

Response to the Communications Consumer Panel draft strategic plan 2023-24

By email to: contact@communicationsconsumerpanel.org.uk

About us

1. Consumer Scotland is the statutory body for consumers in Scotland. Established by the Consumer Scotland Act 2020, we are accountable to the Scottish Parliament.

Our purpose is to improve outcomes for current and future consumers and our strategic objectives are:

- to enhance understanding and awareness of consumer issues by strengthening the evidence base
 - to serve the needs and aspirations of current and future consumers by inspiring and influencing the public, private and third sectors
 - to enable the active participation of consumers in a fairer economy by improving access to information and support
2. Since our establishment in April 2022, Consumer Scotland has engaged with Ofcom's Communications Consumer Panel (CCP) and Advisory Committee for Older and Disabled People (ACOD) to identify issues of concern to communications service users in Scotland. We are grateful for the support provided by the Panel to Consumer Scotland in our first year of operation and we look forward to continued collaboration, along with participation in the Panel's meetings in the coming year.

Summary

3. We consider that the CCP/ACOD plays an important role in considering the needs and experiences of consumers overall, and in particular, identifying where consumers may experience barriers to accessing services. We also welcome the role of the CCP/ACOD in considering the needs and experiences of micro-businesses who have up to ten employees. As the definition of consumer in our founding act includes small and micro-businesses, we are supportive of this focus on their needs.
4. In relation to the draft strategic plan Consumer Scotland:
 - supports the strategic focus on inclusivity and equality in this sector
 - welcomes planned research on consumer vulnerability and access to essential services
 - agrees that consumer experiences of those in rural and remote areas need to be better understood and encourages the Panel to engage with Ofcom on this
 - welcomes the opportunity to work with CCP/ACOD and share understanding with a view to improving the experience of consumers across all communications sectors.

Excellent standards of service and of customer service

5. We welcome the CCP/ACOD's view that excellent standards of service and customer service are vital for consumers. Consumers pay for services and should be able to expect a good level of quality of service from all their providers.
6. The quality of service that consumers experience in the parcels market in particular, has been generally poor enough to move Ofcom to change its guidance to parcel operators in order to improve standards. Competition can, to a degree, support the development of good customer service, however without set minimum service standards, consumers who can only use low cost services may face poorer outcomes, which Citizens Advice's [Parcels league table](#) highlights.

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

7. We welcome the CCP/ACOD calling upon Ofcom and providers to examine complaints and feedback provided by consumers on social media. The complaints process for lost goods in the parcel market is often time-consuming and difficult to access, which Citizens Advice's storybook on [Parcel Complaints Journeys](#) shows. Capturing this information using improved monitoring of social media would support Ofcom's understanding of the severity of the issue for consumers, which would help to inform improved redress procedures and positive outcomes for those experiencing poor service.

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

8. We note the interest and concern around the migration to Voice-over IP (VoIP) technology for telephone calls, in particular around the lack of widescale communications campaign and the lack of action to mitigate risk of harm to consumers. Supporting consumers with the migration to VoIP and the transfer away from 2G and 3G services also features in the Consumer Scotland Work Programmeⁱ. We plan to conduct analysis of the available data to examine which consumers in Scotland are most at risk of experiencing harm during and after the switchover. We will work with other stakeholders, including regulators, advice agencies, providers and organisations.
9. We are aware of the insights gathered by the CCP/ACOD on technological changes in the industryⁱⁱ and look forward to working together to highlight and protect consumer interests during the impending switch from traditional landlines to VoIP and the transfer away from 2G and 3G services.

Affordability and debt

10. We welcome the commitment to commission research on consumer views and responses to the term 'vulnerability,' and the factors that may prevent consumers in

vulnerable circumstances from accessing services. A key area of focus for Consumer Scotland is to ensure we have regard to the needs of consumers in vulnerable circumstances and effectively advocate for these needs to be metⁱⁱⁱ. Further data and information about how consumers view the topic will therefore be valuable to our work and that of others in the consumer landscape.

11. Evidence suggests that consumers in vulnerable circumstances do not necessarily recognise themselves as such^{iv}, therefore more research into consumer understanding of the term may provide further insight into what drives self-identification as a vulnerable consumer, and therefore how barriers to accessing support can be removed or reduced.
12. We welcome the commissioned research into the experiences of consumers who are on low incomes and qualify for social tariffs. We are aware of previous research in this area which highlights low levels of consumer awareness and uptake. Even amongst those consumers who were aware of or eligible for social tariffs, there was reluctance to take up these offers due to perceived barriers around switching and concerns around lower speeds on offer.^v With mid-term price increases causing more financial pressure for consumers, we welcome any steps to ensure that consumers are aware of affordable options and can switch to these easily where they are suitable for their circumstances.
13. Consumer's Scotland's work plan for 2023-24 includes a commitment to work on affordable essential goods and services. We anticipate that this work will allow us to engage with businesses, regulators and policy makers on how different pricing models could be developed and applied to improve the affordability of essential goods and services for consumers in Scotland, including consumers in rural and remote areas. We will work to ensure increased adoption and uptake of pricing models that improve affordability for consumers in vulnerable circumstances.

Postal services

14. We welcome the opportunity to work with the CCP/ACOD to improve postal services to meet the needs of consumers. We agree that the consumer experiences of those in rural and remote areas needs to be better understood and we look forward to the research findings. Consumers in such areas are also less likely to have access to adequate telecoms services, with 14% of rural households in Scotland receiving below 10Mbit/s broadband speeds and only 85% of Scottish indoor premises having 4G coverage from all main operators.^{vi} We consider there is potential for cumulative disadvantage across communications services in general.
15. For consumers who are not online, postal services remain a particularly critical communication method for to allow them to access essential services, such as finance, healthcare or social security. We would encourage the Panel to engage with Ofcom to develop greater insight and knowledge around what consumers send in the post, and the importance of those items, in order to prevent detriment to those living in rural and remote communities, and particularly those in vulnerable circumstances.

16. We would encourage the CCP/ACOD to consider what letters are sent to customers / clients by other industries, particularly by public agencies and from within regulated markets, to develop an awareness of communication needs across the sector, particularly for older and disabled people.

Digital privacy and ethics

17. We agree with the CCP/ACOD that all consumers who are able to go online should be able to do so safely and confidently.

18. Consumer Scotland would welcome engagement from the CCP/ACOD with the ongoing passage of the Digital Markets, Competition and Consumer Bill as it progresses through Parliament^{vii}. The implications of this bill could be wide-ranging for digital consumers, including those in vulnerable circumstances, and especially those with lower levels of digital literacy. It will also aim to protect consumers from a wide range of digital commercial practices which can distort consumer behaviour and influence choices in ways which risk consumer detriment^{viii}. We believe that the Bill could be of interest to the CCP/ACOD as part of its work to help consumers access digital services safely and securely.

ⁱⁱ [Switchover from analogue to digital telephony: UK consumer and micro-business reactions \(2021\) - Communications Consumer Panel](#)

ⁱⁱⁱ <https://consumer.scot/media/mhlnwec4/consumer-scotland-work-programme-2023-2024.pdf>

^{iv} [UKRN Literature-Review_200320.pdf](#)

^v [Broadband social tariffs: awareness and concerns about the speeds offered are hampering take up - Which? Consumer Insight](#)

^{vi} [Connected Nations 2022: Scotland \(ofcom.org.uk\)](#)

^{vii} [A new pro-competition regime for digital markets - government response to consultation - GOV.UK \(www.gov.uk\)](#)

^{viii} [Sarah Cardell: Ensuring digital market outcomes that benefit people, businesses and the wider UK economy - GOV.UK \(www.gov.uk\)](#)