consumers](#) through the provision of a telecommunications device that will function in the event of a power outage, and by maintaining a vulnerable customer register, but

as noted above, the information presented is not yet available in alternate formats and therefore not fully accessible to the disability community.

In developing this response we looked into other sites and note that the [Citizens Advice Bureau](#) is communicating the change through it's website, as is [TelNet](#) and other telecommunications companies. No alternative formats could be located. For further information on these options please refer to the MSD website - [Alternate formats - Ministry of Social Development \(msd.govt.nz\)](#)