

20th July 2026

Blind Low Vision NZ Submission NZ Relay Service Contract Tender Process

Introduction/ Overviews

Blind Low Vision NZ would like to thank Hon Paul Goldsmith and MBIE for extending the consultation period to allow a better understanding of the needs of the deafblind community. Services such as the NZ Relay Service are necessary for everyday living and not an option of a nice to have.

Ability to communicate and connect with others is not merely about the ability to converse but also the important social and wellbeing need all humans have to be part of a family, have friends and be part of a community.

About Blind Low Vision NZ

Blind Low Vision NZ is the operating name of the Royal New Zealand Foundation of the Blind. Our organisation was founded in 1890 and has been serving New Zealanders who are blind, deafblind or low vision for over 135 years. We are motivated as a 'for purpose' organisation guided by our [mission, values, and strategic plan](#).

Blind Low Vision NZ exists to empower our approximately 16,000 clients who are blind, deafblind, or low vision to live the life they choose. We estimate that 193,000 New Zealanders live with vision loss^{i, ii}, and expect that number to grow to 225,000 by 2028ⁱⁱⁱ. Some common eye conditions include Age-related Macular Degeneration, Diabetic Retinopathy, Glaucoma, Cataracts, and inherited retinal diseases.

Blind Low Vision NZ is New Zealand's leading provider of vision rehabilitation services. These services ensure that people who are blind, deafblind, or low vision have the support they need to thrive.

About the People we Serve

In 2025, BLVNZ commissioned **Shining a Light on Blindness**,^{iv} a piece of Integrated Data Infrastructure (IDI) research to identify and describe some of the challenges faced



by people with visual impairment in their everyday lives. The indicators chosen to assess outcomes for people cover a broad scope and identify areas where people with visual impairment could be disadvantaged compared to those with no visual impairment.^v

People with severe visual impairment is the term chosen to define those identified in the IDI data as receiving support and services related to their vision or have a hospital diagnosis of blindness or severe visual impairment. People with other visual impairment includes those who have self-reported seeing difficulties.

Almost 2.2% of the population has some kind of visual impairment and people with severe visual impairment were 10 times more likely to have hearing difficulties than those with no visual impairment. For people with other visual impairment the difference in rate was 17 times.

The disability rate for visual impairment increases for older people and can lead to shortened lives

People with blindness and visual impairment live in areas of the highest socio-economic deprivation and face multiple challenges with inequity in housing

People with blindness and visual impairment face disadvantage through finding employment, low income, and benefit dependence

As well as a higher rate of disadvantage in education there is also a higher rate of disadvantage in areas of employment, income, and benefit dependence.

The individual calendar year gross income for 86% of people with severe visual impairment is \$60,000 or under, compared to 59% of those with other visual impairments, and 49% of those with no visual impairments.

Our Recommendation

The NZ Relay Service is a vital communication system for our clients who are deafblind. For those who are deafblind other options to communicate through texting or video calls are not accessibility as they are for those those with who are deaf or blind. Our research report, *Shining a Light on Blindness*, found that some deafblind clients became more aware of their hearing loss as their vision deteriorated. They had previously been using visual cues—such as facial expressions and lip movements—to support their hearing and communication, without necessarily realising how much they relied on them.

No reduction of service should occur. The deafblind community has no other options if any of the options are removed from the contract to deliver NZ Relay Services. As the



population ages, in years to come a similar review should take place to ensure people still require the same services. The United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) requires all signatories to ensure as per Article 3 c) Full and effective participation and inclusion in society. The barriers for deafblind are already high, the ability to communicate with family, friends, organisations including retail, government, service providers and for purposes of work is paramount for everyday living.

Even when there is only one person in Aotearoa New Zealand who requires one of the NZ Relay Services, the services must remain. NZ Relay Services should never be considered through an economic lens, but through the needs of a persons who relies on the service.

Analysis

The NZ user communities that should benefit from a fit for purpose. Telecommunications Relay Service have the following approximate sizes:

- Deaf 4,000
- Deafblind: 650
- Speech impaired 20,000
- Hard of hearing needing captioning 180,000

BLVNZ is concerned that MBIE has stated the NZ Relay app (Captioned and Text Relay, combined with web Text Relay) are the most used services when in fact there is insignificant use of the unfit for purpose captioned relay service. The NZ Relay app does not have the specific attributes required by Deafblind people. Text Relay is one of the most used services for those who are deafblind as it works for people with dual sensory loss.

As discussed above, the number of clients who are deafblind are typically elderly which challenges accessing the digital world, not having broadband or a device. Nor having the financial capacity to keep up to date with technology. They can also be socially isolated relying heavily on carers, family or others to support them with accessing the everyday essentials. Hence, they do not have access to web pages or Facebook, making requests for information about the NZ Relay Service challenging when opinions are required. They also need to be convinced that the services offered by NZ Relay are fit for purpose for their members.

Blind Low Vision wishes to see that Article 9 of UNCRPD upheld. Aotearoa New Zealand must ensure “on an equal basis with others...communication including information and communication technology”. For someone who is deafblind other digital solutions such as sign language interpreters, or word captioning only meet one of their sensory losses.

Dr Sally Britnell, et al, report, “Deaf blindness in Aotearoa, New Zealand: Prevalence and Equity Challenges from a Cross-Sectional Census Analysis (Deaf blindness Report) reflects additional data and insights into those living with dual sensory loss. The report reflects Blind Low Vision “Shining a Light on Blindness” report that geographical and social deprivation is high for those who are deafblind. Due to an aging population the need and demand for services and supports for those who are deafblind will only increase. “In Aotearoa, New Zealand, a lack of reliable, equity focused prevalence data limits planning for accessible services for deafblind people and contributes to unmet need, particularly for communities already experiencing health inequities”. (Deaf blindness Report)

Deaf blindness further limit's function compared with difficulty seeing or hearing alone, increasing the risk of depression, cognitive decline, mobility issues, and social isolation. Hand-over-hand (tactile signing), block alphabets, and visual framing (box signing) interpreters are difficult to find in Aotearoa New Zealand, so the need for NZ Relay Services for communication is critical.

Feedback

Blind Low Vision staff attended one of the consultation sessions held to provide some feedback directly to ‘All is for All’ and to the MBIE staffer present.

For the question around which parts can be phased out, Blind Low Vision concludes that while there is one deafblind person requiring and using that relay service it must remain. Until technology is created to support the communication needs of those who are deafblind in a similar capacity to Caption Relay, text relay or web text relay.

Blind Low Vision recognises the harm and damage misuse of services have on those who provide the services. Harassment cannot be taken lightly, but the misuse of some should not be used to punish those who rely on the service. Adding additional challenges to use a NZ Relay Service should be kept to a minimum. The lowest threshold and barrier could be introduced such as a one time sign in for registration of a user. This registration needs to be simply for delivery. Additional funding should be provided from MBIE via the Government to support NGOs and community groups to be able to support users of the NZ Relay Service to register. Complexity of registering all user's devices is too complex and rather vpn or other technology solution should be sort.



When Blind Low Vision staff directly asked MBIE what policy options and levers that were being considered to stop the misuse of the service, advice provided was that the government is considering all options. Blind Low Vision seeks support directly from the government to fund any awareness, strategies, or strengthening of legislation to effectively deal with misuse and harassment of NZ Relay staff. Indirectly asking those who are users of the services unfairly places the burden of solution focused outcomes on the wrong group.

Conclusion

Future services must:

1. Support Deafblind users with Braille compatibility, font selection, size, foreground and background colours for low vision users and adjustable reading speed for Braille.
2. Support two-way calling for all services with the assignment of a national (preferably non-geographic) telephone number to each end-user.
3. Emergency calls via the NZ Relay service, be they through a centre with NZSL interpreters or via an AI-based service supporting speech-to-text and text-to-speech all be directed in a prioritised manner to the relay centre or the 111 Initial Call Answering Point so that NZ Police can dispense with the obsolete TTY and facsimile methods as well as the non-prioritised TXT111 service. This will give communications of deafblind people equivalent access to emergency services that hearing-oral people have. Recording the audio, video and RTT content of an emergency call should be possible with one icon click because such recordings have previously been requested by NZ Police.
4. Deliver high system availability that the wider public enjoys with telco-grade services. This typically requires core system duplication to overcome natural disasters and events such as the Auckland Convention Centre fire that resulted in the CSD relay centre having to close for several days, a fibre cut at Counties Power that isolated the system from users, and other incidents.
5. Be affordable to low-income users in terms of broadband and devices. The core of the former MED Textphone Pool Business Case written in 2003 remains valid today, i.e. affordability. See Attachment 4. Note that demand was lower than forecast because the then provider introduced Internet Relay from service commencement and funds were repurposed to establish the VRS and later VIS.



ⁱ Thornley SJ, Gordon K, Shelton C, Marshall R. The prevalence of visual impairment: a capture-recapture study in three urban regions of New Zealand. Available at: <https://blindlowvision.org.nz/news/new-study-vision-rehabilitation-new-zealand/>

ⁱⁱ Original numbers were obtained from: New Zealand Disability Survey 2013. Available at: <https://www.stats.govt.nz/information-releases/disability-survey-2013> .

ⁱⁱⁱ Moore, David; Rippon, Rebecca; and Niemi, Malin. *Vision Rehabilitation in New Zealand*. 27 February 2019. Sapere Research Group. Page 14, Section 4.4.

^{iv} Blind Low Vision NZ, Shining a Light on Blindness: An Analysis of outcomes for Working Age New Zealanders who are Blind or Visually Impaired. Released 27 February 2026. <https://blindlowvision.org.nz/shining-a-light-on-blindness/>

^v Administrative data in the Stats NZ Integrated Data Infrastructure (IDI) can be used to identify people who are blind or have visual impairment and compare their outcomes to people without visual impairment. Caution needs to be applied when assessing absolute numbers of people as the administrative data will not be able to identify everyone with visual impairment. Some groups of people are less likely to be identified in the data as they are less likely to seek support, use services or complete the Census.

Britnell S, Garrett N, Bretherton C. Deafblindness in Aotearoa, New Zealand: Prevalence and Equity Challenges From a Cross-Sectional Census Analysis. *Asia Pacific Journal of Public Health*. 2026;0(0). doi:[10.1177/10105395261456806](https://doi.org/10.1177/10105395261456806)

