

# Communications Consumer Panel and ACOD's response to the Consumer Council for Northern Ireland's consultation on its Forward Work Programme for 2022-23

#### About us

As outlined on page six of the consultation document, the Communications Consumer Panel, established by the Communications Act 2003, is a group of independent experts with direct sectoral experience. We ensure the voice of UK consumers, citizens and micro-businesses is represented in communications policy development.

The Panel's job is to ensure that the sector works for consumers, citizens and micro businesses - and in particular people who may be in a more vulnerable position in society. We carry out research, provide advice and encourage Ofcom, governments, industry and others to look at issues through the eyes of consumers, citizens and micro 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 micro-businesses, which have many of the same problems as individual consumers.

Four members of the Panel also represent the interests of consumers in Northern Ireland, England, 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. Following the alignment of ACOD (the Advisory Committee for Older and Disabled people) with the Panel, the Panel is more alert than ever to the interests of older and disabled consumers and citizens.

## Our response

We welcome the opportunity to respond to this consultation on the Consumer Council for Northern Ireland (CCNI's) proposed Forward Work Programme for 2022-23.

We greatly value the CCNI's collaboration and participation in working towards achieving mutual goals to understand, represent and empower consumers, and input into policy.

Working with the CCNI to understand the specific impacts on consumers living and working in Northern Ireland, using postal services and other communications services, has continued to enrich our insights and help inform our own programme of research to prevent duplication.

## The current context

The past year has continued to be overshadowed by the impact of the Covid-19 pandemic, making it harder to conduct consumer research through traditional means, pushing it online and by telephone. At the same time, the pandemic has perhaps highlighted the similarities and differences of experiences of consumers in different parts of the UK. The CCNI has provided a vital role in sharing information on the experiences of consumers in Northern Ireland via the Panel's National Stakeholder Hubs and UK Consumer Advocacy Hubs.



While the pandemic has continued, Northern Ireland consumers have - alongside other UK consumers, experienced an increase in the costs of essential services. However, they have also - uniquely - felt the effects of EU Exit on postal services and mobile call costs.

#### Postal services

Added to the detriment of parcel surcharging, which already means Northern Ireland consumers are paying more than most other UK consumers to have parcels delivered - they have been living with service uncertainty, delays and denial of service.

The Panel has appreciated working with the CCNI to understand the further detriment experienced by disabled consumers in Northern Ireland and we welcomed their robust research, enabling deeper analysis in this area, which helped to frame our 2021 research.

We note that Ofcom has since proposed stronger protections for the UK's disabled parcels consumers and we applied this move.

> We support the CCNI's focus on improving fairness and quality in postal services in Northern Ireland and we look forward to continuing to share insights and evidence to influence policy and industry practices.

### Mobile roaming

Mobile roaming, which is a fact of life for many NI consumers, particularly in the west of Northern Ireland, is also an area of mutual concern, which we have discussed with the CCNI, Ofcom and communications providers.

We support the CCNI's continued focus on mobile roaming and will continue to encourage Ofcom, UK Government and mobile providers to recognise the specific circumstances of consumers living and working in Northern Ireland.

## Looking forward

We believe it is more important than ever that we continue to listen to the voice of Northern Ireland consumers and feed it into policy-making, while CCNI does the same, with their additional scope to provide information to educate and empower consumers.

Consumers in Northern Ireland do not live in one singular essential service sector and are subject to challenges and barriers across them all. We consider the breadth of view that the CCNI has across essential service sectors in Northern Ireland a great benefit in informing our mutual areas of interest.

The CCNI is well-placed to advocate on behalf of consumers using communications services in its complementary remit to the Communications Consumer Panel and to use its reputation as a trusted, independent advocate to educate and inform consumers who use communications services or are subject to digitisation of services in other sectors.

We look forward to continued regular engagement with the CCNI in the year ahead, as participants in our National Stakeholder and UK Consumer Advocacy Hubs and individually.