

Response from the Communications Consumer Panel and ACOD to Consumer Scotland's draft work programme, 2026/27

Who we are

The Communications Consumer Panel, established by the Communications Act 2003, is a group of independent experts with direct sectoral experience. We ensure the citizen and consumer voice is represented in communications policy development and we have dual membership with Ofcom's Advisory Committee for Older and Disabled People.

The Panel pays particular attention to underserved communities, people with access requirements, and people who may be more susceptible to harm, and the needs of microbusinesses, which have many of the same challenges as individual consumers.

We make strong links with other consumer representatives, commission independent research and provide advice, to encourage Ofcom, government departments, industry, and others to look at issues through the eyes of consumers, citizens, and microbusinesses.

Four members of the Panel also represent the interests of consumers in England, Northern Ireland, Scotland, and Wales, respectively. They consult with the key stakeholders in each Nation to understand the perspectives of consumers in all parts of the UK and input these perspectives to the Panel's consideration of issues.

Our response

We welcome the opportunity to comment on Consumer Scotland's plans. As a Panel, we value our strong relationship with Consumer Scotland and their expertise and degree of scrutiny into our mutual areas of consumer interest in Scotland.

Our differing remits enable us to collaborate on issues affecting consumers, citizens and microbusinesses and our response to their proposed work programme reflects our support for their work, both in the sectors we represent and cross-sectoral projects that these sectors can learn from.

In the draft work programme, there are four specific projects which are clearly directly relevant to the Panel's work. We welcome Consumer Scotland's ongoing policy and advocacy work in those areas, which are:

A Universal Postal Service that consumers have confidence in

We have been disappointed by Royal Mail's continuous failure to meet its Quality-of-Service standards particularly affecting consumers in rural, remote, coastal and island locations.

We look forward to engaging with Consumer Scotland in relation to their proposal to scope and design a Post Monitor to identify evidence gaps and provide evidence of Scottish consumers' experiences of letters, parcels and post offices (though the latter are outside of the Panel's remit), including Universal Service Obligation (USO) reform implementation.

Fair and equitable postal services

The Panel believes that a Universal Postal Service is only fit for purpose if it is fair and equitable to all users, by design and in practice. This includes keeping the service affordable by those who rely on it.

We previously pressed Ofcom to include postal services under its ‘Fairness Commitments’ and we believe more can be done - by listening to the needs of consumers who rely on post - to make the service fairer, and sustainable.

We look forward to engaging with Consumer Scotland and other groups, on issues of affordability, difficulties for consumers with no fixed address, and issues faced by island communities.

Fast, affordable and reliable telecommunications

We welcome the opportunity to work in partnership with Consumer Scotland on issues such as affordability, digital inclusion and the rollout of next generation services. These are shared areas of concern for the Panel, as multiple digital transformation exercises converge, threatening to leave consumers behind who are reliant on these essential services, for their health, independence, work, education and social connections.

We recognise that Ofcom, the Department for Science, Innovation and Technology (DSIT) and industry recently met to sign a charter that we hope will see improvements to fairness for consumers, in terms of pricing. We have also supported the improved switching processes delivered by One Touch Switch, though implementation has not been faultless.

Improving information and redress for postal users

There will always be times where a provider’s processes and policies do not serve a consumer effectively and the impact will often not be known unless the consumer makes a complaint.

As Consumer Scotland will be aware, another of our shared interests is access to consumer complaints processes and redress, in each of the sectors in our remit, including postal services. With heavily publicised changes to the postal service, industrial action, the sale of Royal Mail, improving information that is useful for postal users and allows them to access redress will be key to making postal services fair and incentivising improvements in Quality of Service.

Consumer Scotland proposes a piece of research which will be of interest to us and which we will be able to reference in our own work.

Our new Member for Scotland, Sarah O’Neill, who joined the Panel last month (January 2026) has a background in complaints and consumer redress, which we hope will be helpful.

Cross-cutting work

The proposed cross-cutting piece of work: ‘Regulations that deliver for consumers’ includes reference to the commencement of new UK-wide provisions in relation to digital markets, competition and consumer protection and the delivery of new Scottish Government strategies and plans on digital issues and on rural delivery.

We welcome the opportunity to work with Consumer Scotland to avoid duplication and amplify the consumer voice in this area.

Further comments on other cross-cutting work not directly in the Panel's remit but which we support:

- We believe that Consumer Scotland's consumer welfare report, which is due to be published this year will provide a useful reference point on consumer welfare and consumer interests in Scotland, which will be helpful in supporting our own advocacy work in Scotland.
- Advancing the consumer duty - we look forward to seeing the interests of consumers represented by public bodies and Scottish Government when taking strategic decisions, for example to their digital strategy.
- We are pleased to see Consumer Scotland's continued interest in representing small businesses that operate like consumers, which supports our own work in this area.
- With our new Member for Scotland in place, we welcome the opportunity to strengthen our links with Consumer Scotland and other Scottish stakeholders, to our mutual benefit, on behalf of consumers, citizens and micro to small businesses across Scotland.