



Communications Consumer Panel and ACOD response to the Citizens Advice Scotland (CAS) Policy and Campaigning Work Plan

The Communications Consumer Panel (the Panel) and the Advisory Committee for Older and Disabled People (ACOD) welcome the opportunity to respond to the Citizens Advice Scotland (CAS) Policy and Campaigning Work Plan 2017-18.

The Panel works to protect and promote people's interests in the communications sector, including the postal sector. We are an independent statutory body set up under the Communications Act 2003. The Panel carries out research, provides advice and encourages Ofcom, governments, the EU, industry and others to look at issues through the eyes of consumers, citizens and micro businesses.

The Panel pays attention to the needs of older people and people with disabilities, the needs of people in rural areas and people on low incomes, and the needs of micro businesses, which have many of the same problems as individual consumers.

Four members of the Panel also represent the interests of consumers in England, Northern Ireland, Scotland and Wales respectively. They liaise with the key stakeholders in the Nations to understand the perspectives of consumers in all parts of the UK and input these perspectives to the Panel's consideration of issues. Following the alignment of ACOD with the Panel, the Panel is more alert than ever to the interests of older and disabled consumers and citizens.

Response

Our response relates to the areas featured within the Citizens Advice Scotland (CAS) work plan that are also within our remit: rural consumers, mobile phones, nuisance calls and scams (Scams Awareness Month). We support the focus that CAS plans to give these important issues in 2017/18 and we look forward to continuing to work with CAS in ensuring consumers and citizens are protected from harm. We also support CAS' aim to promote complaints resolution procedures and redress, as part of National Consumer Week.

Rural consumers

We welcome CAS' attention to the needs of rural consumers and have also responded to the Consumer Futures Unit's consultation on its workplan, which features future publication of research into rural postal surcharging.

We look forward to an imminent UK Government announcement on a broadband Universal Service Obligation and have fed into Ofcom and UK Government consultations to encourage the use of all relevant technology to ensure that all households and businesses in the UK can access decent broadband speeds. Lack of access to the internet is no longer just an inconvenience, but a source of significant detriment as the internet is now seen as

an essential service. Take-up of broadband is also important - especially in rural and remote rural areas where it may be necessary to aggregate demand to reduce installation costs. Where citizens and consumers have not previously had access to robust and reliable internet (for example, in rural areas) basic digital skills and online confidence may be low, and this - as well as affordability - may prove to be a barrier to take-up. We have encouraged the UK Government to incorporate a social tariff into the USO. Consumer-facing representative organisations should collaborate with Governments, local councils and communications and training providers to improve basic digital skills and digital participation.

We will be keen to learn more about the proposed Network of Rural Assemblies (NoRA) and to continue to work with CAS on issues affecting consumers and citizens in rural areas.

Mobile phones

We welcomed CAS' research on the poverty premium, 'Paying More to be Poor' and support its continued focus on improving the experiences of people on lower incomes by providing practical policy solutions.

We believe mobile phone users and potential mobile phone users should be able to access and navigate the market, including switching provider where that is the best way for them to save money. Our research 'Inclusive Communications - We're not all the same'¹ gave insights into older and disabled people's experiences of communications services, including participants' differing views on the importance of having access to a mobile phone. Following publication of the research, we have met with communications providers (CPs) and asked them about the tariffs they operate, their customer service and debt collection policies and their approaches to vulnerable consumers who are unable to pay their phone bill.

We have been encouraged to see more focus on debt management policies in Ofcom's recent consultation on improvements to its consumer protection measures² and have responded in support of these. Ofcom has also recently published its Pricing Trends report³, which includes a section on mobile phone pricing trends. This report highlights one of the current concerns for the Panel, which is bundling handsets into post-pay plans. This can mean that the consumer continues to pay the same monthly amount even after they have paid for their handset. We do not believe this is fair. A better solution of that offered by some providers who offer tariffs which allow consumers to pay for their handset and airtime separately.

¹ <http://www.communicationsconsumerpanel.org.uk/downloads/inclusive-communications-research---final.pdf>

² https://www.ofcom.org.uk/consultations-and-statements/category-1/review-general-conditions-relating-to-consumer-protection?utm_source=LinkedIn&utm_medium=LinkedIn&utm_content=general%20conditions

³ https://www.ofcom.org.uk/__data/assets/pdf_file/0028/98605/Pricing-report-2017.pdf

Nuisance calls and Scams Awareness Month

We support CAS' work on nuisance calls and scams awareness and its participation in the Nuisance Calls Commission in Scotland, of which the Panel/ACOD is also a member. We welcome CAS' focus on this important area, with nuisance calls continuing to prove a source of real harm and detriment to consumers - and disproportionately affecting consumers in Scotland. We have long called for communications providers to provide calling line identification (CLI) as a free service to all their customers and we support this being a mandatory requirement; we also welcome recent advances in call blocking and 'blacklisting' technology at a network level.

The Panel is a member of the Age Action Alliance⁴, which has also been actively promoting scam awareness across its network of over 800 member organisations representing older people.

We would encourage the Scottish Government and consumer organisations in Scotland to consider how criminals might engineer scams and nuisance calls based on policy initiatives and take steps to pre-empt them - as happened in the Digital Switchover Help Scheme⁵.

⁴ <http://ageactionalliance.org/about-us/members/>

⁵ http://downloads.bbc.co.uk/aboutthebbc/insidethebbc/howwework/partnerships/helpscheme/SHS_paper_6_data_management_and_information_security.pdf