

Citizens Advice Scotland: Response to The Communications Consumer Panel and Advisory Committee for Older and Disabled People's (ACOD) Strategic Plan for 2023/24

Scotland's Citizens Advice Network provides an essential community service that empowers people in every corner of Scotland by providing free, confidential, and impartial advice through our local Bureaux and national services. We use evidence about people's real-life experiences to influence policy and drive positive change. We are on the side of people in Scotland who need help, and we change lives for the better.

Background

At Citizens Advice Scotland (CAS), we understand that telecommunications services are increasingly an essential utility for people in Scotland. As the COVID-19 pandemic particularly highlighted, access to a decent internet connection¹ is now vital for many day-to-day activities including work, learning, staying informed and accessing essential public services.

Over the past year, the Scottish Citizens Advice network has supported consumers impacted by the cost-of-living crisis; and used evidence and insights from this work to support colleagues across the telecommunications sector to deliver positive outcomes for consumers. Data from Citizens Advice network has shown that affordability is a top priority for telecommunications consumers; as well as protections for vulnerable consumers; and connectivity resilience and choice for consumers in Scotland's rural and island communities. We have warmly welcomed the significant work undertaken by Ofcom to introduce voluntary measures to support vulnerable consumers, and to encourage more providers to offer and promote social tariffs and we note the significant developments in this market in the past year.

CAS comments

CAS welcomes the opportunity to respond to the Communications Consumer Panel and Advisory Committee for Older and Disabled People's Strategic Plan for 2023/24. CAS has found the Panel's engagement and functions to be incredibly useful for our advocacy work when representing the experiences of telecoms consumers in Scotland.

CAS agree with the Panel's strategic focus of Inclusivity and Equality in the Communications Sector, as we see clients across Scotland being negatively impacted in their access to communications services due to barriers of cost, geography, and vulnerability.

- The Citizens Advice network in Scotland have consistently supported clients through the Cost-of-Living crisis, with many experiencing affordability issues in relation to the fixed broadband and mobile markets. Cost barriers are preventing many clients from accessing the internet and essential online services.

¹ Defined by Ofcom as a download speed of 10 Mbit/s and an upload speed of 1 Mbit/s,

- Likewise, the Scottish Citizens Advice network has reported that many clients living in rural and island communities have experienced significant connectivity issues ranging from unstable and unreliable connections to entire communities being disconnected for periods of time.
- CAS has also been alerted that many clients, who would be regarded as vulnerable customers within the telecoms market, have been inadequately supported by their telecoms providers. The Scottish Citizens Advice network have reported that many providers have failed to support vulnerable clients with very basic additional access requirements.
- Many digitally excluded clients supported by the Scottish Citizens Advice network are excluded not purely by cost or infrastructure, but also due to lacking the skills, confidence and support required to access essential online services. Bureaux report spending increasing amounts of time supporting clients, many of whom could otherwise self-serve, to access increasingly digitised public services. CAS advocates for channel choice as an essential way to ensure people in Scotland are not disadvantaged by increasing digitisation of services.

A basic right to access to communications services

CAS agrees with the Panel's principles set out under this heading. Now more than ever, consumers require reliable and affordable internet access in order to carry out essential daily tasks online, such as accessing online banking, online welfare services and seeking advice online. It is essential that consumers can access the internet with confidence and participate digitally.

Excellent standards of service and of customer service

CAS agrees with the Panel's principles set out under this heading. CAS are concerned that telecoms providers are failing to meet the additional access needs of many vulnerable consumers, which is further exposing them to harm and detriment. CAS are aware that several clients of the Citizens Advice network in Scotland experienced significant detriment as a result of telecoms providers not adequately supporting clients experiencing mental health difficulties. Additionally, several Citizens Advice Bureaux have reported that telecoms providers have failed to engage with advisors effectively when they are representing on a client's behalf. CAS believes that is essential for providers to uphold excellent standards of service, particularly through the cost-of-living crisis in which many consumers may require additional support.

Industry and policy-makers to listen actively to consumers' evolving requirements, to learn and adapt services and policies

CAS agrees with the Panel's principles and plans for work set out under this heading. CAS believes that both consumers and providers would experience significant gains if providers, industry, and policy makers were to better understand the evolving needs of consumers. As the COVID-19 pandemic and current cost of living crisis have shown, the needs of consumers within the telecoms market can evolve rapidly. We thoroughly welcome the Panel's proposed research looking at what "vulnerability" means to consumers with additional access requirements.

Specific policy areas of particular focus for us in the coming year

Affordability and debt

CAS welcomes the Panel's policy focus on affordability and debt. While we have seen positive developments in the telecoms market in relation to Social Tariffs and measures to support customers in debt, CAS are disappointed that many consumers are still experiencing issues around affordability and inadequate support for customers in debt. CAS have been made aware that clients of the Citizens Advice network in Scotland have not been offered the necessary support while experiencing debt within the telecoms market, with some providers failing to engage with Citizens Advice Bureau advisors who are supporting their clients. CAS further welcome the Panel's planned research into the experiences of consumers who are on low incomes and qualify for social tariffs; and the plans to look into the purchasing decisions and experiences of young consumers entering the communications market for the first time.

Wide-scale change in the communications sector: keeping consumers, citizens and micro-businesses informed in a timely and inclusive manner

CAS welcomes the Panel's policy focus on ensuring that consumers, citizens, and micro-businesses are informed of significant changes to internet infrastructure throughout the UK. CAS remain concerned that consumers are unaware of the potential impact that the migration to Voice Over Internet Protocol may have on consumer services and essential services including smart meters, and telecare devices.