Centre for Accessibility Australia

Cancellations for All:
Addressing Key Accessibility Issues Faced by Consumers When Cancelling Prepaid Mobile Services on Telecommunications Carrier Applications and Websites

Companion Report

September 2024

About Centre for Accessibility Australia

The Centre for Accessibility Australia (CFA Australia) is an award-winning disability-led not-for-profit organisation that works to promote digital access.

The digital world is an amazing resource that all of us increasingly rely on; however, the reality for people living with disability is that much of the internet remains inaccessible. CFA Australia coordinates a number of projects designed to reduce the accessibility gap and empower organisations to effectively implement accessibility.

1. We provide training for organisations and individuals looking to implement accessibility.
2. We provide website auditing services for organisations looking to access and improve their accessibility.
3. We develop free, highly accessible online resources for content creators and organisations to promote and respond to digital access.
4. We create free online resources for people with disabilities on how to use Assistive Technology. These resources will include how-to guides for Assistive Technologies (AT), product advice about AT, and a free helpdesk that provides information and assistance about AT for people with disabilities.
5. We advocate and promote the accessibility movement via our accessibility campaign. The purpose of the campaign is to empower and encourage digital content developers to implement accessibility when designing online resources.
6. We celebrate Accessibility success stories through the biannual Accessibility Awards.

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Executive Summary

The Cancellations for All project has been funded by ACCAN to explore the issues raised by people with disability to CFA Australia, relating to the cancellations of mobile phone plans. Although a comprehensive assessment was taken of 44 SIM providers in relation to user testing and conformance against the WCAG 2.2 standard, some key issues relating to accessibility fell out of scope in the main report. As such, this Companion Report outlines additional issues that are extremely important to accessibility for all. This includes items such as identification requirements, early activation, and postal address accuracy.

In line with this, CFA Australia recommends:

- The ACMA notify Carriage Service Providers (CSPs) of their obligation to review and comply with the Telecommunications Service Provider (Customer Identity Authentication) Determination 2022. This includes ensuring identity options align with those set out in the determination, with no undue restriction on suitable identification formats or verification options.

- The ACCC investigate whether 'starting the clock' on SIM cards consumers have not yet received is an unfair business practice for vulnerable consumers

- CSPs ensure form fields for postal addresses are flexible to allow them to include only a simple street name and number.

These recommendations will support the access and independence of people with disability when attaining a SIM from mobile service providers.

1. Introduction

1.1 Project overview

The 'Cancellations for All' project was launched to support people with disability, their families, and carers over accessibility issues in the telecommunications sector regarding the cancellation of mobile services. CFA Australia applied for funding from ACCAN through their grants program. This allowed CFA Australia to facilitate research and analysis on which accessibility issues were prevalent when cancelling a prepaid mobile service, along with the associated support options that were available and how these issues could be addressed.

This project began in September 2023 with the report being completed in April 2024, which is available as a free reference on the CFA Australia website.

During this process CFA Australia found issues that were out of scope to the project despite being integral to the rights of consumers with disability. As such, it was determined that a complimenting 'Companion Report' should be offered.

This report will cover the important processes prior to the commencement of the 'Cancellations for All' Main Report. We will be outlining the issues encountered when ordering and signing up for SIMs from various telecommunication providers.

Overall, there were three common issues identified which remain prevalent in the industry. Firstly, the varying ID requirements, secondly, the invoicing protocols from some providers, and lastly, the difficulty in providing the correct and exact delivery address.

This report covers these three issues and identifies space for improvements with regards to accessibility within the industry.

1.2 Why this project is important

This 'Cancellations for All' project investigates how to improve the accessibility of mobile phone plan cancellations for the around 4.4 million people in Australia with some form of permanent disability as reported by the Australian Institute of Health and Welfare (AIHW).

In relation to digital access, the Australian Bureau of Statistics (ABS) confirmed in 2018 that 1.1 million people with disability (28.5%) did not use the internet, which is largely due to individuals running into accessibility barriers. This compares with 12% of the public that do not participate online. In addition, Australian Communications and Media Authority (ACMA) data indicates that 95% of Australians used a mobile to access the internet, 97% for voice calls and 96% for texting as of 2023. This is especially important to this project as any digital access issues are likely to have a large impact on people with disability in a world that's increasingly reliant on the use of a mobile phone.

People with disability are willing to embrace the advantages independent access to online content provides if accessibility restrictions are removed, according to research on the disability gap conducted by Hollier (2006) and Conway (2014). Sir Tim Berners-Lee, inventor of the World Wide Web, described the importance of web accessibility, in these terms:

"The power of the Web is in its universality. Access by everyone regardless of disability is an essential aspect." In essence, Disability + Technology = Independence."

In a digital-first world where state and federal governments are transforming and digitising their interactions with the public, ensuring independence and access for people with disability to mobile communications is more important than ever. The original report unpacks the overall accessibility of providers purchase & cancellation processes in detail. The specific additional items unpacked in this companion report are 'easy wins' for the sector and consumers. This includes ensuring uniformly applied accessible identity requirements, fairness in billing and activation processes, and flexibility in address fields enough to ensure products are delivered.

Although legal compliance can be a motivator for making online services accessible, CFA Australia focuses more on advocating for the importance of digital access, and providing support and education to organisations so they can understand the benefits accessible content can provide.

Additional information on the ways in which people with disability engage with online content can be found at the resource How People with Disabilities Use the Web produced by the World Wide Web Consortium (W3C).

2. Consumer Issues Identified

2.1 Identification requirements

The [Telecommunications Service Provider (Customer Identity Authentication) Determination 2022](#) specifies that a carriage service provider is deemed to have verified a requesting individual as the customer only if the following conditions are met:

1. The requesting individual provides:

- The identifying numbers from at least two distinct government-issued documents.
- Information identifying the State or Territory that issued these documents or confirmation that the documents were issued by the Commonwealth.
- If required by the government online verification service, any dates or additional details recorded on the government documents.

2. The information given in relation to each of two government documents is verified on a government-accredited digital identity service.

The verification process involves matching the information provided against the databases of the issuing agency, with the information being either accepted or rejected based on whether it matches.

Additionally, ACMA provides [guidance on identity checks for prepaid mobile services](#).

Although there appears to be a very straightforward process set out for identification, the same was not reflected when CFA Australia was registering all 44 prepaid SIM cards. For example, mobile service providers such as JB HIFI, Bendigo Telco and Southern Phone allowed for other photographic ID to be used instead of a passport. However, certain providers such as Aussie Broadband, Konec, and Think Mobile remained strict with the passport requirement. There were also other providers that required almost no form of identification, such as Felix.

Several mobile service providers require a passport or driver's license as proof of identification when placing an order. If an individual does not possess a driver's license or passport, alternative methods for verifying their identity are not specified on the websites. This information is only provided upon contacting customer service. For example, some companies state that they only accept passport and/or driver's licence as a form of ID. However, when a call is made, often they would accept a Medicare card alongside additional proof of ID such as a utility bill.

Notably, a number of companies began the invoicing process on the day that the SIM card was sent out rather than the date of activation from the user. This was not clearly stated during the sign-up process and could lead to people paying money despite not using the service yet.

This problem correlates directly with the last common issue identified, which was that many providers' sign-up page did not allow users to input complex addresses such as a suite within a building. Often, this would lead to us being unable to receive the SIM card despite the order supposedly being delivered already.

For example, with AGL, after having difficulties with providing the delivery address, we were notified that the payment cycle had begun even before we had received the SIM card.

Many people with disability do not drive and as such do not have a driver's license. Hence people with disability may lack sufficient ID or what they do have may be unusable, particularly when the full available suite of identification is not itemised by CSPs and used for verification of customers. One of the most crucial elements of this is a need for consistency – so customers can use the same identification at any CSP.

2.2   Early Activation

A pressing issue encountered was that SIM cards would be charged even though they had not have arrived at the premises or been activated yet. This was the case for AGL, where the service had begun even prior to the SIM card being put into the device and activated.

In addition, there are clauses included by mobile service providers that may cause customers to face unnecessary charges. For example, Flip Mobile charges a $10 cost should a SIM card not be activated in 30 days, while More and Tangerine charges the same amount within 2 months upon postage of the SIM card. This can cause issues for people with complex addresses that may not receive their SIM card appropriately. More on complex addresses will be discussed in the next issue identified. iiNet goes beyond charging an amount and automatically activates a service anytime on or after the 28th day from completion of the sign-up process.

It is important to note that these clauses are not clearly articulated to customers prior to the purchase of a SIM card. Another aspect to this is that the timeline is based on the postal system.

This disadvantages people with disability in rural areas who may be being charged for a service despite them not yet receiving it.

2.3   Postal Address Confirmation

CFA Australia had issues using our own postal address which has a suite number alongside the street number and name.

It was found that most mobile service providers did not allow for such an address to be input for SIM card delivery. Often, this led to SIM cards not being delivered appropriately during the supposed timeframe to CFA Australia.

For mobile service providers such as Exetel, iiNet, iPrimus, Spintel, Superloop, and Swoop, a phone call had to made to ensure that the SIM card would be delivered to the correct address. This may cause difficulties to people with a disability who are unable to facilitate a phone call. In addition, this information is not presented anywhere on their website.

However, some providers do not even accept a phone call to confirm or update the delivery address to a more complex one. For example, a representative from Southern Phone encouraged us to change the physical SIM card to an E-SIM as their system was not set up to accept non-standard addresses. By ordering an E-SIM, only an email address would be required.

3. Recommendations and Conclusion

1. This report has highlighted three key issues that were not addressed in the primary report due to being out of scope. During the review of the project by ACCAN and CFA Australia, these issues were uncovered and identified as posing a significant risk to people with disability. Hence, through this companion report, CFA Australia recommends that the ACMA notify CSPs of their obligation to review and comply with the Telecommunications Service Provider (Customer Identity Authentication) Determination 2022. This includes ensuring identity options align with those set out in the determination, with no undue restriction on suitable identification formats or verification options.
2. The ACCC investigate whether 'starting the clock' on SIM cards consumers have not yet received is an unfair business practice for vulnerable consumers
3. CSPs ensure form fields for postal addresses are flexible to allow them to include only a simple street name and number.

The identification requirements, early activation, and postal address confirmation are of particular importance to people with disability as these features ensure people with disability can both cancel and commence plans efficiently. From this companion report, regulators and CSPs will have an understanding of the options available to avoid excluding customers with disability from telecommunications services, and ensure their full independence when obtaining a SIM from a mobile service provider.