

15 March 2013

Dear Keith

Thank you for inviting the Communications Consumer Panel and the Advisory Committee on Older and Disabled People to comment on the proposed Citizens Advice Scotland work plan for 2013-14.

The Communications Consumer Panel is an independent panel of eight experts who work to protect and promote people's interests in the communications sector. We were established by the Communications Act 2003. The Panel carries out research, provides advice and encourages Ofcom, Government, the EU, industry and others to look at issues through the eyes of consumers, citizens and small businesses.

The Panel pays particular 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 small businesses, which face many of the same problems as individual consumers. There are four members of the Panel who 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. As you know, our Member for Scotland is Mairi Macleod.

There is also cross-membership with Ofcom's Advisory Committee on Older and Disabled People (ACOD). This means that Members, in their ACOD capacity, also provide advice to Ofcom on issues relating to older and disabled people including television, radio and other content on services regulated by Ofcom as well as about issues concerning the postal sector.

The Panel engages with stakeholders to inform the advice that it gives to Ofcom and helps to keep the interests of consumers, citizens and small businesses on the agenda across the sector. The Panel also engages with a range of other organisations working on behalf of these constituencies - including those representing older and disabled people.

In September, we responded to the proposed design principles for a Regulated Industries Unit (RIU) noting that the Panel wholeheartedly supports the RIU's development along the lines expressed and appreciating that these incorporated many of the points that we outlined in our response to BIS' earlier consumer landscape consultation. More recently, we have responded to the RIU's draft work programme.

Citizens Advice Scotland and the Panel/ACOD have a number of areas of common interest - notably in post, scams, mobile phones and digital participation. It is therefore very important that we have a strong relationship and co-ordinated policies in these areas. Of course, as part of this, there remains a strategic requirement to be cognisant of emerging issues as well as reacting to more immediate ones.

The Panel's draft workplan for 2013/14 is also currently open for consultation until 19 March and we would be delighted to hear your views on our proposed priorities. Our workplan can be found at <http://www.communicationsconsumerpanel.org.uk/CCP%20Draft%20Workplan%20Final.pdf>

We look forward to working closely in partnership. We also feel that any research into the areas referred to above should be closely co-ordinated; there may even be some opportunities for shared research. In both our areas of work, it is vital that we protect and

promote the interests of citizens and the inactive, silent or more vulnerable consumer- as well as those who are more engaged.

You may be interested in details of research that we are currently undertaking: the Panel has previously expressed concern that in some cases complaints to communications providers are not registered as complaints unless they are escalated. This could lead to a distorted view of customer service levels and possibly disguise true levels of customer service, especially if complaints are not resolved properly. The Panel identified that this is likely to have a particular impact on vulnerable consumers who may not have the skills, confidence, time or persistence to pursue their complaints, or may not know that they can escalate a complaint. While new Ofcom requirements came into force in 2011 to improve awareness of dispute resolution services, the Panel is carrying out new research to establish the extent of consumer tolerance - and their experience of faults -before people even contact their provider to make a complaint. The research will help to establish a more holistic view of the consumer experience from the very beginning of the consumer journey including the experience of faults and fault-reporting. This will lead to a better understanding of what prevents people from registering their complaints and what it is that tips them to complain so that we can help identify the steps necessary to further empower communications consumers. We look forward to sharing our findings with you in due course.

We would support the provision of advice and information to develop policy and practice, in addition to campaigns and for intelligence to be shared widely amongst the relevant stakeholders.

The Panel is also particularly concerned that the current economic climate is likely to impact adversely on small businesses (which form part of the Panel's remit) in addition to risking a detrimental impact on companies' customer service provision.

Yours sincerely

**Jo Connell OBE DL**  
**Chair - Communications Consumer Panel**