



Communications Consumer Panel and ACOD's response to DCMS' call for evidence on improving connectivity for very hard to reach premises

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

We welcome the opportunity to respond to the call for evidence on improving connectivity for very hard to reach areas and support efforts to make connectivity universal. We believe that now, more than ever, universal coverage across the UK is vital to ensure that no one is left behind.

Our strategic plan 2021/22¹ outlines our high-level priorities over the forthcoming year and beyond. We believe that consumers, citizens and micro-businesses need access to basic, secure, affordable, reliable, resilient communications services that are both accessible and usable across a variety of devices. The pandemic has propelled us into a digital world, with more people online, and for longer - both narrowing and

¹ [We have published our strategic plan 2021/22 - News releases - Communications Consumer Panel](#)



deepening the digital divide, according to Ofcom's research². We are extremely conscious that a significant number of rural consumers, citizens and microbusinesses are unable to benefit from digital connectivity due to a lack of infrastructure. We would also highlight that connectivity not only encompasses access to infrastructure but also a consumer's ability to access services confidently, engage online safely, and take advantage of the financial, educational and social advantages of being online.

The Panel has always taken a technology-neutral approach to connectivity, not focusing on one type of technology to serve all. The challenges in serving people and businesses in remote rural areas are different to those of delivering the same service to people and businesses in built-up areas. We have welcomed interventions such as the Shared Rural Network, to support the Broadband USO to help people get connected. We urge that connectivity initiatives be designed inclusively and with the aim of connecting harder to-reach consumers, citizens and micro businesses first.

We have previously flagged that 2G and 3G networks remain important to consumers who cannot access a reliable 4G or 5G connection. In addition, many consumers rely on 2G connectivity for a wide range of uses including telecare units, smart meters and making emergency calls in rural areas.

We also remain concerned that some consumers only have access from one service provider, which prohibits unfettered access to a competitive market, drives up consumers' costs and promotes behavioural disengagement.

Insights from our collaboration with stakeholders across the UK

The Panel runs regular consumer stakeholder roundtables across each of the UK Nations, to capture the consumer voice in the communications sector ('National Hubs'³). A wide range of consumer, citizen and micro business-related organisations engage with us, including those representing farming and rural communities, older people, young people, racial equality, mental health, carers, disabled people, and many intersections of the above.

The Hubs have continued to run, as interactive webinars, as opposed to the in-person, roundtable format - throughout the pandemic. We have been grateful to the communications industry, UK and devolved governments and Ofcom for keeping communications networks running during this time, enabling this vital work to continue.

² [Online Nation 2021 report \(ofcom.org.uk\)](https://www.ofcom.gov.uk/consult/condocs/online_nation/online_nation_2021_report/)

³ [The Panel's National Hubs - Communications Consumer Panel](#)



We have repeatedly heard that the National Hubs are a valuable resource to consumer stakeholders who participate and to those whose insights they benefit. The Hub meetings enable participants to learn, understand, debate and give their views on a range of communications sector topics that may not form part of every participant's 'day job' - and to present their own research on issues of shared interest. We have been able to gather insights about new or ongoing issues affecting consumers, citizens and micro businesses from across the UK - that are particular to each Nation and those that are experienced universally, which we have taken to Ofcom's policy teams and into industry and have seen positive action taken, which we have fed back to Hub participants.

To deepen our understanding of the issues facing consumers with poor or no connectivity, we asked Hub participants at a recent meeting how rurality impacted access and use of communications services by the communities they represent. We heard the clear message that communications consumers in rural areas need access to digital as a priority to keep pace with an increasingly digital world. We also witnessed first-hand how important a reliable and fast connection is to participants with access requirements; we needed a strong connection so that our deaf stakeholders could interact with the conversation in real-time, using a speech to text interpreter - and reliable connection that helps blind stakeholders to understand what is happening in the virtual room, without the feedback other senses would give in an in-person environment, where people do not 'freeze' while presenting research or 'drop out of the meeting' unexpectedly.

We would welcome DCMS officials' attendance at a future Hub meeting, to listen directly to the views of our stakeholders. [Please click here to read a summary](#) of the Hub meetings in September and October 2020, on **rural connectivity and the types of issues and impacts that communications consumers living, studying or working in rural areas face**. The summary includes a list of stakeholders who took part and further information on available connectivity initiatives across the Nations.

A summary of all recent Hub discussions can be found [here](#)⁴ and is regularly updated.

We highlight below some specific insights we have gathered recently and we hope the points below will help to inform DCMS' understanding of:

- consumer **demand** for connectivity
- potential **benefits** and
- known **barriers** to connectivity that need to be overcome.

⁴ [The Panel's National Hubs - Communications Consumer Panel](#)



Demand

In March 2021, the Panel was presented with the results of NFU's Digital Technology Survey. The results highlighted that 11% of respondents across England and Wales have no indoor signal at all; 32% have download speeds of 2Mbps or less; 40% believe their broadband speed is sufficient for the needs of their business; and 93% believe broadband is essential for their business. These results highlight that farmers are finding it difficult to take advantage of the digital opportunities available to others. As the government moves towards 'digital by default' - it is imperative that businesses have access to reliable connectivity to complete daily tasks. The results also showed that farmers mostly accessed the internet via 3G or 4G, which supports NFU's call for digital connectivity schemes to be technologically neutral - shifting away from fibre and towards rural-friendly broadband solutions.

NFU also regularly attends the Panel's National Stakeholder Hub (England) and have reported that farmers applying for a broadband connection under the USO have received significant, unaffordable connectivity quotes.

NFU Scotland's digital connectivity survey 2020 found that fixed line to Cabinet with copper lines are the main mechanism in which participants received their broadband connection. An unexpectedly high proportion of respondents are reliant upon mobile connections to receive internet.

Another of our participants, Action for Communities in Rural England spoke to us about the difficulties younger people in rural communities face in using online services, many only having access via a smartphone, which can make accessing work, education and opportunities harder.

We regularly encourage Hub participants to respond directly to public consultations on matters affecting the communities they represent.

Benefits

We have long seen communications services as essential services for all citizens, consumers and micro-businesses and the Covid-19 pandemic has highlighted how a lack of reliable connectivity can leave consumers in extremely vulnerable circumstances. Access to a reliable and resilient connection will enable consumers to unlock the benefits of digital connectivity such as video-calling friends and family, shopping online, moving businesses online, accessing a wide-range of video content; and accessing education/healthcare. We heard from our stakeholders that during the pandemic, in rural areas, many consumers experienced poor or no connectivity with potentially significant consequences e.g. healthcare workers being unable to conduct virtual appointments, workers unable to access online training.



The Panel continues to highlight the potentially harmful implications of the digital switchover amongst consumers, particularly digitally excluded and landline only consumers who tend to be older, disabled and/or in rural areas. We continue to hold discussions with Ofcom and stakeholders on migration of telephone connections from the copper network to digital lines (VOIP), emphasising the importance of safeguarding consumers, particularly consumers in vulnerable circumstances, during and after the migration process. In May, Panel Chair, Rick Hill, chaired a meeting that brought together participants from across the UK Nations, enabling them to learn about the process and highlight any concerns.

Participants told us about the potential impacts on the consumers they represent, and concerns were repeatedly raised around digital exclusion, skills and confidence, and the significant task of getting all citizens connected safely.

Participants emphasised that rural communities tend to be isolated and experience poor connectivity, therefore rural communities would require reliable, resilient digital connectivity in the absence of a landline connection to tackle isolation and loneliness.

We were told that many consumers using text and video relay services would benefit greatly from being able to access faster and more reliable speeds, to enable them to participate in social, health and business calls in real-time. We understand from d/Deaf stakeholders that consumers using text and video relay, and speech-to-text services in rural areas (or connecting with others who are in rural areas) during the pandemic, have found it difficult to participate fully, due to connectivity issues affecting the speed and delivery of the captions and images they rely on.

We also heard that:

- Digital access will enable younger people in rural areas to access education and jobs online meaning greater choice and opportunities.
- Working from home - and therefore having a reliable connection - can have positive outcomes including environmental benefits; healthy lifestyle changes; and businesses moving into rural areas.
- The national economy could benefit by providing the rural economy with digital skills and connectivity.⁵

Barriers

In our response to the Gigabit Take-Up Advisory Group (GigaTAG), we highlighted some barriers to Gigabit Take-up and potential solutions, some of which may be useful as evidence of barriers in providing connectivity to hard-to-reach areas.

⁵ [Rural England research: Unlocking digital potential of rural areas across the UK](#)



Our response is published here⁶.

Additional barriers to take-up:

- Not all consumers with access to digital services possess knowledge of how to utilise their capabilities. Upskilling is essential to help consumers digitally transition.
- Affordability of communications services and devices can be a barrier to many, particularly in areas where there is less choice, such as remote rural areas. Please see notes of the Panel's recent Hub meeting on affordability and debt, which included representation from those speaking for rural consumers and citizens, including Farmers' Union Wales and the NI Department of Agriculture, Environment and Rural Affairs⁷.
- Some consumers consider being online unsafe due to cybersecurity threats and scams. Our recent independent research into fraudulent activity over communications networks⁸ looked at the 'chilling effect' consumers may experience after hearing of scams or being scammed themselves and deciding not to return to use of the service that they were scammed through. Skills based learning through a trusted source would help to build consumer knowledge and resilience online - encouraging consumers to participate digitally.
- Consumers need to be proactive and engaged to seek connectivity and a good package. Those who are disengaged and in vulnerable circumstances need protections to avoid any detriment.
- We have heard from all four of our National Consumer Stakeholder Hubs, that consumers lack awareness of UK and Nation-specific connectivity schemes and how these could apply to their circumstances. Inclusive information on initiatives should be available from trusted sources in clear, jargon-free terms. NFU Scotland, a regular attendee of the Panel's National Stakeholder Hub (Scotland) recently presented to participants the results of its annual digital connectivity survey.

Findings included:

- Mobile and broadband connection is an essential technology in everyday business, and poor connectivity is imposing a significant barrier to innovation on Scottish farms and crofts,
- Cost of installation: members report quotes of installation for improved connections to be several times the maximum value of the grants or funds available,

⁶ [CCP-ACOD response to GigaTAG CfE](#)

⁷ [The Panel's National Hubs - Communications Consumer Panel](#)

⁸ [Our new research on scams has been published - News releases - Communications Consumer Panel](#)



- There is a level of confusion about the various schemes designed to assist connectivity in terms of what is best option,
- Although few respondents had engaged with the Broadband Voucher Scheme, over half of applicants had a negative experience. This was mainly due to suppliers not being well informed and suppliers following up with voucher applications.

We believe that the needs of rural consumers should be considered at development stage of connectivity policies across the UK to achieve inclusive design and ensure that communications work for everyone.

Our new research on digital connectivity during the pandemic

We are soon to publish the Panel's independently commissioned research on consumers' experiences of digital connectivity during the pandemic, which we will share with the DCMS, other departments, devolved administrations, Ofcom and other stakeholders who can make a difference.

The research reveals consumers' needs for connectivity, indoors, in all parts of the UK, to enable people to work, study and stay socially connected, in what have been extreme circumstances. In this qualitative study, we sought to include the views of consumers living and working in rural areas.

We echo DCMS's assertion that rural communities need good digital connectivity to thrive in an increasingly connected world and its commitment to ensure that no part of the UK is left behind. We increasingly believe that access to infrastructure, affordable, secure and reliable services and a skills/confidence are a formula for digital inclusion across the UK.

We welcome further strategy on improving infrastructure, digital skills and confidence to enable safe, confident use of a secure, reliable, affordable connection. We look forward to continuing to provide insights from rural consumers, citizens and micro businesses, to DCMS, to help to close the digital divide.