**The Panel’s National Stakeholder Hubs – April/May 2022**

**Topic of focus: Supporting consumers with additional support requirements in the communications sector.**

Across April and May, consumer representatives from across the UK considered how communications providers could improve how they promote and deliver customer support. We shared our qualitative research findings on available support for communications consumers with additional support requirements, before moving onto a wider discussion on how providers could best support consumers throughout the customer journey.

We asked participants whether the consumers and citizens they represent would self-identify with the word ‘vulnerable’ – a word that is commonly used by regulators, industry and government as a way of describing consumers and citizens who may need additional help or support to access services - and how communications providers could best identify, record and meet the requirements of consumers throughout the customer journey.

**Outlined below are the key messages we heard from stakeholders across the UK.**

1. **Communications providers should ensure that their policies and practices are inclusive by design so that consumers do not face barriers when seeking support.**
2. **Consumers who require additional support might not identify as ‘vulnerable’ so communications providers need to proactively identify consumer’s support requirements.**
3. **Communications providers should adopt a consistent approach to how they identify and record consumer’s additional support requirements.**
4. **Communications providers should widely promote available support services using accessible communications channels; and clear, consistent language**
5. **Cross-sector collaboration and shared learnings could help providers to adopt and drive-up best practice.**

**Background**

Anyone can find themselves requiring additional support in the communications sector, whether it be in the short or long-term.

Circumstances such as having a physical disability, mental or physical health problem, low digital literacy, skills or confidence, living in a ‘hard-to-reach’ remote or rural area or being on a low income can make navigating communications providers’ processes and services more complex. The processes and services used by consumers are often designed without these circumstances in mind, so additional support may be necessary. For people living through a difficult life event, such as bereavement, divorce, or insolvency, a further layer of complexity exists, leaving the person potentially even more at risk of experiencing detriment.

We believe that to achieve fair and equitable access for all consumers, more needs to be done across the communications sector to support and meet the requirements of consumers with additional support requirements. Communications services are widely regarded as essential services and as the cost-of-living crisis continues, it’s more important than ever that communications consumers are receiving the support they need.

**The Panel’s research**

To further understand the requirements of consumers with additional support requirements across the communications sector, we commissioned a research agency to explore what consumers considered the term ‘vulnerable’ to encompass and any barriers they faced when seeking support from communications providers.

The research agency gathered the experiences of a wide range of consumers with additional support requirements and although the research does not cover the experiences of all consumers who require additional support, our findings have helped us to further understand the barriers consumers face when seeking support in the communications sector and these insights have helped shape our recommendations for Ofcom, industry and government.

**Stakeholder input**

Across April and May, participants of the Panel’s National Stakeholder Hubs had an opportunity to discuss our research findings and share the experiences of the consumers and citizens they represent and consider how communications providers could improve how they promote and deliver customer support.

Hub participants were also provided with an update from representatives of Which? on their [recently published Consumer Insights report for Northern Ireland, Scotland and Wales.](https://consumerinsight.which.co.uk/)

See below for a summary of our discussions with stakeholders across the UK. We’ve also included a list of organisations who contributed to these sessions and links to further information.

1. **Communications providers should ensure that their policies and practices are inclusive by design so that consumers do not face barriers when seeking support.**

* Policies and practices developed by CPs should be inclusive by design. To do this effectively, people with additional support requirements should be involved early-on in the development process to ensure that all customer’s requirements are understood and not met retrospectively.
* CPs should develop an inclusive communications policy and train staff to be aware of and better understand consumers with additional access requirements, including the correct terminology to use.
* CPs should adopt the social model of disability (instead of the medical model), recognising that it’s not a person’s disability or difference that makes a person unable to or find it difficult to access particular services, but the barriers in place across society e.g. inaccessible buildings. In addition, adopting the social model would ensure that consumers could disclose to CPs the support that works best for them.
* CPs should recognise that not one size fits all and tailor the customer experience to individual consumers.
* Some consumers are digitally excluded or find it difficult to engage with online processes, which can be exacerbated by the device a consumer is using e.g. using a smartphone to complete an application form, and therefore a multitude of communications options should be available.
* CPs should offer face-to-face support at local physical stores.
* Although moving services online can be cost efficient, CPs need to consider the requirements of consumers who are not digitally active and/or have additional access requirements.
* Consumers should have access to free and accessible support services e.g. certain websites could be zero-rated so consumers can access online support free of charge.
* CPs should adopt a trust-based approach when providing support to customers e.g. requiring customers to complete complex forms and submit evidence is likely to act as a barrier to access.
* Consumers can find it difficult to reach the correct person for assistance and CPs should improve customer service delivery to mitigate this.
* Customer support is sometimes offered via social media channels; however, response rates can be slow.
* Treatment of third parties who support consumers with additional support requirements could be improved as they could also require additional support themselves.
* CPs could improve current processes relating to third-party consent. One example was provided where a carer was unable to assist because the person they were caring for was non-verbal and unable to provide consent over the telephone.
* CPs have the same formal duties e.g. data protection legislation, however their interpretations can be very different. A more uniform approach would help manage consumer, particularly third-party, expectations.

1. **Consumers who require additional support might not identify as ‘vulnerable’ so communications providers need to proactively identify consumer’s support requirements.**

* Some consumers do not identify as ‘vulnerable’ so consumers need to promote support available using clear and consistent language so consumers understand the benefits of flagging their support needs.
* Some consumers are reluctant to disclose that they have a disability/health condition because they don’t think they need additional support, are unaware of available support and/or wouldn’t put themselves in the ‘vulnerable’ bracket.
* Some participants felt that using the term ‘vulnerable’ was appropriate if a person was facing vulnerable circumstances. However, they were uncomfortable with the term being used to describe all people with disabilities, particularly people who would not identify as ‘vulnerable’.
* Concerns were raised that the term ‘vulnerable’ can stereotype consumers who require additional support and carry negative connotations.
* The definition of ‘vulnerable’ can differ and other terms such as ‘priority group’ could be clearer and less ambiguous.
* CPs should train frontline staff to identify any consumers who would benefit from support; and respond well to consumers who have disclosed a support requirement.
* CPs should ask consumers if they have any additional support requirements as a matter of course during various consumer touchpoints e.g. signing up to a contract.
* CPs should seek to build an engagement network with existing customers to ensure regular contact where customers can flag support needs or provide updates on their circumstances – this would be particularly valuable for consumers who experience transient vulnerability.
* Not all consumers will require additional support long-term, and CPs should put in place appropriate processes to check if a customer’s support requirements remain the same or need updating.
* CPs can identify consumers who use support services such as Relay UK and should use this intel to offer additional support where required.

1. **Communications providers should adopt a consistent approach to how they identify and record consumer’s additional support requirements.**

* How CPs identified and recorded consumer’s additional support requirements differed across the sector. For instance, specific support data was sometimes recorded in call notes rather than flagged on a customer’s file. Variables also existed within individual providers’ approaches.
* Providers should ensure that they have a set process for recording support requirements and share the relevant information internally to reduce the need for a customer to unnecessarily repeat their disclosure.
* All CPs should offer a core set of support measures to help a wide range of consumers.
* CPs should provide training to front-line staff on a regular basis to ensure a consistent approach.
* CPs should have a dedicated phone and specialised team for consumers who wish to discuss support requirements.
* Support services such as social tariffs are inconsistent across the sector and could cause consumer confusion and prevent consumers from switching provider. It was noted that the Consumer Council for Water was exploring adopting a single social tariff across the water sector.
* Training should be provided by external organisations who specialise in certain areas e.g. Friends Against Scams, Dementia Friendly.

1. **Communications providers should widely promote available support services using accessible communications channels; and clear, consistent language**

* Not all consumers have the option to rely on friends, family or a carer to provide support, so CPs need to effectively share information on available support with their customer base.
* Information on available support needs to be clear, accessible, consistent and prominent e.g. not in small font on CPs’ websites and available in other formats such as braille, Easyread and BSL. It was also highlighted that the term ‘social tariff’ was unlikely to be understood by consumers.
* CPs should have a range of support services available for consumers to meet various requirements, recognising that not one size fits all.
* CPs should ensure that customer service numbers are clearly displayed and easy to access.
* CPs should signpost customers to organisations who can provide support.
* Support for consumers should be disseminated through third sector bodies to reach people who are less likely to engage with CPs directly. Although, it was noted that third sector organisations have limited resources and the onus should be on CPs to spread awareness.
* Due to lack of information and awareness, consumers might not recognise the benefits of flagging support needs.
* It was suggested that CPs needed an incentive to promote available support, particularly where providing the support conflicted with its commercial interests.
* It was suggested that promoting support services be included in Ofcom’s Fairness Commitments to help drive-up best practice.
* Some consumers do not engage digitally or lack the digital skills to do so confidently and safely so would need to use ‘off-line’ methods of communication e.g. letters. Failure to do so, was likely to create greater social and equality issues.
* It was suggested that one central point for information on support services across the communications sector, and potentially other sectors, would streamline the process for consumers seeking support.

1. **Cross-sector collaboration and shared learnings could help providers to adopt and drive-up best practice.**

* Vulnerability is defined differently across sectors and as a cross-sector issue, more should be done to adopt consistent definitions and terminology.
* Consumers who require support in one sector are likely to require similar support in other sectors and it was suggested that utilities share customer data to streamline the identification process e.g. consumer support requirements be held in one central database. It was noted that energy and water share data using needs codes, however, a central database approach was likely to be difficult to implement due to data protection legislation.
* It was noted that energy companies had started to communicate with customers via WhatsApp, rather than webchat, and were experiencing good outcomes as people are familiar with WhatsApp and found it more intuitive e.g. easier to upload photos.
* Some organisations in the financial services sector have a tool in their apps where customers can disclose any additional support requirements.
* The Consumer Council for Water (CCW) advised that it had effectively raised awareness of support services via social media and media campaigns. CCW emphasised that promoting services was not a one-off exercise and different approaches needed to be undertaken.
* It was highlighted that a central fund existed in other countries for consumer access services. It was suggested that this approach meant provision of support did not conflict with CPs’ commercial interests.

**Stakeholders who took part in our discussions are listed below.**

* **Advice Direct Scotland**
* **Age Scotland**
* **Age UK**
* **The Alliance**
* **Carers Wales**
* **Christians Against Poverty**
* **Citizens Advice Scotland**
* **Competition and Markets Authority**
* **Consumer Council for Northern Ireland**
* **Consumer Council for Water**
* **COSLA**
* **Disability Action**
* **Essential Services Access Network**
* **Federation of Small Businesses**
* **Good Things Foundation**
* **Includem**
* **Independent consumer representatives**
* **Mind**
* **Mencap**
* **National Farmers’ Union**
* **Ofcom**
* **Ofcom’s Advisory Committees**
* **Older People’s Commissioner for Wales**
* **QMU Dispute Resolution Centre**
* **Royal Mail**
* **Royal National Institute of Blind People**
* **Scope**
* **Scottish Government**
* **Scottish Council for Voluntary Organisations**
* **Society of Chief Officers of Trading Standards in Scotland**
* **Supporting Communities**
* **Wavelength**
* **Which?**

**For links to research and insights shared by participants across the Hubs – please see below.**

* [Ofcom research: Affordability of communications services](https://www.ofcom.org.uk/__data/assets/pdf_file/0016/232522/Affordability-of-Communications-Services.pdf)
* Citizens Advice: [Getting support to those who need it: How to improve consumer support in essential services](https://www.citizensadvice.org.uk/about-us/our-work/policy/policy-research-topics/energy-policy-research-and-consultation-responses/energy-policy-research/getting-support-to-those-who-need-it-how-to-improve-consumer-support-in-essential-services/)
* [Christians Against Poverty: Digital Divide](https://capuk.org/fileserver/downloads/general/Digital_divide_briefing.pdf)
* [FSB research: Business without barriers](https://www.fsb.org.uk/resource-report/business-without-barriers.html)
* [Nuffield Foundation: Developing a minimum digital living standard for households with children](https://www.nuffieldfoundation.org/project/developing-minimum-digital-living-standard-households-with-children)
* [Good Things Foundation: National Databank](https://www.goodthingsfoundation.org/databank/)
* [Communications Consumer Panel/ACOD: Response to Ofcom's review of the net neutrality framework](https://www.communicationsconsumerpanel.org.uk/downloads/ccp-acod-response-to-the-ofcoms-2021-review-of-the-net-neutrality-framework.pdf)
* [Dewis Cymru: Find local and national organisations that can help](https://www.dewis.wales/)
* [National Trading Standards: Friends Against Scams](https://www.friendsagainstscams.org.uk/)
* [Microsoft: Be My Eyes - Specialized Help](https://www.bemyeyes.com/specialized-help)
* [Ofcom: Communications services for disabled people](https://www.ofcom.org.uk/phones-telecoms-and-internet/advice-for-consumers/accessibility/services-for-disabled-people)
* [Ofcom: Treating Vulnerable Customers Fairly guide](https://www.ofcom.org.uk/__data/assets/pdf_file/0034/198763/treating-vulnerable-customer-fairly-guide.pdf)

**For more information on previous discussions across the Panel’s National Hubs – please see below.**

* In January and February 2022, **Ofcom's post policy team provided an overview of its policy proposals for the future of postal regulation and participants discussed consumers, citizens and micro-businesses experiences of the postal sector across the UK.** The outputs fed into the Panel's response to Ofcom's consultation on the future of postal regulation. [Click here to read a summary of our discussions across the UK and see who took part.](https://www.communicationsconsumerpanel.org.uk/downloads/ccp-acod-national-stakeholder-hubs---summary-of-discussions-on-postal-services.docx)
* In October 2021, Hub participants explored **what excellent customer service looks like and considered the benefits of communications providers developing a Customer Charter**. To read a summary of our discussions and see who took part, [please click here.](https://www.communicationsconsumerpanel.org.uk/stakeholder-engagement/the-panels-national-hubs)
* In June and July 2021, Hub participants fed into **our think-piece on making communications services inclusive and accessible –** [published here](https://www.communicationsconsumerpanel.org.uk/news/latest/post/763-our-top-tips-on-making-communications-services-inclusive-and-accessible-for-all-consumers)**.** To read a summary of our discussions and see who took part [please click here.](https://www.communicationsconsumerpanel.org.uk/stakeholder-engagement/the-panels-national-hubs)
* In May, we held our first UK-wide Hub, bringing together consumer representatives across each of the UK Nations to discuss**the potential impacts of migration to voice-over IP on consumers, citizens and micro-businesses.** [Please click here to read a summary of our discussions and see who took part.](https://www.communicationsconsumerpanel.org.uk/downloads/ccp-acod-uk-wide-hub-summary---migration-to-voice-over-ip.docx)
* In April, our discussions focused on **digital inclusion, skills and confidence; and the importance of equipping consumers, citizens and micro-businesses with the necessary tools to participate digitally**. [Please click here to read a summary of our discussions](https://www.communicationsconsumerpanel.org.uk/downloads/ccp-acod-national-hubs-summary---digital-inclusion-confidence-and-skills.docx), including the key messages and a list of stakeholders who took part.
* In January and February 2021, our discussions focused on the **affordability of communications services and consumer debt -**[please click here to read a summary of our discussions](https://www.communicationsconsumerpanel.org.uk/.well-known/the-panels-national-hubs---affordability-of-communications-services-and-debt-(summary).docx). The summary outlines the key messages that emerged from our discussions and includes a list of stakeholders who took part.
* In September and October 2020, participants discussed**rural connectivity and the types of issues and impacts that communications consumers living, studying or working in rural areas face -** [please click here to read a summary of our discussions.](https://www.communicationsconsumerpanel.org.uk/downloads/summary-of-the-panels-national-hubs---rural-connectivity-(including-intro).docx) The summary includes a list of stakeholders who took part and further information on available connectivity initiatives across the Nations.
* In December 2020, the Panel published research on **scams and fraudulent activity, exploring how consumers have been targeted across communications channels**. Our discussions with Hub participants on the impacts of scams on consumers, citizens and micro-businesses fed into our research recommendations. [Click here to access our cover report, recommendations and full research findings.](https://www.communicationsconsumerpanel.org.uk/research-and-reports/scammed-exploited-and-afraid-)
* In early 2020, during the initial stages of the Covid-19 pandemic, we discussed **the impacts of the Covid-19 pandemic on communications consumers -**[please click here to read a summary of our discussions.](https://www.communicationsconsumerpanel.org.uk/downloads/ccp-acod-national-hubs---covid-19-consumer-issues-(1).docx)