



Assisted Access:

Developing a model for fair and secure access to telecommunications customer service for Deafblind Australians

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Deafblind Australians

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“Assisted Access: Developing a model for fair and secure access to telecommunications customer service for Deafblind Australians”

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Executive summary

Currently, for reasons pertaining to accessibility of technology and language needs, many Deafblind consumers – those with both a profound hearing and vision loss – struggle to access the customer service of their telecommunications providers. Text based alternatives such as those used with the National Relay Service, or the various Live Chat options offered by many providers, are often inadequate.

The purpose of this report is to outline a model by which Deafblind consumers can achieve access to their telecommunications provider's telephone customer service with independence and on a level that is comparable to that of hearing/sighted customers.

Current information security/privacy practices also prevent this unique customer group from using an Auslan (Australian Sign Language) interpreter to access customer service by phone, as they are unable to provide voice verification of identity to the operator at the time of the call.

While the importance of protecting sensitive account information is understandably a high priority for telecommunications providers, as well as for these consumers, the current reliance on voice verification of the account holder to facilitate account interactions over the phone discriminates against the Deafblind community on the basis of their disability. This consumer group is thus prevented from managing their own internet and telephone accounts in a manner equivalent to the rest of the community.

Over recent times, many Deafblind citizens have embraced the use of smart phones and tablet computers. These devices grant Deafblind people unprecedented independence and access to information and communication with the outside world and have become an essential and integral part of their lives. Unfortunately, they are still being prevented from carrying this level of independence into their interactions with providers. This issue needs to be resolved in a way that allows customer service interactions to take place via a third party of the customer's choosing and which still protects sensitive account information.

Able Australia has therefore undertaken a review of this issue with a view to identifying a practical, secure solution acceptable to Deafblind consumers, their service providers and their facilitators. In order to do this, Able Australia canvassed client preferences, assessed Deafblind worker observations, made comparisons with systems in place in the United States and United Kingdom, and held discussions with telecommunications service providers. Finally, Able Australia worked successfully with Jeenee Mobile, a service provider specialising in servicing the disability sector, to pilot procedural changes in customer service interaction.

A simple solution for this consumer group is now proposed through the adoption of a personal identification number (PIN).

Background to Deafblindness and the Deafblind community

What is Deafblindness?

The Australian DeafBlind Council defines Deafblindness as: “a unique and isolating sensory disability resulting from a combination of both a hearing and vision loss, or impairment, which significantly affects communication, socialisation, mobility and daily living.”¹ This sensory loss may not be complete in that individuals may have reduced, or restricted, vision and use specialist equipment to magnify or project images in particular ways. In essence, Deafblindness involves a dual sensory loss. Despite the impact of their sensory loss the majority of Deafblind Australians live independently in the community.

Many people within this population use Tactile or Visual Frame Auslan as their preferred method of communication. These modified versions of Australian Sign Language allow for signs to be made directly into the hands of a person who is Deafblind, or within a specified frame that allows the Deafblind person to follow what is being said.

How many Australians have dual sensory loss?

In 2005 it was estimated that approximately 288,300 people (1.4 per cent of Australians) have a dual sensory impairment (hearing and vision loss), of which 97 per cent are aged 65 years or older. A report prepared by Access Economics, which examined the prevalence and economic and social costs of dual sensory impairment, found that an ageing Australian population with increasing life expectancy has contributed to a growth in the number of Australians with dual sensory impairment as both hearing and vision loss are strongly age-related.²

Data from the Blue Mountains Eye Study³ found that the prevalence of hearing and vision loss is 81 per cent and 41 per cent respectively for people aged 85 years or older, and the prevalence of dual sensory impairment is over 36 per cent for this age group. It is predicted that the population with a dual sensory loss (hearing and vision) will increase, with the ageing of the population, to 1,650,100 by 2050. Therefore, measures to ensure that Deafblind consumers have equal access to services and information not only benefit the Deafblind community but will also assist the increasing number of people living with dual sensory loss.

¹ Australian Deafblind Council brochure retrieved from: [http://www.deafblind.org.au/content-files/ADBC%20Brochure%20\(no%20crop%20marks%20etc\).pdf](http://www.deafblind.org.au/content-files/ADBC%20Brochure%20(no%20crop%20marks%20etc).pdf)

² Access Economics, Penny Taylor, Presentation National DeafBlind Conference April 2010, *Making sense: A report into dual sensory loss and multiple disabilities in Australia*, 2007, [http://www.deafblind.org.au/content-files/Penny%20Taylor%20-%20Making%20Sense%202010%20\[Compatibility%20Mode\].pdf](http://www.deafblind.org.au/content-files/Penny%20Taylor%20-%20Making%20Sense%202010%20[Compatibility%20Mode].pdf)

³ Cited in Access Economics Study (2010), *Making Sense – An update*, commissioned by Able Australia

Technology and the Deafblind community

Traditionally, those living with Deafblindness were locked out of the technological revolution taking place in broader society. Specialist equipment was expensive and difficult to use, maintain and receive instruction for. This pattern changed with the emergence of Apple iPhones and iPads. For the first time in history, mainstream devices were being manufactured with inbuilt accessibility features that could accommodate the needs of Deafblind people. The Deafblind community was quick to embrace these devices and the new-found independence afforded by them. An in-house survey of Ablelink clients covering the period January 2013 to December 2013 showed that smart phone and tablet ownership increased by 25 per cent to 41 per cent in that year. The results of this survey can be seen in Figure 1 below.

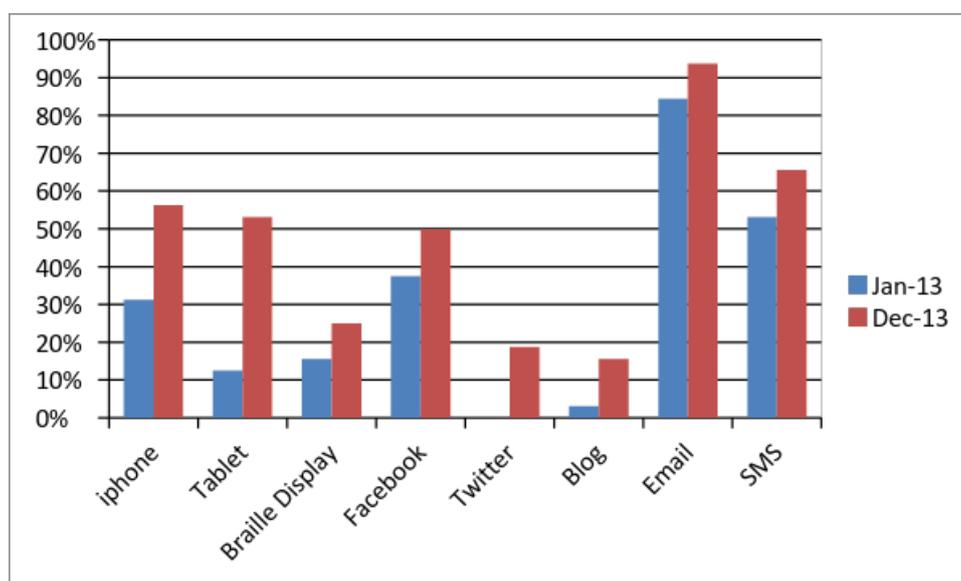


Figure 1: Increased technology and social media use by Deafblind Australians in 2013

With this increase in devices comes an increase in the number of Deafblind people who now have mobile phone and/or internet accounts that they need to manage. For the majority of Australian consumers, the management of phone and internet accounts is a simple case of making a phone call and talking through their needs with a customer service representative or similarly by using a text based web option. These approaches have proven problematic for many Deafblind consumers and the inability to access customer service representatives over the phone via an interpreter represents a significant roadblock in the effective management of these accounts. Deafblind people are currently forced to use a number of alternative access methods that in many cases simply do not meet their accessibility and language requirements.

Where current options break down

For many Deafblind Australians, English is not their first language. They are new to the digital and online worlds and many of the concepts and detailed terms associated with this world are difficult to understand when not communicated in their primary language (Auslan). This language barrier, combined with the inaccessible set up of many online interfaces, means that many Deafblind people would prefer to interact with their provider over the phone, via an Auslan interpreter.

The current reliance on using voice verification from the account holder as a means of protecting account information and the absence of alternative identity verification that can be given via a third party (PIN, password etc) prevents Deafblind consumers from interacting with their providers in this way. Current text and Braille based methods of interaction are vastly inadequate.

National Relay Service

The National Relay Service (NRS) offers a range of options for people who are Deaf or have a hearing impairment and include options such as video relay, teletype, SMS relay and captioned relay. Whilst some Deafblind users can avail themselves of these options, the text to speech method used by the Deaf community to make phone calls does not readily cater to the needs of Deafblind people. The lay out of the NRS website becomes confusing and impractical to use under the large amounts of screen zoom required by users with restricted vision as is the case with many Deafblind people. Additionally, this service requires a real time conversation to take place in text/Braille form which requires English literacy, typing and Braille proficiency at a level far above the comfort and confidence level of many Deafblind people. Similarly, the NRS App and SMS relay services are also difficult to use by these consumers as the above problems are compounded with a variety of device related issues, many of which are device specific.

Live Chat Support

Several telecommunications providers offer a text based online support option. These websites are not designed to be used with Braille or under large amounts of zoom and are often inaccessible to Deafblind users. This method also presents the same issues with respect to English literacy, typing and Braille proficiency/speed as outlined above.

Nominated Account Representative

Many providers already have provisions for customers to nominate a representative authorised to access account information and make certain changes on their behalf. The single representative model, however, is not a satisfactory solution for the Deafblind community as they are rarely in a position to have these interactions take place consistently through the same person. Whether living independently or in supported accommodation, the majority of Deafblind people do not have - or need - a carer to fill this role. They are perfectly capable of managing their own accounts and simply require a trusted bilingual third party to occasionally facilitate interactions with their telecommunications service provider. The nominated account representative, therefore, needs to be flexible enough to include a variety of representatives, such as family members, friends, support staff and interpreters.

Overseas comparisons

The United States model

The solution currently used in the US involves the use of an in-person Communication Facilitator (CF) to allow the Deafblind consumer to make the call through a remote Video Relay Interpreter (VRI). Essentially the process is:

1. Deafblind person and CF are in the same room. They make a video call through a computer to the VRI
2. The VRI calls the requested business
3. The Deafblind consumer signs to the VRI who voices the conversation by telephone to the customer service representative
4. When the customer service representative speaks, the VRI signs. The CF copies the VRI signs into the hands of the Deafblind person

This is the standard practice for third party calls of this nature as it allows for:

- The ethical and confidentiality considerations that come with using an accredited interpreter.
- The service provider being contacted is compelled to accept the phone call under disability discrimination legislation.

This practice was evaluated by Able Australia in conjunction with representatives of the Australian Sign Language Interpreters Association to determine its viability in the Australian context. It became clear that the US model for Deafblind consumers to contact customer service is not a viable solution in Australia for the following reasons:

- The specific role of the Communication Facilitator is not something currently covered in training for Deafblind support staff and would therefore require additional training.
- Monitoring the quality of the CF's work is not part of current interpreter training in Australia and would require additional training for VRI staff members.
- The uptake of VRI services among the Australian Deafblind community is much less than their American counterparts meaning that even in instances where the necessary technology is present in the home, large amounts of training would be required to ensure each Deafblind person was comfortable and confident when using the service.

In Australia, failure to accept calls from the National Relay Service – the Australian version of the VRI – may constitute a violation of section 24 of the Disability Discrimination Act. However, at the present time there is no Australian legislation that specifically *obliges* organisations to accept calls from the National Relay Service. Thus, there is no guarantee that any specific organisation will accept the intermediary's authority: it is up to the discretion of the individual organisation or customer service representative.

The United Kingdom model

The United Kingdom has a number of laws and regulations which require telecommunications providers to accept calls from a third party interpreter. These include:

- The *Equality Act (2010)*
- The *Data Protection Act (1998)*
- Ofcom's *General Conditions of Entitlement*⁴

The United Kingdom's Equality and Human Rights Commission has stated that companies refusing to take calls involving a third party from people with disability would likely be a breach of the *Equality Act*. In a 2010 report, *What equality means for your business*, the Commission stated that:

*"A bank has a policy not to accept calls from customers through a third party. This could amount to indirect discrimination against a disabled person with a learning disability who may use a support worker to call the bank. The right sort of approach is to make sure the customer's records show anyone who deals with them that they may be communicating using a support worker. This is also likely to be a reasonable adjustment."*⁵

The UK Information Commissioner has advised that taking calls via a relay service would not be a breach of the *Data Protection Act*.

*"If any individual contacts an organisation using Typetalk [now Text Relay] or a sign language interpreter we would expect the same level of security to be in place as with any customer. This would include ensuring that adequate security questions were asked to authenticate that the customer is who they say they are before discussing any account details. Once the individual had been authenticated the organisation would be able to answer the enquiry for the customer through the Typetalk operator. The customer who has contacted Typetalk will be aware that information will be disclosed to the operator in order for this to be relayed to them. We would consider that the customer had effectively consented to their information being used in this way."*⁶

The *General Conditions of Entitlement* impose legal obligations on providers of an electronic communication service, or an electronic communications network, to protect consumer interests and to comply with other UK legislation. General condition 15 sets out a number of obligations that protect the interest of customers with disabilities. The condition requires all telecommunications providers to ensure particular groups of customers with disability have access to:

- Suitable directory services including call connection services
- Access to text relay services which include particular facilities

⁴ Ofcom is the independent regulator and competition authority for the UK communications industries.

⁵ Equality and Human Rights Commission, 'What equality law means for your business', *Equality Act 2010 Guidance for service providers Volume 2 of 3*, March 2011, http://www.equalityhumanrights.com/sites/default/files/documents/EqualityAct/service_providers_business.pdf

⁶ Ofcom, 'Can a bank or other service refuse to take a call via a relay service?', *Services and Billing*, <http://ask.ofcom.org.uk/help/services-and-billing/relay>

- Access to priority fault repair services without payment of a premium
- Participation in a nominee scheme to safeguard service in the event that a bill is not paid
- Copies of contracts and bills in a form suitable for visually impaired customers. Providers must ensure that the availability of these facilities is widely publicised in appropriate formats.⁷

These protections are seen as generally effective in ensuring access to telecommunications customer service personnel by Deafblind consumers in the UK, however the corresponding guarantees of protection are not entirely in place within Australia.

⁷ Ofcom, 'Consolidated Version of General Conditions as at February 2015 (including annotations)', 2015, http://stakeholders.ofcom.org.uk/binaries/telecoms/ga/CONSOLIDATED_VERSION_OF_GENERAL_CONDITIONS_AS_AT_26_FEBRUARY_2015_.pdf

The solution

Similar to the UK's *General Conditions of Entitlement*, Section 3.1.1 of the Australian communications industry's *Telecommunications Consumer Protections Code* states: "A Supplier must communicate with a Consumer in a way that is appropriate to the Consumer's communications needs including those with special needs." In addition to this, section 3.7.1 states: "A Supplier must ensure that a Consumer can easily use an Advocate to communicate with the Supplier, if the Consumer requires." However, complying with these directives in a way that offers the flexibility to allow this Advocate role to be filled by multiple people at the discretion of the Consumer represents a unique security concern for Suppliers when coupled with the fact that voice verification from the account holder is not possible.

As a result of this investigation, Able Australia therefore recommends that Deafblind customers be given a unique personal identification number (PIN) which, when provided along with other account information, constitutes sufficient identity verification. There are several ways in which this process could be managed to add additional layers of security. The PIN could be randomly generated prior to each interaction and sent to the customer via SMS or email. Alternatively the PIN could be a single number used for all interactions and kept on file as part of their account information.

Industry feedback on the practicalities of implementing these recommendations was sought to determine their position on implementing a new system which allows Deafblind consumers to communicate, using a third party interpreter, with customer service. Telecommunications provider, Jeenee Mobile, was particularly receptive to implementing a PIN system to allow Deafblind consumers to contact the provider via a third party. Jeenee Mobile has stated that by mid-2015 the PIN system will be implemented as follows:

Where customers may require third party assistance in the future, they will be provided the option to nominate a PIN which can be used as a supplementary form of unique account identification that takes away the need for voice verification and allows them access via an interpreter. The PIN will remain static unless updated by the account holder and can be used in conjunction with other unique information to validate to the account.

This commitment from Jeenee mobile represents a significant step forward. It is hoped that other providers will adopt similar practices in the future and ensure their services also become accessible for all consumers. As the number of people living with dual sensory loss increases with the ageing population, so will the number of customers requiring the assistance of a third party in order to interact with their telecommunications provider.

Authors

Ablelink

Ablelink, a division of Able Australia, is Australia's only Deafblind specific technology education and support provider. Located in the Melbourne CBD, "The Link" offers training, device loans, and technical support and advocacy services in a relaxed drop-in-centre environment. Due to increasing demand from within the Deafblind community, Ablelink services are currently being extended nationwide.

Ben McAtamney

Ben McAtamney has worked with Able Australia for the past five years working directly with Deafblind people and specifically in liaison with telecommunication providers. Involved professionally with the Deafblind community as a Technology/Education support specialist, Ben is a qualified, NAATI accredited Auslan/English interpreter. Through his first-hand experience of the difficulties facing Deafblind consumers face around this issue Ben was uniquely positioned to engage with stakeholders and formulate solutions amenable to all parties.

Katerina Pavlidis

Katerina Pavlidis joined ACCAN in October 2012 after having completed her honours thesis in sociology. As the Grants and Research Officer, Katerina has developed expertise across a range of communications policy areas. This also involves working closely with successful grant applicants to ensure their projects align closely with ACCAN's goals and values, and to ensure the projects have the maximum impact for Australian telecommunications consumers. Katerina also leads ACCAN's policy work in the area of consumer privacy.

