

Consultation Response

Smart Metering Implementation Programme: In-home display (Ofgem) 28 October 2010

About us

We're RNID, the charity working to create a world where deafness or hearing loss do not limit or determine opportunity and where people value their hearing. We work to ensure that people who are deaf or hard of hearing have the same rights and opportunities to lead a full and enriching life. We strive to break down stigma and create acceptance of deafness and hearing loss. We aim to promote hearing health, prevent hearing loss and cure deafness.

Our response will focus on key issues that relate to people with hearing loss. Throughout this response we use the term 'people with hearing loss' to refer to people who are deaf, deafened and hard of hearing. RNID is happy for the details of this response to be made public.

Comments

RNID welcomes the opportunity to comment on the smart metering plans for the in home display (IHD). We have only responded to issues that are most relevant to RNID and the people with hearing loss we represent.

We agree that ambient feedback is useful for people who prefer information in a visual format. Consumers should be able to choose which format they prefer the information to be displayed in.

We also agree with Ofgem that the consumer must be consulted on the location of the in home display to ensure that it is accessible to them.

We believe it is vital that the obligations state a requirement for suppliers to make their IHDs accessible to people with a disability. The proportion of people with a disability increases with age, and with

our ageing society it is important that suppliers build accessibility features into their products. Many older people have more than one disability or long-term condition. For instance, RNID's 2008 annual survey of members found that 57% of those members aged over 65 who responded had a disability or long-term condition that limits their daily activities as well as their hearing loss. Many of RNID members have mobility problems in addition to their hearing loss, and there is a significant body of evidence that links hearing loss with an increased chance of mental health problems such as depression. These disabilities may combine to form additional barriers to accessing services and products. For instance, a deaf person who also has some sight loss will find it more difficult to access information.

Although the design of the IHD may be covered by the Equality Act 2010, this requires individuals to complain and take legal action when the equipment is not suitable. We believe that suppliers must be proactive in designing accessible technology.

To ensure that the equipment is accessible, we would suggest including a requirement for consumer testing of IHDs, involving people with disabilities.

We support the sharing of best practice for IHDs to ensure a high standard of design for all.

Conclusion

We would recommend that all suppliers ensure that accessibility is designed into every IHD. This would ensure that everyone can access smart metering technology, and reduce the requirement for specialised equipment. We would therefore like to see all suppliers, or Ofgem, undertaking consumer testing of the current IHDs. This will then enable best practice to be shared.

Contact details

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