



## Communications Consumer Panel and Advisory Committee's Response to the Consumer Council Northern Ireland on its Draft 2026-2032 Corporate Plan, 2026-2027 Forward Work Programme, including its Programme for Postal Services

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### Who we are

The Communications Consumer Panel (CCP-ACOD, 'the 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 (ACOD)

The communications sector is a highly technical and fast-moving market - and one that impacts across society and the economy. As a result, the Panel's work is broad and diverse, covering telecommunications such as broadband, fixed and mobile services, spectrum (mobile and TV airwaves), postal services, broadcasting (accessibility, and portrayal and representation of older and disabled people) and digital inclusion, as well as aspects of Online Safety.

The Panel pays particular attention to underserved communities, people with access requirements, and people who may be more susceptible to harm, as well as 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. We act as a 'critical friend' to Ofcom, with a unique relationship that allows us early, confidential access to the regulator's thinking so that we can proactively influence the decisions which matter to consumers.

Four members of the Panel also represent the interests of consumers in Northern Ireland, England, Scotland, and Wales, respectively. They engage 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

The Panel welcomes the opportunity to reflect on the Consumer Council's latest plans. We thoroughly appreciate our regular collaboration with Consumer Council colleagues, through our programme of stakeholder hub meetings and engagement with our Member for Northern Ireland. We value their deep expertise and robust research into matters particular to consumers and citizens in Northern Ireland. Our overlapping remits means

that we are jointly able to interrogate issues of mutual interest, and to share cross-sectoral and cross-UK context.

## Five Priorities

We agree that the Consumer Council's five priorities: Represented Lives, Affordable Lives, Inclusive Lives, Sustainable Lives, and Empowered Lives accurately capture the key challenges currently affecting consumers in Northern Ireland.

The Corporate Plan highlights issues that we recognise from our work with stakeholders across the UK, which carry additional impacts for consumers in Northern Ireland:

- Significant financial pressures, with many households under strain, with lower disposable income, lacking resilience to shocks.
- Complex and often confusing markets, exacerbated by jargon and information overload around new technologies.
- A pressing need for inclusive access as digital and postal markets evolve, which have an impact on the way other sectors function, such as healthcare.
- Consumer vulnerability across multiple demographics, including younger consumers and women.
- Low consumer confidence in effective redress and problem resolution systems.

These realities align strongly with CCP priorities, particularly around digital inclusion, accessible communication, customer services and complaints processes, and fair treatment of all consumers, particularly those in vulnerable circumstances.

## What is missing or needs to change?

Whilst we consider that the right strategic priorities have been identified, we suggest that the following points are taken into account in how the Corporate Plan is scoped and delivered:

### Telecoms

The Forward Work Programme references telecoms research and the need for stronger protection, transparency and redress. Telecoms plays an essential role in economic participation, so the Consumer Council may wish to articulate telecoms as a cross-cutting enabler of all five strategic priorities.

We believe that it is vital that the Consumer Council is designated as the telecoms consumer advocate for Northern Ireland as a matter of priority, with the corresponding work included in the Corporate Plan. We recognise that designation is a decision for the Department of Science, Innovation and Technology and fully support the Consumer Council's wish to strengthen consumer protection in telecoms. However, as yet no organisation has been designated for Northern Ireland. This is a significant gap for a number of reasons. Telecoms is a complex and fast-evolving sector which consumers can find difficult to navigate. As the Consumer Council's Household Expenditure Tracker shows,



communications costs - such as mobile, fixed line and broadband - represent an increasingly large proportion of consumer spend, and we know that increasing numbers of households experience affordability issues. Good connectivity and markets which function well for consumers are essential to everyday living as well as to the achievement of wider social and economic goals, many of which are central to the Consumer Council's Corporate Plan. There are, however, many points of divergence in Northern Ireland which need to be represented in decision-making at all levels. We agree with the government proposals that the Consumer Council is best placed to take on this role, given the fit and linkages across its current remit and operations as well as the depth and breadth of its expertise.

### **Digital access and participation**

We would also highlight that digital access is now foundational across all essential services and conversely, lack of access can be a barrier to opportunity and equity. With this in mind, we recommend making explicit commitments related to collaboration with consumer-focused partner organisations, such as the Panel, on:

- Online safety and digital fraud
- AI driven decision-making transparency and awareness
- Digital-by-default service delivery, without access-by-default being the reality across the UK and without the supportive infrastructure of a reliable, affordable postal service.

We support the Consumer Council's focus on those sections of society who are, for a variety of reasons, excluded from the benefits of digitalisation. It is increasingly important to also consider the 'twin detriment' - for people who have the capacity to engage digitally but are at risk of harm or detriment in doing so, whether through scams or other online harms, or the challenges of navigating the market. We also suggest that the Consumer Council's work on digital inclusion is informed by the Minimum Digital Living Standard.<sup>1</sup>

### **Artificial Intelligence (AI)**

Digital delivery has been one of the most significant changes in the current Corporate Plan period, presenting new challenges for consumer protection as well as opportunities for consumer benefit. The scope and pace of change will be even greater in this next strategic period, with the risk that consumer protection and benefits will lag behind commercial gains, particularly if they are not well represented from the outset. It is therefore important that the Corporate Plan defines how the Consumer Council will approach and resource these challenges and define and measure success, noting the need to continue to adapt as technology, usage and regulation of this space evolves. The Consumer Council might also consider opportunities for it to utilise AI to deliver its own remit and services in

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<sup>1</sup> <https://mdls.org.uk/>



the most efficient and effective way whilst optimising consumer experiences and outcomes.

## **Impact**

Looking across the five priorities, the Panel would propose that Inclusive Lives will have the most transformative impact.

We believe that inclusion is the gateway to fairness, resilience and empowerment across all markets. We believe in looking for ways to include individuals and communities of consumers, which is challenging in fast-moving regulated sectors and complex geopolitical contexts and requires engagement from all consumer representatives.

Key issues that the Consumer Council and the Panel will need to focus on which fall into this category include:

- Difficulties accessing essential services including across digital, telecoms and financial sectors.
- Recognised risks of technology inadvertently deepening exclusion, especially for consumers left more vulnerable as a result of large-scale digital transitions.
- The need for fair design and accessibility standards, ensuring that consumers with additional access requirements can benefit alongside 'mainstream' consumers.
- The essential role of inclusive communication and accessible information, which Panel considers a top priority across the UK communications landscape.

Strengthening inclusion improves outcomes for every other strategic priority: representation, affordability, empowerment and sustainability.

The Panel has a broad remit and is also highly engaged in Affordable, Represented and Empowered Lives. We note the many enduring financial challenges faced by consumers, including some issues and circumstances which are very particular to Northern Ireland. Whilst energy, transport and water are outside our scope, we recognise the importance of sustainability and the linkages with the other Strategic Priorities and markets.

## **Working with Partners**

We believe that consumers are best served by having a range of consumer representative touchpoints to represent them. We value collaboration with the Consumer Council on key areas of mutual interest, such as postal services and cross-sectoral themes such as telecoms and digital inclusion, as well as the wider understanding of consumer challenges and experiences in Northern Ireland.

We especially benefit from the Consumer Council's close engagement with the Panel and its Northern Ireland member and its active participation in our stakeholder hub events at NI and UK level. Our work is informed by the Council's unique programme of research and



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its expert insights, drawing on its extensive consumer engagement and partnership working. We appreciate the sharing of plans and emerging themes at all stages of work, which helps to maximise value and ensure there is a good fit with other organisations' work. We consider that the Consumer Council's investment in partnership working is one of the keys to its effectiveness and endorse its approach in the next Corporate Plan.

The Consumer Council's unique position in the UK consumer regulatory landscape makes it a respected partner in a number of areas such as:

- Affordability and pricing transparency
- Digital inclusion
- Complaints and redress
- Fair treatment of consumers, particularly those in more vulnerable circumstances, including circumstances that may be unique to Northern Ireland.

The Panel has previously worked closely with the Consumer Council on understanding the postal service needs of disabled consumers in Northern Ireland and have commissioned research with consumers in Northern Ireland having sought the expertise of the Consumer Council to understand how best to approach the subject matter.

We would encourage this degree of partnership, which can expand the value of both the Panel and the Consumer Council's research budgets, to provide deeper and more valuable insights to be shared with policymakers and industry.

We are encouraged to hear more about the proposed deliberative engagement programme on sustainability where it touches on the Panel's remit. Through its cross-cutting work, the Consumer Council will acquire insights into the Northern Ireland consumer experience of:

- Digital transitions
- Broadband, mobile and postal market reforms
- Consumer journeys through essential services

We would welcome the Consumer Council's insights on cross-cutting themes. Consumers who are suffering harm and detriment in one sector often suffer with the same challenges when engaging in other sectors. We welcome proposals to facilitate sharing of data on emerging consumer harms, across consumer representative organisations and regulators.

### **Communication and accessibility standards**

Given the Consumer Council's commitment to inclusive communication and outreach and the Panel's shared ACOD remit, having commissioned multiple pieces of research focusing on accessibility, there is substantial opportunity for partnership in shaping guidance and best practice in areas such as:

- Accessible digital information
- Inclusive customer support channels

- Service design for consumers with additional access requirements

## 2026-2027 Forward Work Programme

The Panel supports the Consumer Council's Year 1 priorities and welcomes the following in terms of the correlation with our remit:

- Continued investment in affordability tracking through the Household Expenditure Tracker.
- Work on broadband research and strengthening telecoms advocacy and protections.
- Expanded outreach on consumer rights and financial literacy.

These priorities align well with CCP's own goals relating to inclusive, fair, accessible communications and essential services.

We would welcome more information on digital exclusion from a Northern Ireland perspective.

Empowered Lives points to stronger redress pathways. The Panel would highlight that there is a need for strengthened redress, ranging from postal services, to telecoms, to online services. This is more important than ever given the rise in AI use in customer services, which may benefit companies more than consumers, and consumer use of social media as a complaint mechanism. We look forward to working with the Consumer Council and consumer representatives across the UK to help to address imbalances in consumer/market power.

The Panel's role as a 'critical friend' to Ofcom enables us to input into policy as it is being developed – across communications sectors including the postal services sector. We have commissioned [research](#) into the postal user and micro-business experience across the UK and held meetings with [our network](#) of UK stakeholders to listen for issues affecting them. We find it incredibly helpful to remain closely engaged with the Consumer Council's postal advocacy work which provides important evidence and insights into the needs and interests of consumers in Northern Ireland and advocates for the changes which will benefit them. Postal services remain an area of significant market and regulatory change and challenge for consumers, for example in access to reliable and affordable services. There are some very distinct issues for consumers in Northern Ireland relating, for example, to its geographical position, EU exit arrangements and rurality.

With this in mind, we welcome the Consumer Council's focus in 2026-27 on the affordability of postal services, consumer parcel experiences and the impact of EU Exit on postal consumers. We look forward to considering further research on consumer s' parcels experiences and postal affordability in a NI context, and also to further insights into the impact of EU Exit on postal services.



We also appreciate the range of other projects and areas of work, in particular work on access to post for vulnerable consumers, work to raise consumer awareness as USO reform is implemented, and the range of stakeholder engagement to advocate for consumers in NI at all levels of decision-making.

## **Conclusion**

The Panel strongly supports the direction of the Consumer Council's proposed strategy and welcomes the emphasis on consumer vulnerability, inclusion, fairness, empowerment, and evidence-based advocacy. We recognise clear alignment across our organisations in areas such as telecoms fairness, digital accessibility and improving outcomes for consumers in vulnerable circumstances.

We look forward to ongoing collaboration to ensure that Northern Ireland's consumers; particularly those most at risk of harm and exclusion; are heard, protected and empowered across all essential services.