



Position Paper

ANEC comments on NEN/SN feasibility study on smart house services for elderly and disabled persons

ANEC-SERV-2009-G-043

1. Introduction

In 2007-08 NEN and SN carried out a feasibility study on smart house services for the elderly and disabled people within the framework of Second Programming Mandate M/371 addressed to CEN by the European Commission. Following this work which finished in September 2008, the final report “Smart House Services for Elderly and Disabled People”¹ was published in May 2009.

ANEC recognises the increasing role technology plays in private homes and, in particular, the positive impact smart house technology may have on the quality of life of older persons and persons with disabilities. It is particularly important to ensure that the various components of smart house services, often offered by separate providers, are interoperable and function together seamlessly².

ANEC acknowledges that European Standards which set ambitious quality requirements for services bring benefits to consumers, however, in our view voluntary standards are not sufficient *on their own* to ensure the safety or quality of services. ANEC therefore calls for a European horizontal legislative framework on the safety, quality and liability of services, to be underpinned by standards. The following comments should be read in this broader regulatory context.

2. Scope and definitions

The NEN/SN report acknowledges that various different terms and definitions are in use in the field of smart house technology and related services, such as ‘remote houses’ or ‘domotics houses’. The report also notes that use of smart house services is still quite new in many countries and while the report sheds light on certain issues, some aspects remain vague and more research into the area would be necessary. The report underlines that a more thorough investigation of the many documents in the field of smart houses that have emerged in recent years is necessary to ensure new standardisation initiatives do not overlap with existing work.

¹ <http://www.cen.eu/cenorm/sectors/business+development/value/project11smarthouseservices.pdf>

² Between 2004 and 2005 a Code of Practice (CoP) for Smart Houses was developed by CENELEC under their TC205 WG16 as a CENELEC Workshop Agreement. A key chapter of the document specifically addressed the consumer requirements. This was contributed to by ANEC and was positioned as part of the introduction to the CoP as an emphasis to system designers of the targets they need to address. This chapter was also written in such a way that it could be used as a stand-alone document to give an overview of consumer smart house requirements to a wider audience (ANEC-ICT-2007-G-094).

ANEC comments

ANEC fully supports the above findings and considering that the field of smart house services is not yet a mature one, stresses the need for more research in the field. Although the report defines services as *'a result of one activity, necessarily performed at the interface between the supplier and customer, which is generally intangible'*³, it remains unclear what such services are in the particular context of smart houses, and what the individual elements of such services are. While a preliminary classification into safety monitoring, social alarming (telecare), and medical monitoring (telemedicine) is made at the beginning of the report, this division is regrettably not followed later on.

Considering the wide array of terms and the ambiguity surrounding their precise meanings, ANEC supports the report's recommendation for a terminology/classification standard on smart house services, as a necessary first step. Such a standard should not only help harmonise and clarify the diverse terms used in this field, but also help identify and classify the types of services and service elements which are relevant for smart house services. This classification should also take into consideration the roles of the different service providers in ensuring seamless and effective service delivery.

The terminology/classification exercise should also take into account the existing standards, codes of conduct and regulations, whether at the European, international or national level. In particular any outcomes and terminology developed as a result of the AFNOR feasibility studies on home services⁴ and residential home services⁵, and in CEN/TC 385 Project Committee 'Sheltered Housing Services', should be examined.

3. Needs and recommendations for European Standards

The report (Part II) sets out an Action Plan describing the topics for further action and standardisation work. The Plan notes that "no strong support" was given to initiate any of the proposed standards work as CEN Workshop Agreements (CWAs) but, rather, as European Standards or perhaps a guideline on best practices.

The Action Plan proposes the establishment of a new CEN Project Committee which would carry out the following work:

- European Standard on Terminology and Classification

³ From ISO/IEC Guide 76:2008 Development of service standards - Recommendations for addressing consumer issues

⁴ <http://www.cen.eu/cenorm/sectors/business+development/value/project4homeservices.pdf>

⁵ <http://www.cen.eu/cenorm/sectors/business+development/value/project5residentialhomes.pdf>

- European Standard / set of Standards on Quality criteria for Smart House Services (incl. reliability, qualifications, supply chain aspects including service agreements and organizational context, privacy, safety, and service/technology interface and fitness for purpose).

The Action Plan acknowledges that before beginning work on a terminology Standard, the scope of the work must be developed further.

ANEC comments

ANEC supports the study finding regarding the two deliverables foreseen, but does not see the added value in developing a general guideline on best practices. Should standardisation work proceed once terminology / classification work has finished, ANEC would support the development of a formal European Standard on the core elements (as mentioned in the Action Plan). We believe this approach should nonetheless include examples of best practice which could then be more frequently updated according to technological progress.

As noted in the report, it is of utmost importance that other ongoing projects in this field are thoroughly examined before work on a possible terminology/classification standard commences and that a clear definition of 'smart house services' is developed at the onset of the work.

If further standardisation work were to follow once the above-mentioned terminology and classification work has been finalised, and should the conclusions support further work, ANEC would like to stress that any such standards should set ambitious requirements for the quality of the service, keeping accessibility as the common requirement in all the service elements to be addressed (incl. safety, training and qualifications of personnel, service delivery/reliability, complaints and redress systems, equipment/premises, service-technology interface, information provision and service agreements, after-sales services, sustainability and social responsibility, confidentiality and privacy issues).

Further to the above, ANEC stresses the importance of ensuring that the service solutions take into account the actual needs and preferences of each individual user.

Another relevant element to take into account, according to ANEC, is the difference between 'new build' smart homes and 'conversions' smart homes which could have an impact on the quality of the service provided and/or performance of the smart environment for consumers, not to mention the subsequent degree of accessibility. In case of refurbishment of existing buildings, which is expected to cover the majority of the smart houses in Europe given the level of urbanisation, the provision of accessible services might be seriously limited by external conditions.

In ANEC's view one of the main consumer concerns raised by smart environments, especially where medical care is being monitored, is the issue of private data protection. Very often the need to monitor a person's wellbeing requires a degree of invasion of privacy (e.g. monitoring their power or water consumption, movements etc). One way to tackle this in standardisation would be to 'unbundle' the incoming services, thereby allowing the resident to choose which activities or consumption may be monitored and which not. Despite it not being mentioned as a separate priority in the report, ANEC believes that standardised guidelines on privacy aspects for service provision in smart houses could usefully complement the body of European legislation on the subject⁶.

Related to this is the issue of resident identity. In order to further facilitate their life, elderly or disabled persons residing in a smart house may want to share their access codes/identity with a third person who could manage certain aspects (e.g. heating) from afar. Any standardisation work should take this possibility into account and consider this alongside issues of data privacy.

Finally, ANEC believes that as Smart Houses represent an entirely new way of using the electrical appliances in a house through which the service provision takes place, which the consumers are unaccustomed to and unfamiliar with, standards might ensure ease of installation and operation as well as provision of information on the services. This is particularly important for elderly consumers who are the group who might gain the most benefit from such services but who might be the ones who cannot operate them, especially when the service provision requires a certain degree of interactivity from the consumer side.

4. Ensuring stakeholder participation

Section 6 of the report draws attention to the importance of ensuring the participation of all stakeholder categories in any standards work, and notes that the project identified perceived difficulties in ensuring consumer participation in standardisation.

ANEC comments

ANEC fully supports the finding and stresses the need for CEN to put in place an effective strategy to ensure the balanced involvement of all relevant stakeholder groups

⁶ Directive 95/46/EC of the European Parliament and of the Council of 24 October 1995 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and Directive 2002/58/EC of the European Parliament and of the Council of 12 July 2002 on privacy and electronic communications



ANEC comments on smart house services

in the development of any standards in this field, and in particular to ensure the involvement of organisations representing disabled or older persons.

Note: specific (editorial) comments on the facts presented in the report are submitted separately to NEN/SN

Acknowledgements

This position paper has been prepared in consultation with the ANEC membership.

ANEC wishes to thank those who have actively contributed to the drafting of this position paper and in particular Kristina Unverricht for the preliminary analysis of the report.

APPENDIX – About ANEC

About ANEC

ANEC is the European Consumer voice in standardisation, representing and defending consumer interests in standardisation and certification, and in policy and legislation related to standardisation. Our aim is a high level of consumer protection. ANEC was set up in 1995 as an international non-profit association under Belgian law. It represents consumer organisations from the European Union Member States and the European Free Trade Association (EFTA) countries. Our General Assembly is composed of one national member per country, nominated jointly by the national consumer organisations in their country.

Contact person at the ANEC Secretariat

Nina Klemola

More information about ANEC and its activities is available at www.anec.eu

Should you have any problems in accessing the documentation, please contact the ANEC Secretariat.

☎ +32/2-743 24 70

📠 +32/2-706 54 30

✉ anec@anec.eu

📍 Avenue de Tervueren 32, box 27 – BE-1040 Brussels, Belgium

This document is available in English upon request from the ANEC Secretariat or from the ANEC website at www.anec.eu

© ANEC 2009

This document may be quoted and reproduced, provided the source is given

