



"We used to believe that because we are blind, good things were not meant for us. But Vodacom came to us and said, 'whatever physical challenges you have, we are here, we are catering for all.' (Tebogo)"

Promoting digital inclusion of persons with disabilities

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Vodacom initiatives

Inclusive company culture

Since inception:1994 – disabled staff appointed in various business units
Promoting digital inclusion since 2004

Accessible technology

Accessible devices since 2004
Prior to smartphones: manually loaded screen reader software on devices
Accessible app

Affordability

Discounted and special deals
Special bundle deals

Training of staff

Call centre and store staff
Awareness raising with staff of business units

Specialized services

SMS Emergency Service for Deaf and hearing impaired consumers (free)



Vodacom initiatives

Dedicated call centre support/expert support

Dedicated Contact Centres – customers contact for free via voice, Vodacom app, SMS and e-mail

Marketing initiatives

Use various channels: video campaign on social media and on-line
Inform disabled organizations of special offers

Promote customer service

Disabled customers receive priority in store
Phone repairs receive priority
Start-up process
Inclusive design stores



Comments on the Draft Code

DEFINITIONS

- **Disabilities – “Persons with Disabilities” -UN Convention on the Rights of Persons with Disabilities**
 - *This means persons with disabilities include those who have long-term physical, mental, intellectual or sensory impairments which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others.*

BASIC STANDARDS FOR BROADCASTING SERVICE LICENCEES

- **Regulation 4(3) Subtitles**
 - The practical implications of the requirements needs to be considered i.e. ‘spoken word’ vs ‘contain easily read sentences’ – possible contradiction.
 - The requirement should be phased as an option i.e. an ‘or’ and not an ‘and’.
- **Regulations 4(4),(5) and (6) - Inform disabled organizations of special offers**
 - Practical implications may place an undue and costly burden on the provisioning of the services.



Comments on the Draft Code

STANDARDS FOR ELECTRONIC COMMUNICATIONS SERVICE

❑ Regulation 5(1) Universal design products and services

- Not practical to ensure that all devices cater for needs of persons with disabilities
- Vodacom cannot impose this requirement on international manufacturers – will increase cost of devices
- Vodacom can do more to educate persons with disabilities on devices available to them

❑ Regulation 5(2) Hearing aid compatibility requirements for fixed line handsets

- Not practical to impose on all devices
- Vodacom to educate persons with disabilities on devices available to them (features etc.)

❑ Regulation 6(1) – Free directory enquiries

- No economic basis for providing a directory service for free to persons with disabilities, while charging other subscribers a fee
- Loss in the provisioning of the service vs costs incurred.

❑ Regulation 6(2) – Emergency services

- Implemented by Vodacom

❑ Regulation 10 - Contraventions and penalties

- R5 million fine disproportionate to the impact or effect of non-compliance.



Going forward

**Continuously educate customers
on available services and devices
for persons with disabilities**

