

***eircom's Code of Practice for the
Provision of Services to Users with
Disabilities***

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Introduction

The European Communities (Electronic Communications Networks and Services (Universal Service and Users' Rights) Regulations, 2003 (S.I. 308 of 2003) ("the 2003 Regulations") came into operation on the 25th July 2003. These 2003 Regulations transposed the European Universal Service and Users' Rights Directive 2002/22/EC. In the Commission for Communications Regulation ("ComReg") Decision Notice D06/32 "The Future Provision of Telephony Services Under Universal Service Obligations" (made in accordance with the 2003 Regulations) *eircom* was designated as the Universal Service Provider with specific obligations until the 30th June 2010. Regulation 6 of the 2003 Regulations provides for the provision of "specific measures for disabled users"¹ and in Decision Notice D06/32 ComReg outlined these specific measures which included a requirement for *eircom* to maintain a Code of Practice concerning the provision of services for people with disabilities and shall periodically review and, where appropriate, amend the Code in consultation with the National Disability Authority (NDA) and other representative bodies.

This document sets out *eircom's* "Code of Practice for the Provision of Services to Users with Disabilities ("Code")." The Code will be published by eircom.

¹ Regulation 6 (1) The Regulator may with the consent of the Minister, specify obligations applicable to designated undertakings, designated for the purpose of ensuring that disabled end-users can enjoy access to and affordability of publicly available telephone services, including access to emergency services, directory inquiry services and directories, equivalent to that enjoyed by other end-users. Regulation 6 (2) The Regulator may specify the terms and conditions to be complied with by designated undertakings for the purpose of ensuring that disabled end-users can take advantage of the choice of undertakings and service providers available to the majority of end-users.

The Code is set out as follows:

Section 1 - provides a statement of eircom's policy to deliver services to users on an equitable basis;

Section 2 - outlines the scope of this Code;

Section 3 - details the range of services eircom currently provides for users with disabilities;

Section 4 - highlights areas for action by eircom in the provision of services to users with disabilities;

Section 5 - proposes a number of next steps;

Appendix 1 - provides information on the consultation process with disability representative groups;

Appendix 2 - outlines eircom's HR diversity policy.

Appendix 3 – outlines the relevant legislation.

Section 1 - Overview of eircom's Policy

eircom will endeavour to remove the barriers preventing users with disabilities from enjoying access to, and affordability of the publicly available telephone services provided by eircom.²

eircom will, on foot of this Code, draw up a programme of actions for implementation against which eircom will monitor its performance and achievements.

eircom will continue to contribute to the development of inclusive access through a process of continuous dialogue with representatives of users with disabilities and implementation of policies and services arising from this dialogue.

² *eircom* would encourage other electronic communications operators to pursue the same goal and it notes the wish expressed in S.I. 308 of 2003, Regulation 6 (2) to allow users with disabilities to “take advantage of the choice of undertakings and service providers available to the majority of end-users.”

Section 2 - Scope of the Code of Practice

This Code covers existing eircom practices in terms of Customer Premises Equipment ("CPE"), customer services (sales, directory enquiries, fault reporting and repair) and the provision of specific network services to customers with disabilities. This Code applies to all 'end-users' - Consumer or Business.

The definition of a user with a disability is a person with a physical, intellectual, sensory disability who requires the provision of specialised services to enable them to enjoy access to the range of publicly available telephone services where:

- **Physical disability** refers to the physical capacity which affects mobility;
- **Sensory disability** refers to an impairment of the senses i.e. sight , speech and hearing;
- **Intellectual disability** refers to an impaired learning ability that prevents people from developing the range of physical and social skills usually found in a person of that age.

eircom has adopted a number of guiding principles which it believes are important for the development of services to users with disabilities. These are:

- **Access** - people who experience disabilities have equal rights to access and use the physical environment, information, communication and services provided by electronic communications operators;
- **Equity** - users with disabilities should be treated equally with all other end-users and eircom's policies should reflect this;
- **Inclusion and participation** - all users, including those with disabilities, have the right to live in an inclusive community and to participate in that community. The provision of publicly available telephone services is a vital facilitator for this inclusion and participation;

- **Diversity** - users with disabilities have both the knowledge and the right to define themselves. The range and diversity of users with disabilities will be reflected in eircom's policies, will be guided by the views and advice of the 'Disability Service Forum' and will be sufficiently flexible to meet their differing aspirations and goals;
- **Mainstreaming** – the provision of publicly available telephone services to users with disabilities, where possible, should not exist on a separate marginalised platform. The provision of publicly available telephone services should respect the principles of inclusion and equity and therefore these services will be provided within the mainstream provision of publicly available telephone services by eircom;
- **Legislation** – the provision of services by eircom to users with disabilities will be in accordance with the legislation, as set out in Appendix 3 hereto.

Section 3 - Current eircom services for users with disabilities

The current range of services provided by *eircom* to users with disabilities includes:

For users that are deaf or hard of hearing

- Inductive couplers which allow users with a hearing aid set to connect the set to their telephone in order to allow them to hear incoming speech clearly.
- Amplified phones which allow the user to increase the volume of incoming speech.
- Teleflash Visual Alert which shows a flashing light, or makes a loud noise when the telephone rings.

For users that are deaf or hard of hearing and/or speech impaired

- A Text Relay Service providing facilities for the receipt and translation of voice messages into text and the conveyance of that text to the textphone of customers of any operator, and vice versa.
- Eircom NAD (DeafHear (formerly National Association for the Deaf) programme providing a discount for those registered with DeafHear)
- Pricing of the eircom NAD Programme below are correct as of July 2009.

Part 15.4
eircom NAD Programme
(National Association for the Deaf)

| Number of Persons | Discount | Discount per Month (€) | Max Discount per Year (€) |
|-------------------|----------|---------------------------|---------------------------|
| 1 | 70% | up to a maximum of €17.14 | €205.68 |
| 2 | 70% | up to a maximum of €34.28 | €411.36 |
| 3 | 70% | up to a maximum of €51.54 | €617.04 |
| 4 | 70% | up to a maximum of €68.56 | €822.72 |
| 5 | 70% | up to a maximum of €85.70 | €1 028.40 |

Notes :

- ¹ This discount is on phone calls, this does not include the cost of the line or equipment rental
- ² As this programme is funded by eircom but is offered and co-ordinated by the National Association for the Deaf (NAD), to qualify for the eircom/N.A.D programme an application has to be made to the National Association for the Deaf.

For users with limited dexterity or mobility

- Push button telephone sets with speed and automatic redial buttons allowing pre-programmed telephone numbers (typically the most called numbers) or last called telephone numbers to be dialled without having to re-enter the telephone number.
- Hands free/loudspeaker phones means that the handset does not need to be used at all.

For users with restricted vision

- Restricted vision telephone sets with a raised dot on the central number (5) which assists people with restricted vision to find other numbers more easily.
- Braille billing to enable users to receive their telephone bills in Braille free of charge.

For users unable to use the phone book because of a disability

- Special directory enquiry arrangements which allow those users unable to use the phone book because of a disability, to use *eircom's* directory enquiry service free of charge;
- This service is funded by eircom. Applications must be to eircom by dialling 1800 574574.

eircom also provides a dedicated section on its website, www.eircom.ie, which is accessible from the homepage, which sets out information on the services that maybe of particular interest to people with disabilities (www.eircom.ie/disabilityservices).

eircom will periodically review and, where appropriate, amend the Code in consultation with the National Disability Authority (NDA) and other representative bodies.”

Training guidelines and communication

eircom has designed an online brochure to assist employees who are working with customers with a disability. The brochure provides guidelines on reasonable accommodation measures, consulting with customer needs and correct language. This brochure is available to all staff via the organisations intranet.

In addition, eircom has contributed to the ComReg/NDA Guide for people with disabilities and older people. eircom also provides a dedicated section on www.eircom.ie accessible from the homepage, which sets out information on the services that maybe of particular interest to people with disabilities (www.eircom.ie/disabilityservices).

Through an initiative of the NDA/ComReg Disability forum eircom has undertaken further training in all major customer interfacing areas and this now forms part of induction training of all staff entering eircom. The training programme was drawn up in conjunction with REHAB.

Section 4 – Aspirations and Actions

Improve disability awareness among eircom's management and staff

- Ensure that the guiding principles listed above are communicated to all eircom staff.
- Ensure that induction training for staff raises awareness and outlines responsibility to treat all end-users equally
- Ensure staff are aware of the most recent legislation governing the provision of services to users with disabilities;
- Educate customer facing staff on issues of importance and sensitivity to users with disabilities through recognised training sessions conducted by the appropriate disability representative bodies;
- Continue to enforce eircom's diversity and equal opportunity policy in relation to staff with disabilities;

Ensure ongoing consultation with disability representative groups – Disability Service Forum

- Establish an internal Disability Service Forum. This forum will consist of key members of staff from who will liaise regularly with key representatives of disability representative groups in Ireland;
- Develop a terms of reference for the internal 'Disability Service Forum' which would include:
 - Number of meetings;
 - Programme of issues for discussion/exploration;
 - Monitoring implementation of this Code.

Improve access to information about eircom's range of products and services for users with disabilities

- Ensure that information provided by eircom on its products and services is 'inclusive' in that it meets the needs of users with various disabilities.

eircom's approach will be to ensure that it provides information to all end-users through a combination of the print media, the broadcast media, postings on the *eircom* website and inserts in telephone bills sent to *eircom* customers. This will be progressed by the internal 'Disability Service Forum'.

- Ensure that the information on the *eircom* website is both highly visible and accessible for users with disabilities. This could be achieved through a "web accessibility audit" by a recognised public/private body. A new *eircom* website is in progress and will involve relevant bodies via the 'Disability Service Forum'
- Update information on *eircom's* website to reflect the changing nature of the services provided to users with disabilities and include information about *eircom's* dedicated resources.

Improve access to *eircom's* products and services

- ensure that all CPE provided by *eircom* to end-users incorporates current best practice in 'design for all' principles;³ This will be progressed by the internal 'Disability Service Forum'
- provide assistance and guidance to customers with disabilities when sourcing appropriate CPE. This will be progressed by the internal 'Disability Service Forum'
- ensure 'design for all' principles are adequately included in *eircom's* future provision of public pay telephones.

³ Note that *eircom* is reducing the extent to which it supplies CPE, does not manufacture its own CPE and relies on the provision of CPE from external suppliers.

Section 5 – Next Steps

- Establish the internal Disability Service Forum (within three months of publication of this Code of Practice);
- Begin implementation of the “areas for action” identified above (as per recommendations of the internal Disability Service Forum);
- Develop an implementation timetable and review period (as per recommendations of the internal Disability Service Forum);

Appendix 1 Consultation Process

The original code was drawn up in 2003 in consultation with the below bodies. This code was reviewed by the NDA before publication.

| <i>Name of Company</i> |
|-------------------------------------|
| NDA |
| IDS |
| NCBI |
| Ahead |
| NRB |
| Institute for Design and Disability |
| People with DB Irl |
| DB Fed Irl |
| Forum for People with DB |
| DeafHear |
| Irish Wheelchair Assoc |
| Irish Hard of Hearing Assoc |
| Comhairle |

Appendix 2 eircom's HR Diversity Policy

Policy Statement.

eircom respects and values the diversity among our employees and all those with whom we do business

eircom is committed to creating and maintaining a work environment which does not discriminate, directly or indirectly, on grounds of gender, marital status, family status, sexual orientation, religious belief, disability, race or ethnic origin, membership of the Traveller Community and age.

Decisions on recruitment, selection, pay, terms and conditions, training and development, promotion, performance appraisal, access to benefits and termination of employment will be based solely on objective and business related criteria.

Every employee is expected to conduct him / herself with high standards of courtesy and consideration in the workplace, at work related events, and when doing business on behalf of eircom.

It is the responsibility of each business area manager to monitor this policy and ensure that it is complied with and that best practices are maintained.

Appendix 3 Relevant Legislation

1. Directive 2002/22/EC of 7th March 2002 on Universal Service and Users Rights relating to Electronic Communications Networks and Services (Universal Service Directive).
2. European Communities (Electronic Communications Networks and Services) (Universal Service and Users' Rights) Regulations, 2003, Statutory Instrument Number 308 of 2003.
3. Decision Notice D17/03 of the Commission for Communications Regulation dated the 25th July 2003 on the provision of Telephony Services to Users.
4. Decision Notice D06/32 of the Commission for Communications Regulation "The Future Provision of Telephony Services Under Universal Service Obligations"