



department for
**culture, media
and sport**

Supporting Vulnerable Consumers with targeted assistance at and after Digital TV Switchover

A paper by the Consumer Expert Group
on digital switchover for the Department
for Culture, Media and Sport and the BBC

April 2006

Our aim is to improve the quality of life for all through cultural and sporting activities, support the pursuit of excellence, and champion the tourism, creative and leisure industries.

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Membership of the Consumer Expert Group

As of the publication of this report, the following individuals were members of the Consumer Expert Group:

Leen Petré, Royal National Institute of the Blind, Chair

David Sinclair, Help the Aged, Vice-Chair

Alison Hopkins, National Consumer Council

Len Coulthard and Eunice Walker, Action with Communities in Rural England

Gerry Stallard, Hearing Concern/RNID

Mark Morris, RNID

Gretel Jones, Age Concern

Katie Hanson and Roy Staines, Sense

Tony Herbert, Citizens Advice

Ruth Myers, TAG

Barry Hobbs, Wireless for the Bedridden

Carole Garfield, Rural Community Council Network

Voice of the Listener and Viewer

Renewed remit of the Consumer Expert Group (CEG) Autumn 2005

1. To advise Government and Digital UK on:
 - the content of its planned communication with consumers to explain why the UK is switching to digital television.
 - ways of ensuring that communications reach all consumers, particularly people who are socially or geographically isolated.
 - communications for support scheme projects.
2. To assess what role CEG members and other consumer groups can undertake in communicating switchover to consumers.
3. To raise any issues that might arise for consumers in relation to the implementation of Digital Switchover.
4. To write any reports that are deemed necessary to fulfil this remit. Government and Digital UK will give due consideration to and respond to the reports and other advice received from the Consumer Expert Group.

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Summary and Recommendations

The Consumer Expert Group recommends that:

1. The specification of the support package for vulnerable consumers should not be set as a result of what funding is currently allocated, but that the details of the targeted assistance scheme for vulnerable groups should be determined in relation to the level of need of vulnerable people.
2. The target population for the Government's targeted assistance scheme for vulnerable groups should be extended to also cover households where one person is partially sighted.
3. The Consumer Expert Group is unconvinced that the means-tested approach for the targeted assistance scheme for vulnerable groups is the best way of ensuring that vulnerable consumers receive the support they need at switchover.
4. We believe that there are significant benefits to be gained from offering a single support package under the targeted assistance scheme for vulnerable groups which includes only limited choice over the type of set top box for vulnerable consumers.
5. We do not believe that consumers should be offered a voucher which can be redeemed against any set top box on the market under the targeted assistance scheme for vulnerable groups. We would consider a voucher scheme as a possible alternative only if it was used in conjunction with public procurement and only if the vouchers could only be used to buy boxes which met the specifications set out in Consumer Expert Group Report "Digital TV equipment: vulnerable consumer requirements".
6. Vulnerable consumers should have a choice of platforms under the targeted assistance scheme for vulnerable groups but we believe that no vulnerable consumer should get a lower quality of equipment, information and support if they choose a platform other than DTT.
7. The Consumer Expert Group is very concerned that the announcement of digital switchover and the subsequent publicity will offer new opportunities for rogue traders, particularly with regard to aerial installations, and distraction burglars possibly gaining entrance on the pretence of retuning the television. To minimise this risk we strongly support the development of the digital installer scheme and the use of the digital logo.
8. Similarly any specific help to vulnerable households will need to pay particular attention to matters of security to protect these households. The Consumer Expert group recommends that the body implementing the targeted assistance scheme for vulnerable groups adopts the processes that were used by the Channel 5 retuning operation to ensure as far as possible that any opportunity for the exploitation of older households is minimised.
9. Installers and helpline staff must have disability and age awareness training before helping older and disabled people.
10. It is vital that the targeted assistance scheme for vulnerable groups should be accompanied by an adequate free helpline. It should also be accompanied by an appropriate instruction package and user guide. This guide should be in a number of different languages and formats as outlined in the Consumer Expert Group report "digital TV equipment: vulnerable consumer requirements". Government must ensure that both vulnerable support services and associated information provision is accessible to those who do not speak English.
11. Aerial installers used as part of the targeted assistance scheme for vulnerable groups, should be members of the recently launched approved aerial installers scheme.
12. Beneficiaries of the targeted assistance scheme for vulnerable groups should be able to nominate a third party who would organise delivery and installation on their behalf and be the contact point.

13. People covered by the targeted assistance scheme for vulnerable groups should be provided with set top boxes 9 months ahead of switchover to leave an adequate lead time; It will clearly be vital to begin to develop the list of eligible consumers well in advance, and we recommend this is done at least 18 months before switchover.
14. Switchover installation support and home visits under the targeted assistance scheme for vulnerable groups must remain live for at least 1 year after switchover has been completed, and the helpline support should remain available for 18 months.
15. The opinion of the Disability Rights Commission should be sought on how best to identify the people with disabilities for the targeted assistance scheme for vulnerable groups who are not currently claiming DLA/AA.
16. The targeted assistance scheme for vulnerable groups should be available in all housing contexts, including housing situations with communal TV viewing, as long as one person living in the accommodation meets the eligibility criteria.
17. It will be necessary to set cut-off dates for eligibility for access to a targeted assistance scheme for vulnerable groups programme. The Consumer Expert Group suggests that every person across the UK who was born in or before 1937 and therefore turns 75 or more in 2012, the year when the last region switches to digital, should be considered eligible for the targeted help scheme.
18. There should be a clear duty on the Government to get in touch with people who are eligible for the targeted assistance scheme for vulnerable groups.
19. The Government has to give the targeted assistance scheme for vulnerable groups the possibility of using central databases that help identify people who would be eligible for targeted help. Data protection issues should not stand in the way of doing this.
20. The Government should monitor take-up of the targeted assistance scheme for vulnerable groups against target figures calculated on the basis of disability prevalence and size of the older population.
21. Current plans for help with installation will not include all those who may need it. The current scope of the Government's planned support for vulnerable consumers of implementing the targeted assistance scheme for vulnerable groups is too restrictive and should be extended with further schemes to cover other groups that would not be eligible for the targeted assistance scheme. Further work needs to be done to work out how households with people aged 65+ be provided installation assistance, and what role trusted volunteer assistants can play in helping them come to grips with the new technology.
22. Digital UK and Ofcom must closely monitor takeup amongst low income consumers. If the future levels of takeup of digital TV amongst low income consumers prove to be cause for concern, the Government must reconsider providing additional support for low income households.
23. Delivering support to the most socially isolated will be very important. The Consumer Expert Group recommends that the government monitors closely if the statistics on the uptake of digital TV would identify a section of the population other than disabled people and people over 75 who may need further support because of social isolation.
24. Volunteers will have a key role to play in delivering support and information for vulnerable groups both before, at and after switchover, but the voluntary sector simply does not have the capacity to provide this support without adequate funding.
25. The DCMS should draw up a budget to facilitate the involvement of volunteers as "trusted assistants" who can visit vulnerable consumers just before and after switchover to provide peer support with using the new technology.
26. This paper should be disseminated by the DCMS to PKF, who are currently reviewing the BBC's bid for an increased licence fee settlement.

1. Background

In July 2004, DCMS Secretary of State for Culture, Media and Sport, Tessa Jowell MP asked Ofcom's consumer panel to consider what measures might be necessary to ensure the protection of vulnerable consumers at switchover. Subsequently, the Ofcom Consumer Panel recommended that:

"SwitchCo, [...] should develop a process – working closely with the voluntary sector and local government – to identify people in need of help through switchover and provide a scheme offering practical support. We estimate that a national scheme along these lines could cost in the region of £110m.

Financial assistance should be offered to people currently eligible for TV licence fee exemptions or concessions (people over 75 or registered blind) in order to meet the costs of one-off purchases of equipment and any necessary aerial upgrade work needed to make the transition to digital. We estimate that the costs of such assistance could lie between £134m and £270m."

The Labour Manifesto, published earlier this year, gave a firm commitment to a timetable for digital switchover of 2008 to 2012 and on 15th September 2005, the Government confirmed this timetable and announced the scope of a support scheme for the most vulnerable households which would ensure that:

- *"help will go to all households with one person aged 75 or over;*
- *help will go to all households with one person with a significant disability (receiving attendance allowance, disability living allowance);*
- *help will be available free of charge to households with one person aged 75 or over/disabled households receiving pension credit, income support or jobseekers allowance; other households will pay a modest fee;*
- *specific support for households where one person is blind.*

Assistance will consist of providing the necessary equipment to convert one TV set and the relevant support to install and use the equipment. Equivalent arrangements will be made to provide assistance if a different platform for receiving digital is opted for"

The DCMS press release added "Further details of how the scheme will operate in practice need to be developed by the BBC and the Government."

This paper sets out the views of the Consumer Expert Group as to the nature of the support package (also called the "targeted help scheme") being offered to specific vulnerable consumers during the process of switchover, and makes a series of recommendations for the Government and the BBC and the body that will be implementing the targeted assistance scheme for vulnerable groups.

If Digital Switchover (DSO) is to be successful, it will require both the Government and the BBC, as well as the body implementing the targeted assistance scheme for vulnerable groups, to pay careful attention to the practical needs of vulnerable viewers. Although the BBC's current estimates for the future level of the licence fee include some aspects of DSO, they do not include the costs for the Government's plans for the targeted assistance scheme for the aged and the disabled. Although several of the organisations represented on the Consumer Expert Group still consider that the costs for vulnerable viewers should be borne either by the General Exchequer, or from the budget of the Department of Work and Pensions, nevertheless the Consumer Expert Group considered that it would still be valuable for it to provide the DCMS and the BBC with a detailed assessment of the full needs of vulnerable viewers if DSO is to be successful. In our view, it would also therefore be valuable for this paper to be seen by PKF, which is currently reviewing the BBC's bid for an increased licence fee settlement.

The Consumer Expert Group believes that the specification of the support package for vulnerable consumers should not be set as a result of what funding is currently allocated, but that the details of

the support package should be determined in relation to the level of need of vulnerable people.

For the purposes of this report, the Consumer Expert Group sees “vulnerable consumers” and “those eligible for targeted assistance scheme for vulnerable groups” as the two different groups of people, with the focus of this report being on the 2nd group.

2. The target population for the targeted assistance scheme for vulnerable groups.

The Consumer Expert Group agrees with the Government’s intention to provide support to households in which at least one person is over 75, and households in which at least one person has a significant disability, as well as providing specific support for households in which at least one person is blind.

The target population of the targeted assistance scheme for vulnerable groups should be extended to cover, in addition, households in which at least one person is partially sighted; as very similar needs and issues will arise from digital switchover for partially sighted people, as will for blind people.

In addition, we believe that the current scope of the Government’s planned support for vulnerable consumers is too restrictive and should be extended with further schemes to cover other groups that would not be eligible for the specific targeted assistance scheme.

We are concerned that help with installation will be necessary for people outside the targeted assistance scheme for vulnerable groups. In the Ferryside and Llansteffan digital switchover technical trials conducted by DCMS it was found that nearly as many households with people aged 65+ required assistance with installation as those with people aged 75+. Further work needs to be done to work out how households with people aged 65+ can be provided installation assistance, and what role trusted volunteer assistants can play in helping them come to grips with

the new technology.

The Ofcom Consumer Panel, in their report to the Secretary of State in November 2004,² argued that support was necessary for the most isolated. Isolation does not currently feature as a measure of vulnerability within the Government’s proposed support package. The Consumer Expert Group agrees with the Ofcom Consumer Panel, that delivering support to the most isolated will be very important. The Consumer Expert Group recommends that the DCMS consider whether further research would enable them to identify sections of the population who may need further support, as a result of their isolation.

The current proposals of the targeted assistance scheme for vulnerable groups do not include free support for many people on low incomes (including over 65s on low incomes or other disadvantaged groups). Recent research for Age Concern has noted that older people on low incomes are worried about how they will pay for digital switchover.

An up-coming expense that several pensioners expressed concern over was the fee associated with the advent of digital TV. Most were heavily reliant on the television for entertainment and were unsure about the cost implications of switching over to digital. **‘Everybody’s got to go digital soon. And how are you going to pay for that?’³**

Through its regular monitoring of takeup of digital TV, Government, Digital UK and Ofcom must closely monitor takeup amongst low income consumers. If the future levels of takeup of digital TV amongst low income consumers prove to be cause for concern, the Government must reconsider providing additional support schemes for low income households.

Similarly, if the monitoring of takeup data provides evidence that other sections of the community are failing to takeup digital TV, Government should consider how they can best support these groups.

The Consumer expert group believes that it is important that responsibility for the administration of

the targeted assistance scheme for vulnerable groups must be clearly assigned.

3. Means testing for targeted assistance

The Consumer Expert Group is unconvinced that a means-tested approach is the best way of ensuring that vulnerable consumers receive the support they need under the targeted assistance scheme for vulnerable groups at switchover. We believe that a means tested approach could lead to problems in ensuring take-up of support by eligible people and we do not believe it is the fairest approach.

The Government has argued that they will contact vulnerable groups eligible for the support under the targeted assistance scheme for vulnerable groups by writing to those receiving means tested benefits. The weakness of this is that there remain significant numbers of vulnerable households who do not claim the means tested benefit they are entitled to. This will create significant problems in ensuring take-up of the Government's package of the targeted assistance scheme for vulnerable groups.

For example, despite millions of pounds of investment in take-up campaigns, over 1 million pensioner households still fail to claim pension credit. The latest accurate figures, published in January 2006 revealed that by the end of 2003/4⁴ non-takeup of pension credit was 47%, representing over 2 million entitled non-recipients of Pensions Credit. The quarterly estimates paint a similar picture.

Whilst on face value, a means tested approach may appear fairer in terms of providing most benefit to those on low incomes, there are concerns about this approach. The limitations of a means tested approach to support have been demonstrated by the experience of the Warm Front Programme, where the National Audit Office has noted that the linking of assistance to receipt of means tested benefits, has led to it being

less well-targeted at the most in need than it might otherwise have been.

One of the reasons why Government struggles to ensure take-up of means tested benefits is the complexity of the system.

*'Many pensioners and those that advise them consider the systems and administrative procedures for claiming benefits to be too complex. In all there are 23 potential entitlements for pensioners, with 36 linkages between 16 of them.'*⁵ National Audit Office

The current benefit system for older people is extremely complicated for older people and many pensioners find the process of navigating the benefits system a less than pleasant one. Although the Pension Service has made efforts over the past few years to improve and simplify the service it provides many problems still exist.

Clearly means testing becomes more and more complex as more pass-ported benefits are supported by Government.

If the Government is intent on pursuing an approach which links support to the receipt of means-tested benefits, then efforts must still be made to reach those who are entitled non-recipients of benefits. To this end we would welcome the inclusion of information in letters going to potentially eligible consumers who are not in receipt of income related benefits, to enable them to claim their entitlements – along the lines of a paragraph saying "if you believe you might be eligible to VVV benefit, please contact XXX (relevant benefit helpline number)."

4. The equipment for targeted assistance

"My old TV is packed up and I need to buy a new one – a big investment for me. On going round the stores I found myself a bit bemused. Do I want widescreen where some people look squashed as in a distorted mirror? Will this be obligatory in future? I looked at an analogue set and nobody said it would be switched off

in the future. There was mention of 'a box'. It seemed nobody had time to explain anything."

Letter to Help the Aged

In January 2006, the Consumer Expert Group produced a paper (The user requirement specification for Digital TV receiving systems for vulnerable consumers⁶) which set out our views on the specification of the equipment to be provided by Government under their proposals for the targeted assistance scheme for vulnerable groups. The Consumer Expert Group believes that these specifications are both necessary and achievable.

We believe that Government support for these specifications could play a vital part in driving forward demand and supply for accessible Digital TV technology.

Whilst we appreciate that technology will change over the time of switchover, we believe that there are significant benefits to be gained from offering a single support package which includes only limited choice over the type of set top box for vulnerable consumers.⁷

We do not believe that consumers eligible for the targeted assistance scheme for vulnerable groups should be offered a voucher which can be redeemed against any set top box on the market for the following reasons:

- There is currently inadequate consumer information at point of sale of DTT boxes and it is difficult even for the most technically astute individual to rationally decide between certain boxes
- There would be a significant risk that older and vulnerable individuals would end up with set top boxes which do not meet their needs
- The introduction of choice would undermine the potential positive impact on supply and demand of a government supported box with accessibility features
- The introduction of choice would reduce the potential for using economies of scale to drive down the cost of boxes with accessibility features

- It would make the installation and after-installation support very complex as potentially all brands and models would have to be known by the installers and helpline staff.

However, there is a case for some freedom of choice for consumers and an alternative could be to offer a choice of two set top boxes. We would only consider a voucher scheme as a viable alternative if it was used in conjunction with a public procurement strategy to drive up supply of boxes with accessibility features and only if the vouchers could only be used to buy boxes which met the specifications set out in *The user requirement specification for Digital TV receiving systems for vulnerable consumers*⁸. As far as we are aware there is no current logo/labelling system that meets our requirements in these areas (the digital tick is clearly not sufficient in this regard).

Whilst we acknowledge the importance of individual choice, we believe it needs to be borne in mind that ultimately people over 75, and those from households where one person is severely disabled, blind or partially sighted, will have the option, if they are particularly concerned to have a different box, to purchase whatever product they choose in the high-street, just like other consumers.

However we believe it is acceptable to make clear that if they accept the targeted assistance scheme for vulnerable groups, then this will cover installation of a specific government box rather than installation or support for just any box that they would purchase themselves from the high street.

5. To DTT or not DTT under targeted assistance

It is essential that vulnerable consumers should have a choice of platforms. In addition, it is clear that cable, broadband and satellite operators expect platform neutrality from any government policy. And, of course, DTT will not be universally available.

That said, the early Bolton trial results indicate that the majority of older and disabled people chose DTT. If this is representative across the country, there will only be small numbers of vulnerable consumers who do not choose DTT.

However, this raises a question as to how the government's the targeted assistance scheme for vulnerable groups will provide for those who don't want DTT. Two considerations have to be borne in mind in this respect:

Firstly, to be included in the targeted assistance scheme for vulnerable groups, the equipment provided should – irrespective of the platform it is designed for – always meet the criterion set out in the Consumer Expert Group TV equipment specification.⁹

Secondly, when it comes to support with usage and installation of equipment, Cable, Satellite and Broadband TV providers clearly have their own technical support and, given the consumer will be paying a regular subscription, they should be entitled to receive appropriate support. The Cable, Satellite and Broadband companies also have a financial incentive to ensure that their users are satisfied with the equipment they have and are able to use it. However, anecdotal evidence suggests that this standard support package is not always suitable for vulnerable groups: for example blind and partially sighted people, do not always get an explanation of audio description when their systems are installed.

If a free-to-view satellite option (freesat) is chosen by some vulnerable consumers to switch over to digital TV, there is no ongoing subscription relation with the provider, and free ongoing support might not be available.

Even if we assume that those who do not chose DTT will be provided with some support by the relevant companies, there may still be a need for some practical support to help all new customers deal with the new technology.

We believe that no vulnerable consumer under the targeted assistance scheme for vulnerable groups should get a lower quality of equipment, information and support because they had chosen one means of receiving digital television over another. If suitable equipment (as defined by the Consumer Expert Group report on "Digital TV equipment: vulnerable consumer requirements") and support are not available from cable, satellite or broadband providers, then these other platforms should not be offered to people under the Government vulnerable consumer support scheme.

However, if suitable equipment and support is available on either or all of these platforms, then they should be offered as an option under the targeted assistance scheme for vulnerable groups.

6. The installation service for targeted assistance

The Consumer Expert Group is very concerned that the announcement of digital switchover and the subsequent publicity will offer new opportunities for rogue traders, particularly with regard to aerial installations, and distraction burglars possibly gaining entrance on the pretence of retuning the television. This can be a particular problem in rural communities where people do not have the same access to networks and friends and family as those living in urban areas. Further because it is often more difficult for inhabitants to find someone willing to travel to remote villages and hamlets it can be easier for rogue traders to find work. Local police, Government and trading standards officers must be on their toes to monitor local activity and must ensure that any such activity is cracked down upon.

To minimise this risk we strongly support the development of the digital installer scheme and the use of the digital logo, particularly with regard to aerial installers but clearly this needs to be promoted as soon as possible and be widely advertised if people are to know what it means and its value.

Similarly any specific help to vulnerable households will need to pay particular attention to matters of security to protect these households. The Consumer Expert Group recommends that the body implementing the targeted assistance scheme for vulnerable groups adopts the processes that were used by the Channel 5 retuning operation to ensure as far as possible that any opportunity for the exploitation of older households is minimised. As well as running security checks before employing staff, explanatory letters explaining eligibility should be sent to the households to be helped before anyone calls. These letters should include specific advice on the care the householder should take before letting a stranger into the house and to give a personal password so that the householder can be sure the caller is a bone fide digital installer. Blind and partially sighted people, should receive a telephone call or audio tape in addition to written communication. Audible communication works best for these people, as it can not be assumed that all blind and partially sighted people would read Braille or would have a sighted assistant to read their mail.

Installers employed to implement the targeted assistance scheme for vulnerable groups should have identity cards with their photograph and details in large font and a telephone number for the householder to make a verification check if they want to. They should also have the information in Braille in the same way as the CORGI ID cards do. It would also be helpful if the project could liaise with the local police, the local trading standards department and local voluntary agencies such as Age Concern in advance to let them know they will be operating in the area. Given the more limited number of trusted advice sources available in rural areas, the body implementing the targeted assistance scheme for vulnerable groups will have to ensure it determines the main sources of information in rural areas. It would be helpful if representatives of rural community or parish councils could be represented on the Digital UK regional forums.

Unpublished case studies of installation undertaken on behalf of the RNIB show that for the older blind and partially sighted people that were visited:

- A home visit is required for those who will need help with installation;
- The installation process should begin by establishing very quickly that the audio and video connections to the TV are sound, followed by establishing the availability of a good reception. An indication of signal strength might even precede tuning in of channels;
- It is essential that installer takes some time to explain usage in plain language;
- The installer should give an explanation, demonstration and usage instructions for audio description;
- Appointments vary in length considerably depending on the technical challenges that are presented, and the ability of the customer to understand the instructions given to them;
- Whatever the quality of the box itself, the installation, training and demonstrating make an enormous difference to the perception of the product;
- The visit should be followed up with telephone contact a week later to check that everything is working as the customer expects;
- A second home visit will be required in some cases;
- A second person (family member or friend) should be encouraged to be there if possible in order that they can help the consumer remember the usage and features of receiver. This would also help reduce the risk and fear of rogue traders;
- If an installer has to change the room layout or lighting levels during installation, then care must be taken to ensure that everything is returned to the place and state it was in when the installer arrived; and
- The installer should ensure that all peripheral equipment is working and connected, for example if the user has a video recorder connected to their current TV, then this piece of equipment should be appropriately connected to the digital system.

Installers and helpline staff implementing the targeted assistance scheme for vulnerable groups must have disability and age awareness training before helping older and disabled people. This training can be delivered by variety of means, including face to face meetings or via training DVDs where the installer has to sign a declaration that he/she has watched the training material. Organisations representing older and disabled people should be consulted on the precise content and suitability of such training material. Some voluntary sector and commercial organisations already have such material. Different parts of Government may also have such materials (e.g. the ODPM have a training pack for community wardens on age issues). Similarly, other guides and materials are likely to be available, within public bodies, as part of their efforts to comply with their duty to promote equality of opportunity for people with disabilities.

7. Other support needed under targeted assistance

It is vital that the targeted assistance scheme for vulnerable groups should be accompanied by an adequate free helpline. It should also be accompanied by an appropriate instruction package and user guide. This guide should be in a number of different languages and formats as outlined in the Consumer Expert Group report "Digital TV equipment: vulnerable consumer requirements".

Government must ensure that both vulnerable support services and associated information provision is accessible to those who do not speak English.

The Consumer Expert Group believes that the deliveries of set top boxes to older people should be made by a postal service or by a specified installer when s/he comes to install the box. Consumers should be, at the least, notified in advance of the date and approximate timing of delivery and ideally should have the opportunity to choose a convenient delivery time.

The Bolton trial has highlighted that it is important for couriers to leave plenty of time for people to get to the door when boxes are being delivered. It is important that this experience is taken on board.

Older people and other vulnerable groups should not be expected to travel to a post office or other location to collect or choose a set top box. This is particularly important where collection facilities may only be accessible by car. This is relevant in both urban and rural locations.

If they prefer to have home visits, vulnerable consumers should be offered them. The Consumer Expert Group believes that people should only be visited at home, if they agree to this.

8. Selection of installers and identification of installers for targeted assistance

The Consumer Expert Group believes that aerial installers used as part of the targeted assistance scheme for vulnerable groups, should be members of the recently launched approved aerial installers scheme¹⁰ and they should be obliged to undertake extra disability and age awareness training.

We would recommend that best practice is exemplified in terms of ensuring that older and disabled people do not find themselves victims of distraction burglary or other related crimes (see above).

We would also recommend that beneficiaries of the targeted assistance scheme for vulnerable groups should be able to nominate a third party who would organise delivery and installation on their behalf and who could act as a contact point. We also believe that beneficiaries should be able to book a time slot for the installation, and not be expected to wait all day. The beneficiary should also be given a contact number for the installer.

9. Timing of targeted assistance support

The Consumer Expert Group is concerned that proposals to supply vulnerable groups with TV receivers under the targeted assistance scheme for vulnerable groups 6 months ahead of switchover will leave an inadequate lead time. We would prefer a minimum of 9 months, particularly in the larger switchover regions and in the parts of the region where DTT is available prior to switchover.

In areas where a digital signal is not available until the analogue signal is actually switched off, care has to be taken to ensure that the viewers eligible for targeted help suffer a minimum level of disruption to their TV viewing and can all be assisted at the right time without long waiting lists. In such cases, disruption can be minimised by installing the digital TV receiver before the switch happens but leaving it switched off whilst explaining that the recipients will have to watch analogue signals until switchover happens. At the time of switchover, telephone contact should be made with the user to ensure they have managed to switch the receiver to digital, with a further follow-up visit if necessary.

It will clearly be vital to begin to develop the list of vulnerable consumers eligible for the targeted assistance scheme for vulnerable groups well in advance of the 9 month deadline. The Consumer Expert Group believes that if the equipment is to be delivered on time then the development of the "eligible" list must begin at least 18 months before switchover for each region. The list will then need to be monitored to keep it up to date.

10. Long Term Support under targeted assistance

The Consumer Expert Group is concerned about how people will cope in the long term with the complexity of Digital TV. It is essential that there is long term

support for individuals. Switchover installation support and home visits under the targeted assistance scheme for vulnerable groups must remain live for at least 1 year after switchover has been completed, and the helpline support should remain available for 18 months.

Problems can arise such as Electronic Programme Guide (EPG) updates and channel changes which may confuse people. There will be a need to monitor the Bolton trial to test how people cope with such changes over a lengthy period and what means of long term support must be put in place to provide them with adequate assistance for these situations. While volunteers can resolve simple matters, only through experience can the more complex problems be identified and solved. For these there would appear to be no easy answer, other than professional help.

11. Assessing Disabilities for the targeted assistance scheme

For blind and partially sighted people, the CEG advises that being registered as blind or partially sighted should be the basis for being eligible for support under the targeted assistance scheme for vulnerable groups.

Where people with other disabilities are concerned, a problem with relying on the Disability Living Allowance and Attendance Allowance schemes for the targeted assistance scheme for vulnerable groups is that only a proportion of people who are actually eligible claim these benefits, and that getting an assessment under these schemes takes time. The opinion of the Disability Rights Commission should be sought on how best to identify the people with other disabilities without them having to approach government themselves in the first instance.

12. Targeted assistance in different housing contexts

The targeted assistance scheme for vulnerable groups should be available in all housing contexts, including

housing situations with communal TV viewing, as long as one person living in the accommodation meets the eligibility criteria.

Viewers, both those who are vulnerable and those who need no additional support, live in a range of different types of building. The problems of digital switchover will be especially difficult for those who live multiple dwelling units, such as blocks of privately-owned flats, which may house either tenants or leaseholders - or sometimes a mixture of both. Viewers living in these multiple dwelling units who share a communal receiving aerial will almost certainly need to upgrade it. In some multiple dwelling units they may also be limited in what they can do by the terms of their lease, or their tenancy agreement, although s.134 of the Communications Act also gives them some additional rights in this regard. All residents living in multiple-dwelling units will therefore need to be given clear technical and legal advice about the options open to them, and how to upgrade their aerial in the manner that is most suitable for the majority of residents in that building. Their decision may also depend on when and how the Government intends to complete its plans to make government information publicly available. Thus vulnerable viewers - be they older or in receipt of disability benefit, who the Government intends to be the beneficiaries of the targeted assistance scheme for vulnerable groups, may therefore need more extensive financial support than the modest amount envisaged by the Government before they can be in a position to switch to digital satisfactorily.

13. Date of Birth – Eligibility for the targeted assistance scheme

Even a relatively simple eligibility criteria for the targeted assistance scheme for vulnerable groups like age will prove problematic for the Government with any date automatically excluding people simply because they were born a day or a week earlier. This will undoubtedly create some bad feeling.

The Consumer Expert Group appreciates that it will be necessary to set cut-off dates for eligibility for access to a vulnerable support programme. However, we would urge whoever runs any support scheme to be flexible with their implementation of this criterion.

To avoid that people feel discriminated on the basis of the region they live in and to ensure that the message on eligibility can be simple and consistent across regions, the Consumer Expert Group suggests that every person across the UK who was born in or before 1937 and therefore turns 75 or more in 2012, the year when the last region switches to digital, should be considered eligible for the targeted help scheme.

14. Approaching the people eligible for the targeted assistance scheme

There should be a clear duty on the government to get in touch with people who are eligible for the targeted assistance scheme for vulnerable groups.

The administrators of the targeted help scheme should therefore be given access to central databases to help identify people who would be eligible. Data protection issues should not stand in the way of doing this.

Examples of databases that could be useful are:

- data identifying people born in 1937
- local authority data identifying who is registered blind or partially sighted
- free TV Licence database
- data identifying those with another severe disability
- DWP Pension/Pension Credit database

However, we recognise that this system might not be fully fool-proof and therefore the availability of the targeted help scheme should be widely promoted via the following routes.

- In clear and understandable national and regional TV and radio adverts referring to a national freephone number people can ring to claim the targeted help should they not have been contacted.
- Via the digital UK helpline: when people call the helpline, the first question they should be asked is whether they or someone in their household is born in 1937 or before or whether anyone in their household has a severe disability, is registered blind or partially sighted. If the answer to any of these questions is "yes" they should be advised to ring the national freephone number people can ring to claim the targeted assistance scheme for vulnerable groups should they not have been contacted.
- Via publications and groups that are in touch with people eligible for the targeted help scheme, for example:
 - talking newspapers, local societies and RNIB publications and resource centres for blind and partially sighted people
 - specialist magazines produced by the large disability organisation for their membership such as MS Matters magazine, Disability Now
 - publications for older people such as Saga magazine, Choice magazine, Help the Aged and Age Concern publications
 - publications for social care workers and other professionals working with disabled people
 - through e.g. Age Concern centres; day centres; drop in centres; older peoples forums

15. Ensuring high takeup of the support programme

The Government should monitor take-up of the targeted assistance scheme for vulnerable groups against target figures calculated on the basis of disability prevalence and size of the older population.

A recent report by the Social Exclusion Unit¹¹ in the

ODPM noted that there was a strong case for Government to make payments of benefits in a more "automatic" way. Any system which (as much as possible) of delivering vulnerable support to eligible beneficiaries should take this on board and look for ways in which the delivery of the support can be as automatic as possible and not require an application process or form filling by the vulnerable consumer.

One problem faced by public, voluntary and private sector bodies interested in providing advice, information and support for older people and people with disabilities is the complexity of the services many older people have to access.

Forthcoming research by Help the Aged¹² will set out some of the reasons why services remain inaccessible to older people. The findings and conclusions are highly relevant to the services proposed for the support package and should therefore be taken into account in the design of such services:

Causes of/reasons for the failure of services to fit with older people's priorities and needs

- Failure to meet personal and cultural beliefs, interests and priorities;
- Conflicts between the value base of old and young, professional and layperson;
- Perceptions that services and their providers are patronising or ageist.
- Lack of choice and flexibility as to what is on offer;

Inaccessible services

- Accessibility of services due to sensory and mobility impairments, for example reading small text, listening to recorded messages and accessing e-services restrict accessibility;
- Practical barriers such as lack of transport; fear of crime etc;
- Bureaucracy and access criteria;

- Poor quality of services or anticipated poor quality of services

Psychological issues

- Older people themselves often lack awareness of their own needs;
- Lack of trust some older people have of formal services;
- Older people's concerns about revealing weakness or being associated with negative stereotypes;
- The fear of being considered frail or elderly is a key barrier to engaging with the outside world

Irrespective of how the final agreed eligibility criteria are defined, the consumer expert group believes that there should be targets for take-up of the support package. The targets need to be set against figures for the numbers of people who are likely to be eligible for help so that progress can be monitored and assessed.

16. Involving Volunteers in delivering support to a wide range of vulnerable consumers

The Consumer Expert Group believes that volunteers will have a key role to play in delivering support to a wide range of vulnerable consumers both before, at and after switchover.

However, if the voluntary and community sector is to be in a position to provide this support, it must be supported financially.

The voluntary sector simply does not have the capacity to provide this support without adequate funding. The Consumer Expert Group therefore believe that the Government and digital UK cannot rely on the voluntary and community sector to provide this support unless funding can be found for this aspect of the project.

Government does fund voluntary sector agencies to do work for them and it is now the case that almost one third of the sector's work is funded by Government. However, even groups that do receive funding are not yet being funded specifically to do this particular work, and smaller community groups (in rural areas, most fall into this category) will generally not be in receipt of any government support.

We would recommend that Digital UK/DCMS draw up a budget to facilitate the involvement of volunteers as "trusted assistants" who can visit vulnerable consumers just before and after switchover to provide peer support with using the new technology. In rurally isolated areas, finding volunteers to travel long distances might be an issue and in urban areas, language or culture may be an issue. In such circumstances the voluntary sector could recruit local people i.e. Parish Councils/Rural Advisors or 'community champions'. The voluntary sector could help with contacting "hard to reach" but would need resource to do so. Much more work would need to be done on this model (e.g. working out a recruitment and training programme, setting up a register, including Criminal Record Bureau checks as part of the activities) but it does have potential.

One model would be for digital UK/DCMS to contract with a consortium of voluntary sector agencies who would act as a national focal point for volunteers whilst also providing training, funding and good practice for local voluntary sector organisations.

We are unconvinced however, that the voluntary sector across the board has the capacity to support volunteering projects which will provide for installation of set top boxes. However, there may be some charity run services (e.g. handy-person schemes which could provide a technically specialised and high standard service) which could provide some installation support in some areas. This may be more difficult in rural areas because of lower population.

17. Information support by the Voluntary Sector to a wide range of vulnerable consumers

The voluntary sector is already beginning to be a key source of information for consumers about digital switchover. Whilst Digital UK's generic information (including the helpline) will be useful for most consumers, there will be a need for targeted information in other formats (e.g. a version for people with learning disabilities) and languages.

As we get closer to switchover, the voluntary sector will increasingly be relied upon for information support. Government and Digital UK cannot expect that the voluntary sector will provide this support free of charge. If the Government wants the voluntary sector to provide information support in advance and after switch-over, they should provide funding to support information provision by the voluntary sector for vulnerable consumers. Without this support, the sector will be unable to provide the information support vulnerable people will need. Examples are of this specific support are the need for information on other languages for certain groups who don't speak English and specific information for blind and partially sighted people on how they can cope with digital TV.

Appendix

Supporting the most vulnerable consumers through digital switchover.

Ofcom Consumer Panel. Summary and recommendations

1. In July 2004, the Secretary of State for Culture, Media and Sport asked the Ofcom Consumer Panel to consider what measures might be necessary to protect the interests of “the most vulnerable” consumers during digital switchover.
2. The Consumer Panel starts from a position of support for the principle of digital switchover. It takes the view that there are potentially significant benefits to people at large in the UK from a switchover to digital television. But the full value of these benefits will only be realised if the route to switchover is managed in such a way as to minimise the risk of detriment to vulnerable people.
3. In preparing this report we have concentrated on two key principles. First, our belief that what people need is practical, on the ground help. Second, that conversion of a single television set to digital in a household ensures continued access to television. Our estimates of costs are therefore based on single-set conversion.
4. This report does not seek to replicate the comprehensive amount of research and investigation that has already been completed in this area. Instead it focuses on the very practical aspects of switchover – taking a step-by-step look at the process of digital television adoption, determining what the barriers are at each stage and for whom.
5. Our key finding from this analysis of the digital adoption process is that those who are likely to be most vulnerable are people who need help in effecting the practical changes that digital television adoption requires and who have no-one to whom they can turn for support. That is, that digital switchover presents the biggest challenges for those who are socially isolated – people who will have difficulty in finding out about switchover, in understanding what it means and hence who are unable to take effective steps to deal with it. People without an adequate network of support from friends, family, neighbours or carers will therefore be particularly vulnerable.
6. We recognise that this concept of social isolation does not map easily onto more traditional concepts of vulnerability – ones that can be captured by reference to the benefits system for example. It will be related to age, to various kinds of disability and to low English literacy. We believe that it will therefore require a new and innovative delivery structure to address it effectively.
7. We make the following recommendations:
 - a. SwitchCo¹³, the body charged with implementing the switchover, should develop a process – working closely with the voluntary sector and local government – to identify people in need of help through switchover and provide a scheme offering practical support. We estimate that a national scheme along these lines could cost in the region of £110m.
 - b. Financial assistance should be offered to people currently eligible for TV licence fee exemptions or concessions (people over 75 or registered blind) in order to meet the costs of one-off purchases of equipment and any necessary aerial upgrade work needed to make the transition to digital. We estimate that the costs of such assistance could lie between £134m and £270m.
 - c. The total cost of what we are recommending could therefore in broad terms lie between £250m and £400m.
 - d. Significant and rapid attention must be paid to the particular requirements of people with disabilities, especially those with vision or hearing impairments, in order to ensure that suitable equipment at reasonable cost will be readily available.

- e. The widest possible roll-out of DTT should take place in order to ensure that the largest number of households across the UK have a choice of digital television platforms and access to a low cost option for digital television.
- f. Manufacturers and retailers should be urged to make sure that all equipment on sale is clearly labelled with its digital capabilities in order to prevent people making expensive mistakes in their purchases between now and switchover.
- g. Manufacturers should continue to develop easy-to-use set-top boxes and remote controls for those people who do not want complicated functionality.
- h. But most urgently, we urge those leading the switchover process to implement at the earliest opportunity a public information campaign for digital switchover. This will be integral to ensuring that the widest possible number of people understand the "What?", the "How?" and the "How much?" of digital switchover.

References

- ¹ The full summary and recommendations of the Ofcom Consumer Panel Report can be found in appendix 1.
- ² See Appendix. Supporting the most vulnerable consumers through digital switchover. Ofcom Consumer Panel
- ³ Just Above the Breadline, Age Concern. 2006.
- ⁴ Income Related Benefits Estimates of Take-Up. Published January 2006
- ⁵ Public Accounts Committee. "Tackling pensioner poverty: encouraging take-up of entitlements". April 2003.
- ⁶ Published under the title "Digital TV equipment; vulnerable consumer requirements. A report by the Consumer Expert Group to Government and Digital UK, March 2006.
- ⁷ The consumer expert group would consider supporting the provision of iDTVs through this package, but given the higher costs of these it seems unlikely that this is a realistic option. However, our recommendations in this paper could equally be applied to a government scheme that offered people iDTVs.
- ⁸ Published under the title Digital TV equipment; vulnerable consumer requirements. A report by the Consumer Expert Group to Government and Digital UK, March 2006.
- ⁹ Digital TV equipment: vulnerable consumer requirements. A report by the Consumer Expert Group to Government and Digital UK, March 2006.
- ¹⁰ Under the new scheme the installers would have to obtain an NVQ or SVQ, undertake a satisfactory criminal records disclosure and have public liability insurance.
- ¹¹ A Sure Start to later life, January 2006. SEU in ODPM
- ¹² "Provisionally entitled - Why do older people refuse to access services? Practical suggestions for making services more accessible.
- ¹³ Now known as Digital UK



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