



Communications
Consumer Panel

and Advisory Committee for Older
and Disabled people



Panel Defnyddwyr
Cyfathrebiadau

a Phwyllgor Cynghori pobl Hŷn
ac Anabl

The Panel's National Stakeholder Hubs - April/May 2023

The Panel's National Stakeholder Hubs recently focused on work that the University of Liverpool, Good Things Foundation, Welsh Government and others are doing to explore developing a Minimum Digital Living Standard (MDLS) for UK households across the UK.

We also heard from representatives of Which? on the key findings from its latest research on the consumer impacts of the cost-of-living crisis in the devolved Nations and across the UK.

Developing a Minimum Digital Living Standard for UK households

The University of Liverpool, Good Things Foundation and others have been pioneering work to highlight the social importance of providing citizens with the opportunity and ability to engage digitally through development of a Minimum Digital Living Standard (MDLS) across the UK. The Panel believes that access to communications services should be a basic right for all consumers and having heard from our stakeholders earlier this year that digital and social exclusion was a significant concern, we were delighted that the MDLS team was available to provide Hub participants with an update on the important work they have been involved in.

The Minimum Digital Living Standard (MDLS) team has received funding to develop an MDLS for UK households with children, and you can access the latest updates [here](#). Welsh Government also commissioned the team to explore developing a MDLS in Wales and a report summarising the findings, outcomes and recommendations has been published [here](#).

Definition of the Minimum Digital Living Standard:

'A minimum digital standard of living includes, but is more than, having accessible internet, adequate equipment, and the skills, knowledge and support people need. It is about being able to communicate, connect and engage with opportunities safely and with confidence.'

Hub participants discussed the concept of the MDLS and considered the basic 'basket' of digital goods, services and skills that the consumers they represent need to live in a digital world. A summary of discussions across the National Hubs and those who took part can be found below.

- Digital connectivity was regarded as an essential service and therefore should be universally available to secure equality of access for all.
- Participants supported the MDLS's bottom-up approach to digital inclusion, which helped to ensure that the digital requirements of consumers were fully understood.



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- It was recognised that the MDLS would not be identical for all household types and where funding allowed, the team planned to broaden its research to other household types e.g. people living alone and/or with additional access requirements.
- It was highlighted that the MDLS should be regarded as a baseline, which organisations can use to identify any additional requirements for the consumers they represent.
- It was suggested that the digital requirements of residents living in care homes be a future area of focus as a lack of connectivity had been identified as a significant issue in the care industry. The Panel had previously undertaken research on the digital requirements of residents in care homes: [Are the communications needs of residents in care homes being met? \(2021\) - Communications Consumer Panel](#)
- Participants questioned whether the MDLS would cover children with neurodiverse needs as many neurodiverse children prefer socialising online e.g. gaming, and therefore have additional data needs.
- The MDLS seeks to ensure that people are socially included, and it was highlighted that younger people without access to the same digital equipment that their peers have e.g. games consoles, may face exclusion.
- People with additional access requirements may require reasonable adjustments, which can be costly e.g. interpretation services. There are also other additional associated costs to consider such as charging equipment.
- It was suggested that the MDLS be linked to the [United Nations Disability Inclusion Strategy](#).
- Participants highlighted the differences between the digital experiences of people living in rural and urban areas and it was noted that the requirements of rural consumers had been considered in the research commissioned by Welsh Government.
- Participants encouraged the MDLS team to engage with digital health teams across the UK Nations.
- Welsh Government highlighted that the MDLS had been built into Welsh Government's digital strategy, however not all of the levers to successfully implement the MDLS lay with Welsh Government and required wider collaboration with UK government and others.
- Participants were interested to understand how the MDLS would be futureproofed as the digital world is fast paced and ever evolving. The team advised that the definition of the MDLS was worded to capture all instead of being prescriptive. The basis of the MDLS would also be reviewed on a periodic basis - similar to the Minimum Income Standards.
- It was recognised that not everyone wishes to engage online and therefore offline channels should continue to be available, and organisations should avoid implementing digital by default policies.
- Participants were interested to understand how the MDLS would inform the social tariff landscape in the communications sector. The MDLS team advised that



affordability was a key barrier to digital access and therefore did not feature in the MDLS definition. On the topic of social tariffs, it was flagged that [Greater Manchester Combined Authority was undertaking a pilot to provide social housing residents with affordable digital connectivity](#), and one of the emerging findings was that social tariffs were still too expensive for many. It was questioned whether other sectors that were likely to benefit from people becoming digitally engaged e.g. healthcare and education, should help to bridge the affordability gap.

- Digital and data poverty are fundamental issues and can intersect with deprivation across other sectors e.g. the energy sector.
- The importance of being able to communicate via telephone was highlighted e.g. ability to use a smartphone, having sufficient connectivity and data speeds to speak to people over the telephone or via online platforms e.g. Microsoft Teams.
- It was flagged that data speeds prescribed under the broadband USO are likely to be inadequate and should be reviewed.
- Participants were interested to understand the costs associated with the MDLS and highlighted the importance of ensuring that people were armed with the required digital skills to engage online.
- It was suggested that the costs associated with digital access be accounted for under welfare state costs and it was flagged that the DWP was seeking evidence on views of adequacy on benefits levels. [The Panel provided a response here: [Communications Consumer Panel and ACOD's response to the Work and Pensions Committee's consultation on Working Age Benefits](#)']
- It was considered that the telecoms sector was lagging behind other essential services, and consumers who were disconnected from their communications services were facing significant detriment.
- There was support for UK Government to appoint a statutory telecoms advocate in Wales and England to help protect communications consumers.

Which? research - the impacts of the cost-of-living crisis on consumers living across the UK

Representatives of Which? provided Hub participants with an overview of the [key findings from its research on the impacts of the cost-of-living crisis on consumers living in each of the devolved Nations and across the UK](#). Hub participants discussed the findings and a summary of the discussion can be found below:

- Which? had called for CPs to waive in contract prices, however recognised that there was limited appetite for such a move amongst providers and was also calling for greater regulation by Ofcom. It was flagged that Ofcom had announced it was reviewing inflation linked in contract price rises.¹
- It was recognised that consumers can sometimes reduce in contract price rises by calling their provider and challenging the increase, however this was likely to

¹ [Ofcom to review inflation-linked telecoms price rises.](#)



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favour those who are informed, engaged and confident and cause detriment to those who lack confidence and are less informed and engaged.

- It was noted that more consumers are moving towards using mobile only as a cheaper option.
- Which? research had found that uptake of social tariffs was very low in the communications sector and inevitably lower income households were likely to be paying more than necessary.
- Participants were interested to understand what people would be prepared to pay for a social tariff. It was flagged that in the water sector, the social tariff model was funded by consumers and research was conducted to understand how much they would be prepared to pay.
- A participant who was previously employed by a communications provider in a retail store advised that staff lacked awareness of social tariffs. In addition, although it was a requirement, not all staff advised consumers of in-contract price rises when they were taking out a contract.
- It was considered that a more consumer-centric culture across the communications sector would help to deliver better outcomes.
- Although switching provider was a common solution for consumers to drive down costs, the option wasn't available to all consumers such as those living in areas where competition was lacking.
- Digital poverty was cited as a significant issue and where broadband services were not available, people were reliant on mobile data which was unaffordable for some.
- Some participants were heavily reliant on 3G services to access the internet - this was a particular concern in light of the impending 3G switch-off.
- There were concerns that consumers tended to negotiate contracts over the phone and where agreements were not provided in writing, a record of the agreement did not exist.
- It was flagged that Which?'s research sample was solely online consumers (not offline) and therefore the extent of the detriment consumers were facing was likely to be much greater.

Stakeholders who took part in our discussions are listed below.



- • **Money and Mental Health Policy Institute**
- • **National Association of Deafened People**
- • **National Farmers Union**
- • **National Federation of Women's Institute**
- • **Northern Ireland Trading Standards
Service**
- • **Ofcom**
- • **Ofcom's Advisory Committees**
- • **People Know How**
- • **RNIB**
- • **Rural Health and Care Wales**
- • **Scottish Government**
- • **Scottish Council for Voluntary
Organisations**
- • **Society of Chief Officers of Trading
Standards in Scotland**
- • **Unite - Retired Members Branch**
- • **Welsh Government**
- • **Which?**
- • **Youth Cymru**
-

For links to research and insights shared by participants across the Hubs - please see below.

- [Learning from Lockdown: 12 Steps to Eliminate Digital Exclusion](#)
- [Includem publication: It Is Not A Choice!](#)
- [Good Things Foundation: Internet access: essential utility or human right?](#)
- [Digital strategy for Wales | GOV.WALES](#)
- [Get online Greater Manchester: digital inclusion pilot for social housing residents](#)
- [SCOTSS National Fair Trading Group - Supermarket & Convenience Shops Pricing Project 2022-23](#)



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For more information on previous discussions across the Panel's National Hubs - please read on. You can find a summary of all previous discussions and see who took part on the Panel's website [here](#).

- Earlier this year, we checked in with our stakeholders to understand what they considered are the top communications issues facing the consumers they represent in the year ahead.
- In October 2022, Ofcom's affordability team provided an overview of its ongoing work to help communications consumers who are struggling to afford their communications services and Hub participants shared insights from their respective sectors.
- In July 2022, Ofcom's Market Research team provided insights from Ofcom's Making Sense of Media programme, which seeks to help improve the online skills, knowledge and understanding of people living in the UK - and participants discussed the findings and online experiences of the consumers they represent.
- In January and February 2022, Ofcom's post policy team provided an overview of its policy proposals for the future of postal regulation and participants discussed consumers, citizens and micro-businesses experiences of the postal sector across the UK. The outputs fed into the Panel's response to Ofcom's consultation on the future of postal regulation.
- In October 2021, Hub participants explored what excellent customer service looks like and considered the benefits of communications providers developing a Customer Charter.
- In June and July 2021, Hub participants fed into our think-piece on making communications services inclusive and accessible - [published here](#).
- In May 2021, we held our first UK-wide Hub, bringing together consumer representatives across each of the UK Nations to discuss the potential impacts of migration to voice-over IP on consumers, citizens and micro-businesses.
- In April 2021, our discussions focused on digital inclusion, skills and confidence; and the importance of equipping consumers, citizens and micro-businesses with the necessary tools to participate digitally.