



Hearing New Zealand

Te Kāhui Rongo o Aotearoa

Charity Number: CC51566

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Submission on the Future of Relay NZ

Thank you for the opportunity to submit on the future of Relay NZ.

As President of Hearing New Zealand, I have seen a significant change in the service provided by Relay NZ. Previously, the majority of users were people with hearing loss. Although the service benefited people in my community, it did not provide adequate access for people who use New Zealand Sign Language as their primary means of communication.

The numbers have now reversed, with the significant majority of calls being made by sign-language users. Providing appropriate access for sign-language users is essential and long overdue. However, this should not come at the expense of other people with communication needs.

Relay NZ should be capable of accommodating all people who cannot independently or effectively use a standard telephone. This includes people who are Deaf or hard of hearing, deafblind people, people with speech disabilities, people with aphasia, people with neurological conditions, people who use augmentative and alternative communication, and people who communicate through braille or other text-based technology.

Relay is not simply a telephone service. It is an accessibility service that allows people to participate in ordinary life. It enables people to make appointments, speak with government agencies, contact health professionals, manage banking and utilities, communicate with employers, maintain relationships and obtain help in an emergency. Without an accessible relay service, people can be excluded from essential services that most New Zealanders take for granted.

I was previously a member of the Relay NZ User Advisory Group. I resigned when I felt there was no meaningful opportunity to influence change and that the focus had become almost exclusively centred on sign-language services. Sign-language access is extremely important, but Relay NZ should not be designed around only one part of the disability community.

Accessing the service



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In preparation for this submission, I attempted to access the Relay NZ applications and services myself.

The Relay NZ app was incredibly slow to load. Every page took a significant amount of time to open. I tried the app on several different phones and Wi-Fi networks and experienced the same problem. At times, it took so long that I thought my phone had frozen.

An accessibility service should not itself create additional barriers. People who use Relay NZ may already experience difficulties with hearing, sight, speech, language, cognition, dexterity or technology. The service should therefore be simpler and easier to access than an ordinary communications platform, not more complicated.

The terms and conditions state that the service may only be used by “genuine persons” and narrowly define users as people who are Deaf, deafblind, or have hearing or speech communication difficulties and cannot effectively use a standard telephone or amplified headset.

This definition may exclude other people who could benefit from Relay NZ. For example, someone with aphasia following a stroke may hear the telephone but be unable to communicate their message clearly. A person with Parkinson’s disease, motor neurone disease, cerebral palsy or another neurological condition may have speech that is difficult for an unfamiliar listener to understand. Someone who uses an augmentative and alternative communication device may need additional time or text support to conduct a telephone call.

These people have genuine communication needs, even though they may not fit neatly within the existing categories.

The terms do not clearly explain how Relay NZ determines whether someone has a “genuine need”. This is concerning because access to an essential service should not depend on an undefined and subjective assessment.

The terms also state that a person must use the service “without interfering with the use of those services by anyone else”. I did not understand what this meant and could not find a definition.

One of the consultation questions was around Misuse. I sent an OIA in regard to MBIE for clarification of what they meant by the term misuse. This was a vague ambiguous



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term. There were three main causes of misuse. “not in the community, prank and other.

When I called Relay NZ to ask I clearly identified myself and explained why I was calling. I was told that people often do not want to accept calls from Relay NZ. When I asked further questions, I was told that the staff member could not answer because of privacy concerns.

There were long pauses without explanation. I eventually asked to speak with the person the staff member appeared to be consulting. I was transferred to a team leader, who was lovely and professional, but more adept at not answering the questions. I did not learn about any criteria used.

The terms and conditions also state that Relay NZ:

- may end a call if it determines that the call is not genuine, without clearly defining what “genuine” means;
- may modify, suspend or restrict the service without notifying users;
- may change eligibility requirements;
- may change service codes or telephone numbers;
- reserves the right to introduce charges for services currently provided free of charge;
- accepts no Crown liability for failures of the relay system;
- may determine, at its sole discretion, which requests are managed, handled or approved; and
- may cancel bookings that it considers inappropriate.

These are extremely broad powers for an essential accessibility service. Users need transparency, accountability and a clear complaints and review process. Decisions about whether a disabled person may access communication support should not rest solely with the service provider, particularly where there are no published criteria or accessible appeal mechanisms.

Privacy and application design



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After eventually getting through the terms and conditions, I went to the privacy policy. It took so long to load that I again thought my phone had frozen.

The privacy policy itself appeared relatively standard. My concern was not primarily its content, but how difficult it was to access.

The app appears poorly designed and insufficiently tested with the people who are expected to use it. Accessibility testing should include people with different disabilities, different levels of digital confidence and different types of devices.

Testing should include:

- Deaf and hard-of-hearing users;
- deafblind people;
- people who use screen readers;
- people who use refreshable braille displays;
- people with low vision;
- people with speech or language disabilities;
- people with limited dexterity;
- people with cognitive or learning disabilities;
- older people; and
- people who have limited access to modern devices or reliable internet connections.

Accessibility cannot be assessed only by whether an application technically opens. It must be practical, understandable, responsive and usable in real-life situations.

Braille and deafblind access

Relay NZ needs to specifically address access for people who are deafblind or who use braille as their primary method of receiving written information.

A person using a refreshable braille display should be able to connect to Relay NZ through an accessible text interface. The service should work with commonly used



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screen readers and braille technologies and should not depend on visual icons, video, audio alerts or rapidly disappearing messages.

Text should be presented in a clear and predictable format. Buttons and controls should be properly labelled. Users should be able to navigate using a keyboard, screen reader or braille display without requiring sighted assistance.

People who are deafblind may require more time to read, interpret and respond to information. The relay system must allow for this without timing out, disconnecting or treating pauses as inactivity. Relay assistants should also receive training in deafblind communication and in working with people who use braille, text-based communication or tactile signing.

Braille access should not be treated as an optional addition. For someone who cannot hear a telephone call and cannot see a screen, an accessible text and braille connection may be the only independent way to communicate remotely.

Relay NZ should consult directly with deafblind people and organisations representing them. Accessibility should be designed with users, not merely for them.

Emergency calling

A major concern is that 111 calls cannot be made directly through the full range of Relay NZ services. This must be addressed as a priority.

Emergency access should be an integral part of any publicly funded relay service. A person should not be placed at greater risk because they cannot hear, speak or use a standard telephone.

At present, access to emergency services through text or TTY may require a person to be registered in advance. This assumes that the person knows about the service, has completed the registration process and has access to the appropriate technology when an emergency occurs.

A person may acquire a communication disability suddenly through an accident, stroke or illness. A visitor to New Zealand may not be registered. A person may be using someone else's phone or device. An emergency system must take these realities into account.



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There are reportedly fewer than 100 remaining TTY users in New Zealand. Continuing to rely on legacy TTY equipment as a principal route to emergency access is neither practical nor adequate for the wider disability community.

Relay users should be able to contact 111 through a simple, clearly marked and prioritised pathway. Emergency calls should receive immediate priority and should not depend on making a booking or waiting in a general queue.

There also needs to be clear information about what happens if the app, internet connection or relay centre fails during an emergency.

Microsoft Teams and video relay

Relay NZ uses MS Teams to provide services. This was transitioned last year from Skype. I realise that they were only given two months to change over to the new service but there still seems to be teething problems a year later.

I had forgotten how difficult it can be to register for Teams. I have it through my organisation but wanted a personal account.

The Process:

To access video calling, Microsoft Teams required me to establish an account. After considerable searching, I discovered that there is a free version.

First, I had to establish a Microsoft account:

1. Go to Microsoft's account page and select "Create an account".
2. Enter an existing email address or choose "Get a new email address" to create an Outlook address.
3. Create a strong password.
4. Enter a first and last name.
5. Select New Zealand as the country or region and enter a date of birth.
6. Complete the security check.
7. Receive a verification code by email and enter it to confirm the account.

Creating a new email address was itself quite a process.



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I then had to create and set up a free Teams account:

1. Go to the Microsoft Teams sign-in page and select “Sign up for free”.
2. Enter an email address or mobile number.
3. Choose how the account will be used.
4. Sign in with an existing Microsoft account or create one.
5. Complete further verification.
6. Download the Teams application or use a web browser.
7. Give Teams permission to access the camera and microphone.

After approximately an hour and a half, I was finally able to access the service. It is not for the faint-hearted.

This process assumes that a Relay NZ user has:

- an email address;
- a compatible device;
- reliable internet access;
- sufficient digital literacy;
- the ability to complete security checks;
- the ability to receive and enter verification codes;
- the confidence to grant camera and microphone permissions; and
- the ability to troubleshoot when something goes wrong.

Many of the people most in need of Relay NZ may find these steps extremely difficult. Some may abandon the process entirely.

A government-funded accessibility service should not require users to establish an account with an international technology company before they can communicate. Relay NZ should provide a straightforward connection method that does not require multiple registrations, accounts, passwords and verification steps.



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At a minimum, Relay NZ should provide clear step-by-step instructions in accessible formats, including NZSL video, Easy Read, large print, audio, screen-reader-friendly text and braille-ready electronic files. It should also provide telephone, video or in-person assistance to help people set up the service.

Service quality and public information

Relay NZ's Facebook page contains very little useful information or meaningful engagement. The limited public comments I observed included users complaining about slow technological response times and the standard of written English used by relay staff.

A relay assistant is communicating on behalf of another person. Accuracy, clarity and professionalism are therefore essential. Poor grammar or unclear wording can alter the meaning, tone or credibility of the user's message.

Relay assistants need strong language skills and appropriate training. Users should also be able to request correction where a message has been misunderstood or inaccurately relayed.

Relay NZ should publish regular information on:

- service availability;
- average waiting times;
- abandoned calls;
- technical failures;
- complaints;
- user satisfaction;
- call volumes by service type;
- emergency access;
- accessibility improvements; and
- progress against agreed performance standards.

Publicly funded services need public accountability.



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Why Relay NZ remains important

Relay NZ remains an essential service, even as communication technology changes.

Mainstream tools such as email, text messaging, video calling and social media have made communication easier for many people. However, they have not removed the need for relay services.

Many essential organisations still rely heavily on telephone communication. Medical practices, government agencies, banks, utility companies, insurers, employers and emergency services may require a person to speak by telephone to verify information or resolve an issue.

Family members and friends may also prefer or need to communicate by telephone. A disabled person should not always have to rely on a spouse, child, support worker or friend to make calls on their behalf. That undermines independence, confidentiality and dignity.

Relay NZ allows people to communicate directly and make their own decisions. It supports privacy when discussing health, finances, employment, relationships or legal matters. It also supports participation in education, work and community life.

The service therefore has a broader purpose than simply transmitting words. It enables citizenship, independence, safety and social inclusion.

Recommendations

I recommend that the future Relay NZ service:

1. Retain and strengthen access for NZSL users while ensuring that other communication disabilities receive equal consideration.
2. Broaden its eligibility criteria to include anyone who cannot independently and effectively use a standard telephone because of a hearing, speech, language, vision, neurological, cognitive or physical disability.
3. Clearly define “genuine need”, “genuine call”, “interference” and “inappropriate use”.
4. Establish a transparent process for reviewing decisions to suspend, restrict or refuse access.



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5. Provide a simple and accessible complaints and appeals process independent of the contracted service provider.
6. Make direct and reliable access to 111 an urgent priority across text, video, captioned, speech-to-speech and braille-compatible services.
7. Develop an accessible text platform that works fully with screen readers and refreshable braille displays.
8. Ensure that the service allows sufficient time for deafblind people and others who communicate more slowly, without disconnection or time-out penalties.
9. Provide alternatives to Microsoft Teams that do not require users to establish multiple external accounts.
10. Redesign and thoroughly test the Relay NZ app with people from across the disability community.
11. Provide information and setup support in NZSL, Easy Read, large print, audio, screen-reader-compatible and braille-ready formats.
12. Improve the training, written English, communication skills and disability awareness of relay assistants.
13. Publish meaningful service-performance and user-satisfaction information.
14. Re-establish a genuinely representative user advisory group with a clear pathway for its recommendations to influence service design and government decisions.
15. Undertake direct consultation with people with hearing loss, Deaf people, deafblind people, braille users, people with speech and language disabilities, augmentative communication users, older people and those with limited digital access.

Conclusion

Relay NZ is an essential accessibility service for people with communication disabilities. It should not be built around a single disability group, a single communication method or a single technology platform.

The future service must recognise the diversity of people who may need assistance to make and receive calls. It must be simple, reliable, inclusive and accountable.



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Calling 111 must be an integral part of the service. Access for deafblind people and braille users must be deliberately built into the system. People with speech, language and neurological disabilities must also be recognised as legitimate users.

Most importantly, the service must be designed around the needs and experiences of the people who use it. Access should not require an hour and a half of setting up accounts, waiting for applications to load or trying to understand vague terms and conditions.

Relay NZ should remove communication barriers. It should not create new ones.

Regards,

Lisa

Dr. Lisa Seerup
President
Hearing NZ