

Communications Consumer Panel and ACOD's response to the Consumer Council for Northern Ireland on its Draft Forward Work Programme 2020-21

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.

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, the EU, 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 England, Northern Ireland, 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.

Response

Although the Panel has a different statutory remit to the Consumer Council for Northern Ireland (CCNI), we share many of the same goals and objectives in terms of representing the interests of consumers. As an ex-ante statutory consumer panel, we value interaction and collaboration with the CCNI regarding the protection and empowerment of consumers living and working in Northern Ireland, whose daily lives and livelihoods depend on reliable access to communications services.

In our response to the BEIS's Green Paper on Modernising Consumer Markets, the Panel highlighted the need to strengthen the consumer voice across the UK. We recommended further collaboration between appropriate consumer bodies, organisations, relevant charities and NGOs, accompanied by the FSB to represent the interests of micro-businesses to ensure the voices of vulnerable consumers are clearly heard by Ofcom. We have taken forward a series of measures to strengthen the consumer voice, including a UK Consumer Advocacy Stakeholder Hub, National Consumer Stakeholder Hubs and an Industry Forum. We are delighted to be working with the CCNI, Citizens Advice, Which? and Citizens Advice Scotland in these initiatives.

In response to DCMS' consultation on Reforming Consumer Advocacy in Telecoms, we stated that it is our view that the consumer landscape needs both ex-ante and ex-post work and we believe a strengthened role for the Panel, working in partnership with a campaigning advocate (including nations variations) is likely to offer the best outcome for consumers.

We believe strong links between statutory consumer bodies across the UK are essential, especially on issues such as communications policy which is a reserved power. We support the CCNI's attention to its proposed work areas for this period.

Within the postal services sector, we would urge the CCNI to work with us to provide a voice for Northern Ireland's consumers and citizens who are facing uncertainty about potential extra costs being incurred in the communications sector following the EU Exit. The Panel believes that fairness should mean that NI consumers are not charged more extra to send parcels and post than other UK consumers nor excluded from the market. Parcel surcharging is already making it more expensive for consumers and micro businesses in Northern Ireland to shop and do business; it is vital that they are not further disadvantaged. Additionally, they must be protected from the possibility of some businesses outside of Northern Ireland ceasing delivery of goods to consumers in Northern Ireland following EU Exit. The Panel's remit regarding postal services covers the universal service obligation - however, we believe the CCNI is well placed to work with BEIS more widely to negotiate a fair deal for NI consumers and micro businesses.

As stated in the draft forward work programme, you are also able to provide a framework to support NI consumers when things have gone wrong - a framework that we believe could considerably benefit consumers in the communications sector. The broadband USO and migration to voice-over IP networks are wide-reaching initiatives that will affect consumers across the UK. It is therefore crucial that an established consumer advocate in Northern Ireland is able to voice concerns on consumers' behalf and assist NI consumers in accessing redress - as well as providing protection from scams and fraudulent activity that can occur during widescale change campaigns. We welcome the CCNI's input in helping to ensure that consumers in all Nations and Regions of the UK, including NI have access to decent, reliable and affordable broadband that keeps pace with the needs of consumers and micro businesses and the demands placed upon them by the UK Government's Digital by Default approach. We believe that for Digital by Default to work, an inclusive core principle of 'Access by Default' must also be followed.

We look forward to continued engagement with the CCNI in the coming year, in part through the Panel's Consumer Stakeholder Hub and Northern Ireland Hub. We value the CCNI's robust research and will continue to share insights in order to add value and strengthen the consumer voice from all Nations and Regions of the UK.