



The Work of the Communications Consumer Panel and the Advisory Committee on Older and Disabled People

2016-17

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Foreword

Electronic communications, by mobile phone, internet or landline, is integral to everybody's lives now; and for a growing majority, so too is mobile data connectivity. The amount of data used via our mobile phones has grown ten-fold in five years, with some estimates suggesting by 2027 it may be fifty times higher than today. Ofcom's Chief Executive, Sharon White, noted earlier this year that "Consumers and businesses should not be constrained by infrastructure that fails to keep pace with their needs and ambitions."

This hints at Ofcom's priorities but also underscores one of ours. We have continued to highlight that the pursuit of 5G should not be a distraction from achieving better 3G and 4G connections for people in rural areas and other 'not-spots' that struggle to make and receive calls, or to run their businesses online; let alone those who want to download the latest movies, or backup their systems to the cloud. We believe that reliable 100% universal coverage for voice and data should be the goal.

Given the fundamental importance of access we welcomed the provision in the Digital Economy Bill (now Act) for a universal service obligation (USO) for broadband, with the caveat that the minimum speed provided should grow in line with future consumer needs and developments in technology.

The Panel represents the interests of all consumers and gives particular consideration to those who are less well heard, and perhaps less able to get the best out of the market. The importance of promoting and protecting the rights and interests of these people has been recognised by Ofcom who have proposed (via amendments to the General Conditions of Entitlement, which place certain obligations on communication providers) to strengthen the requirement for providers to consult the Panel. In combination with this Ofcom propose expanding the requirement to include the needs and interests of consumers whose circumstances make them potentially more vulnerable, and consult with the Panel in regard to these customers. I welcome this step and the implicit recognition of the value that our work can bring. Following our discussions with all the main providers, I am also pleased with the attention that they are giving to consumers in vulnerable situations and the efforts that they are making to improve in this respect - for example, from enabling easier use of Power of Attorney, to improving staff awareness and training.

I am delighted that the case we have been making for free Caller Line Identification (CLI) has been accepted via a proposed amendment to the General Conditions. This is excellent news for consumers as CLI can enable the recipient to avoid answering unwanted incoming calls and is a defence against nuisance calls. We hope to see this become policy shortly.

Another long-standing concern of the Panel's has been the Alternative Dispute Resolution (ADR) process. Though we were disappointed that the referral period before a complaint can be taken to ADR has not been reduced from the lengthy eight weeks, unless the case

has been deadlocked, we are pleased with the progress on the publication of ADR data as this offers greater transparency in the complaints process.

This year saw the passage of the Digital Economy Bill, within which was an amendment, put forward by our colleagues at Action on Hearing Loss, to allow the Secretary of State to set out regulations imposing requirements on providers of on demand programme services to provide access services, (subtitles, signing and audio description) on their content. This is an issue we have been petitioning for progress on, so I was delighted with the success of this initiative and - should the subsequent legislation be approved - we look forward to advising Ofcom on the development of the related Code.

The Digital Economy Bill also includes provision for the enforcement of mobile bill capping; mobile companies will now be required to offer customers the option to cap their monthly mobile spend. This is a measure we have strongly advocated as a consumer protection against bill shock and debt so we are pleased to see this provision.

Communications markets remain complex and fast paced and over the past year we have seen some significant developments. One of these, the separation of Openreach, will hopefully bring tangible consumer benefits. Of particular relevance, in respect of our ACOD remit, which covers portrayal and participation of older and disabled people, are the changes to the oversight of the BBC, which has seen Ofcom assume the role of regulator to the corporation.

Another significant event is of course the decision to leave the European Union; the Panel is keenly aware of the many consumer and citizen ramifications of this momentous change - we will continue to monitor developments with consumer interest in mind particularly the potential impacts on communications, postal and broadcast markets for consumers and citizens in Northern Ireland, which shares a border with the Republic of Ireland.

This has been an eventful twelve months, and we have strived to provide a regular, constructive insight into the needs of consumers throughout. I hope that this report provides an informative view of the Panel's work. I feel there is significant progress being made toward a more consumer-focused industry and I look forward to the Panel continuing to contribute to this throughout the next year.

Jo Connell OBE DL - Chair, Communications Consumer Panel and ACOD

About the Panel and ACOD

The Panel's objective is to:

"... protect and promote the interests of consumers, citizens and micro businesses in the communications sector by giving advice to Ofcom, the EU, Governments, industry and others."

The Communications Consumer Panel consists of eight independent experts. Established by the Communications Act 2003, 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. We pay 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 face many of the same problems as individual consumers.

The Advisory Committee on Older and Disabled People, ACOD, advises Ofcom about the interests in the communications sector of older and disabled people living in the UK. Cross-membership of the two bodies was established in Summer 2012.

Four members of the Panel also represent the interests of consumers and citizens in England, Northern Ireland, Scotland and Wales. Topography and population distribution vary across the Nations, thus each face different challenges; but, at the same time, similar problems with communications services can have varying impacts and levels of detriment in different Nations. Our National Members liaise with key stakeholders in the Nations to understand the perspectives of consumers and citizens in all parts of the UK and input these to the Panel's consideration of issues. They also attend meetings of the Ofcom Advisory Committee for each Nation so that there is a two-way communication of ideas.

The Panel ensures that the consumer and citizen voice is heard on a broad range of issues, which we address in three main ways:

- Key areas of engagement: proactively pushing issues up the regulatory or policy agenda, or seeking changes in policy;
- Research: stimulating and influencing debate; and informing our policy advice and the work of others;
- Keep under review: the Panel keeps many other issues under review - particularly where we have previously raised concerns and stimulated action - and intervenes where appropriate.

The Panel is highly cost effective, operating on a small annual budget. We remain based at Ofcom's offices so have low overheads. Where appropriate, Ofcom shares data and research with us, so that the Panel need only undertake research in carefully targeted areas where we identify a need for a specific consumer perspective. We meet monthly but conduct much of our work electronically.

The consumer voice within the regulator

The Panel's job is to ensure that the communications sector works for consumers, citizens and micro businesses - and in particular people who may be more vulnerable in the market, because they may require more support in communicating with their provider, or in accessing and using communications services, in the short or long term. Vulnerability can be fluid in nature: people are vulnerable consumers if they are susceptible to detriment and less able to benefit from what communications markets have to offer.

Our single sector specialism generates and sustains a focus and expertise so that we can challenge constructively, offer comprehensive advice and influence the development of policy in a timely way. As well as inviting organisations and individuals to our Panel meetings to hear about their work, we are often contacted by those seeking our advice or input into new policy, research or practice.

We have a small budget for research and focused use of this has contributed evidence and insight to Ofcom's and others' work. Stakeholders - especially communications providers - have told us how useful they find our research, particularly in respect of highlighting consumer issues.

As well as a formal consultative relationship with communication providers, we work closely with them throughout the year, communicating our research findings, assisting them with best practice guidance, and supplying feedback and support as requested. For example, we provided input and insight into the development of Ofcom's guidance for communication providers in regard to publicising services for disabled consumers, and we were pleased with the feedback that both the guide and our input had positively shaped and aided the activities of providers.

We also engage with a range of stakeholders, particularly those representing older and disabled people, to help to keep the interests of consumers, citizens and micro businesses on the agenda across the sector.

Our work in the nations is very important to our overall remit, and as well as our active role in Ofcom's National Advisory Committees, our individual Panel members representing the nations are highly active in their work and effective in keeping the interests of those they represent on the agenda of the Panel.

We have a unique relationship with Ofcom. Sometimes described as a 'critical friend' to Ofcom, the Panel provides robust and independent advice that is constructive, realistic and cognisant of the trade-offs which regulatory decisions may sometimes involve. This is made possible by the fact that Ofcom shares information and ideas in confidence with the Panel at the beginning of regulatory processes, before consulting formally with other stakeholders. This special position enables us to give strategic advice on policies early on in their development, as plans are being formulated, so that consumer and citizen interests can be built into Ofcom's decision-making from the outset.

The Panel's activity is often behind the scenes, shaping policy as it is just starting to develop; and outcomes are often long term. Our intention is to help Ofcom and other stakeholders deliver better policy and outcomes - for individual consumers, citizens, micro businesses and ultimately for the UK economy and society.

"The unique expertise and insight provided by the Consumer Panel and ACOD remains essential to ensuring that Ofcom is held to account and that we maintain a strong focus on consumer outcomes."

Dame Patricia Hodgson, Chairman, Ofcom

"The Panel's evidence of consumer detriment chimes with the concerns expressed by the nations Advisory Committees. Their concerted efforts and voices have had impact. Ofcom's renewed focus on the statutory duty to make the market work for all citizens and consumers is encouraging and refreshing. I hope it continues."

Professor Maureen Edmondson, Chair, Advisory Committee for Northern Ireland

"Just wanted to say a thank you for accommodating us at the Panel last week. We always find it incredibly useful, and this was no exception."

**Dylan Foulcher, Head of Digital Technologies Policy,
Copyright and Enforcement Directorate, Intellectual Property Office**

"The Scottish Government greatly appreciates the support of the Consumer Panel as we've worked to find solutions to the problem of nuisance calls. Their insights in the process have been invaluable, particularly around the complexities of supporting and protecting consumers whose circumstances may mean they are in need of extra help. We look forward to continuing to work with them as the project moves to its next phase."

Laura McGlynn, Policy Officer at Scottish Government

"Speaking with the panel on the changes E.ON have made to provide greater support to vulnerable customers, highlighted that the challenges we face as different industries, are very similar. It was highly valuable to share what we have done, and understand from the Panel the Communications sector perspective."

Vanessa Northam, UK Vulnerable Customer Manager, Residential Operations, E.ON UK

"We'd like to thank the Communications Consumer Panel for the invaluable information and advice it has provided us throughout the Subtitle it! campaign, along with its public backing."

Johanna Taylor, Campaigns Manager, Action on Hearing Loss

Influencing the debate - consultation responses

Consultations are a valuable and effective means to position a consumer perspective at the very heart of the decision-making process. Our responses, which number on average two to three a month, are informed equally by our and others' research; by the valuable information and evidence presented to us by stakeholders and other consumer groups; and not least by our own expertise and experience.

We support our evidence-based written responses with presentations, meetings and events, and through engagement with a wide variety of groups across the sector.

Our 2016/17 responses are in Appendix 1Appendix 1.

2016/17 work areas

The Panel's Work Plan, consulted on and published annually, explains how we have chosen our priorities for the coming year and sets out the areas that we will address. In 2016/17 we undertook a range of work centred on the following key areas of engagement and research projects:

Key Areas of Engagement:

- Broadband/mobile coverage and quality of service
- Nuisance calls and ease of reporting
- Treating consumers fairly including customer service and complaints handling
- Digital engagement/detriment
- Postal Services

Research:

- Digital Footprints - the use of personal data
- Access to broadcast and on-demand content
-

Review:

- Progress on consumer related objectives highlighted in the Strategic Review of Digital Communications including pricing complexity, consumer information and switching
- Affordability and debt
- Consumer implications of changing industry structure
- Micro businesses' experience of communications
- Mobile Payments
- Non-geographic calls
- Spectrum Strategy
- Traffic management

ACOD specific work areas

- Inclusion and accessibility
- Portrayal and participation

Key areas of engagement

Looking back - our work in review

All too often, working in the realm of communications, we need to focus on the negatives; what isn't working, what could be better, which areas are failing the consumer. This is just and right, and unfortunately necessary as our sector continues to fall short of expectations for consumers, businesses and citizens: the latest UKCSI report¹ shows that customer satisfaction for the Telecommunications & Media sector remains the lowest of all sectors ranked.

Our job at the Communications Consumer Panel is to highlight these failings, to suggest potential solutions, and to work with all parties to find workable resolutions and improvements. We do this by focusing our resources on a number of key areas of engagement where we feel there are not only critical issues at stake, but also where we feel we can make a difference - and we push for improvements in these areas.

Broadband/mobile coverage and quality of service

A key topic over the past year has been the proposed broadband USO, and we have made clear our belief that the essential elements of a universal service should include factors of access and availability alongside quality of service, transparent information, redress and consumer representation²³. In tandem with the USO development we are recommending the development of mechanisms for delivering these.

In regard to broadband and mobile coverage we have seen that there is often a lack of effective competition in rural areas, illustrating a market failure that leaves consumers and small businesses disadvantaged. Unless the fundamental economics of rural coverage provision change, the commercial market alone will never achieve universality - so it is imperative that public policy continues to address gaps in the market. However, inner city areas and premises in any location where there is not a reliable or adequate service may also suffer and these consumers must not be forgotten.

Based on our earlier research, we have advocated that the USO should include provision for micro businesses (those businesses employing fewer than 10 people) and we made this point in our submissions to, and discussions with, DCMS, Ofcom and the Department for Business, Energy and Industrial Strategy (BEIS). Micro businesses make up 95% of private sector businesses in the UK, accounting for 33% of UK private sector employment and 18% of turnover.

¹ <https://www.instituteofcustomerservice.com/research-insight/research-library/ukcsi-the-state-of-customer-satisfaction-in-the-uk-january-2017>

² <http://www.communicationsconsumerpanel.org.uk/downloads/deb-comments-final.pdf>

³ <http://www.communicationsconsumerpanel.org.uk/downloads/ccp-acod-response---ofcom-broadband-uso-23-june-2016-final.pdf>

In our previous research into the communications experiences of micro businesses⁴ we found that communications services are vital for these businesses but they often, particularly in rural areas, suffer from poor speeds and coverage, and have the same frustration with customer service that residential customers experience. Indeed, a significant number of respondents in our research were dependent on residential grade communications services, particularly for the Internet. For example, the restaurant in rural Scotland that was involved in our research: on the positive side, were the great benefits of connectivity and the internet. They were embracing the web and social media to market and communicate, but, being in a rural location had caused a range of significant communication issues: the reliability of their internet and mobile signals were ongoing issues, their broadband was very slow, and it was difficult to get a good connection, mobile phone signals were very weak, the card payment machine frequently did not get enough signal to make payments, they couldn't offer customers Wi-Fi and so on.

This first-hand evidence, and more like it, is the reason we have been pushing not only for decent broadband connectivity for modern UK businesses, but mobile data coverage too. Mobile data provides micro businesses - and consumers - with a gateway to other services and connects micro business owners with their customers, employees and suppliers.

We believe universally consistent coverage (the ambition should be 100%) regardless of location must be the aim for mobile voice and data services, with mobile network operators (MNOs) held to account for market failures⁵. We have consistently advised that market pressures on their own will not solve the coverage problem that exists in the UK and pressed for government intervention. We have been pleased to see this refrain now taken up by both Ofcom and Government; recognising this fact enables us all to move forward to find solutions.

We have encouraged Ofcom to work with mobile network operators to ensure that they are fully using their allocated spectrum to best and most efficient effect. Unused but allocated frequencies, for example in rural areas, could be used by others who may have potentially innovative ideas for their exploitation, for example as the bearer for local or community fixed wireless broadband services.

In our response to Ofcom's review of the General Conditions of Entitlement⁶, we stated our view that in relation to minimum service quality levels, contracts should make very clear the options open to users if the provided service falls below the contracted level and either offer a straightforward right of exit (without early termination charge) or proportional billing. For this reason, we believe that provision of a service such as broadband, should be on an 'at least' basis, for example, 'speeds of at least 15mb' to the premises.

⁴ <http://www.communicationsconsumerpanel.org.uk/research-and-reports/realising-the-potential-micro-businesses--experiences-of-communications-services>

⁵ <http://www.communicationsconsumerpanel.org.uk/downloads/deb-comments-final.pdf>

⁶ <http://www.communicationsconsumerpanel.org.uk/downloads/ccp-acod-qcs-14-march-2017.pdf>

Nuisance calls and ease of reporting

Nuisance calls are estimated to cost consumers £406 million / year⁷. These can include silent calls, abandoned calls, live sales calls and recorded sales messages. Older people are reported as receiving a significantly higher number of nuisance calls.⁸ It is a complex area, with no single solution and it requires a joined-up, unified approach involving Government, regulators and industry. One mechanism that the Panel has consistently campaigned for⁹ is Caller Line Identification (CLI) to be offered free of charge for consumers, which is currently not the case among all providers - though we are pleased to see several have done so recently, and we hope others will follow suit. There are few tools available to consumers to combat nuisance calls, but CLI can allow people to make an informed decision about whether to answer a call.

So we are delighted by Ofcom's proposal¹⁰ for CLI, including the provision of a valid, dialable number which uniquely identifies the caller, to be provided at no additional charge. We believe that, since it is the service provided by telephone companies, and paid for by the consumer, that is being abused, then it is right that CLI should be free to all consumers. We support Ofcom's proposal to mandate this requirement under the review of its General Conditions.

We are also encouraged by the new powers given to the Information Commissioner's Office (ICO), enabling it to hold company directors personally responsible and fined up to £500,000 for breaching the Privacy and Electronic Communications Regulations.

Research has indicated that people in Scotland receive a greater number of nuisance calls than people in other areas of the UK. Through our Panel member for Scotland, Mairi Macleod, we have been involved in a number of activities in Scotland, such as the Nuisance Calls Summit Scotland, which have brought stakeholders together to look for practical solutions to help protect consumers and businesses.

The Panel also followed the progress of the pilot scheme carried out by some local authorities in Scotland using call blocking equipment to over 600 older and vulnerable consumers. Following the success of this, we welcomed the announcement that 1500 elderly vulnerable people will receive call blocking devices. However, we feel that the overall need is greater and hope to see a further roll out in future. Additionally, we welcome the call/network level blocking and blacklisting initiatives from some communication providers steps we have advocated¹¹, and hope to see more efforts in this direction, and a commitment to keep these at no additional cost to consumers. Following our encouragement, we were pleased to see Virgin Media offer free CLI to elderly and disabled landline consumers.

⁷ https://www.ofcom.org.uk/_data/assets/pdf_file/0015/80700/annexes_7-8.pdf

⁸ <https://www.ofcom.org.uk/research-and-data/telecoms-research/nuisance-calls/nuisance-calls-2016>

⁹ <http://www.communicationsconsumerpanel.org.uk/downloads/deb-comments-final.pdf>

¹⁰ <https://www.ofcom.org.uk/consultations-and-statements/category-1/review-general-conditions-relating-to-consumer-protection>

¹¹ <http://www.communicationsconsumerpanel.org.uk/downloads/220317-ccp-acod-citizens-advice-scotland-pc-2017-18-final.pdf>

Building on the progress that we made last year, the Panel will continue to work closely with stakeholders on the issue of nuisance calls, and in particular to ensure the proposal for communications providers to provide free CLI for consumers is accepted. We will also encourage communications providers to continue working on innovative solutions that allow nuisance call blocking at network level.

Treating consumers fairly including customer service and complaints handling

“I feel that if you’re paying for something, then you should get the service that they promise you; so perhaps it’s a monetary thing; you know if I’m paying for something I have an expectation.”

Female, 35-64, Scotland

These words, from one of the participants in our previous customer service research¹², resonated strongly with the Panel and spurred us on to be vigorous in our calls for key improvements in this sphere¹³. We are pleased that some progress has now been made, particularly in regard to automatic compensation, Alternative Dispute Resolution (ADR) and landline costs.

We have seen success in our calls for the cost of landlines to be reduced. The wholesale costs of landlines have been falling steadily since 2006 - yet the retail cost to consumers for a standalone landline telecoms service has been dramatically rising since 2009, by around 25% and 49% in real terms¹⁴. This is clearly unfair, and, as the majority of these customers are over 75, it is a retail strategy that has disproportionately penalised some of the potentially most vulnerable in our society. After reviewing the market Ofcom acted to counter this issue by proposing plans to cut bills by at least £5 a month for BT customers that have only a landline - effectively returning telephone line rental prices to their 2009 level and we applaud this move, though it will not compensate those customers that have effectively been overpaying for many years.

The Panel warmly welcome Ofcom's progress in regard to automatic compensation; the proposal¹⁵ will require providers to compensate for slow repairs, missed deadlines and appointments - though we additionally advocate that there should be a clear link to switching delays and problems. We are also strongly of the view that compensation amounts should be meaningful, relatable to the harm caused and not an arbitrary sum.

Take the case of Frank, who took part in our research centred on customer service issues¹⁶. Frank owns a small shop and has a landline for personal use, and broadband which he also uses for work purposes. When Frank moved into a new home he contacted his

¹² <http://www.communicationsconsumerpanel.org.uk/downloads/going-round-in-circles-ipsos-mori-annex.pdf>

¹³ <http://www.communicationsconsumerpanel.org.uk/downloads/deb-comments-final.pdf>

<http://www.communicationsconsumerpanel.org.uk/downloads/ccp-acod-gcs-14-march-2017.pdf>

¹⁴ <https://www.ofcom.org.uk/consultations-and-statements/category-1/review-of-landline-telephone-services>

¹⁵ <https://www.ofcom.org.uk/consultations-and-statements/category-1/automatic-compensation>

¹⁶ <http://www.communicationsconsumerpanel.org.uk/downloads/going-round-in-circles-ipsos-mori-annex.pdf>

supplier two months in advance, to ensure the phone and broadband would be installed for moving day. On the day, it transpired that preliminary work was needed in order to connect Frank's services, and from then on, there followed a series of miscommunications and missed appointments on the side of the supplier:

"It took several weeks of me sitting in the house several times a week to try and get a phone line connected, and a lot of phone calls to [the supplier]... I was having to take time off work and get people to cover me."

As the problem was with Frank's landline, he contacted his supplier from his mobile, which was expensive: *"My mobile phone bill for one month was I think £128, and it was all [phoning the supplier]."*

Frank did not seek compensation because not only did he believe he would not get it, but he was also exhausted by the whole process. Our research showed that he is far from alone in his negative perception of his provider, and in the poor service he experienced. We believe auto compensation is a step in the right direction to help consumers such as Frank.

With regard to the costs of automatic compensation, we urge providers not to pass on the costs for providing automatic compensation to consumers - and hope that Ofcom will monitor this. We believe that it is essential that Ofcom takes into account the cost to communication providers of their current way of dealing with disputes: it is possible that a good automatic compensation scheme, supported by good communication to consumers, will mitigate overall costs. Additionally, providers with a better record in service quality performance should have less to pay out and will theoretically be able to invest more in their infrastructure and new innovations. The ultimate aim should be a quality of service across the board that means compensation is rarely required.

It is the Panel's view¹⁷ that both residential consumers and smaller businesses (and especially micro businesses) should be included in any automatic compensation scheme, and that compensation should be set at a level that is proportionate and meaningful. We are pleased to see Ofcom's proposal that SMEs who buy business products should be provided with greater clarity on the quality of service they are entitled to under their contracts and whether they can claim compensation when problems occur. Although, as Ofcom states, SMEs can negotiate bespoke terms, we would prefer to see tailored tariffs and packages for this important market.

Turning to ADR, we were extremely concerned by the results of an earlier ADR study¹⁸ commissioned by Ofcom which showed evidence of communication providers' poor record keeping and low levels of compliance with rules about referral to the ADR Services. The Panel therefore welcomed Ofcom's announcement of its intention to strengthen the current rules regarding complaint handling by increasing the minimum standards that communication providers' complaints handling procedures must meet¹⁹. We have noted

¹⁷ <http://www.communicationsconsumerpanel.org.uk/downloads/ccp-acod---ofcom-automatic-compensation-july-2016.pdf>

¹⁸ <https://www.ofcom.org.uk/research-and-data/telecoms-research/providers-bills-complaints-switching/adr-access>

¹⁹ https://www.ofcom.org.uk/_data/assets/pdf_file/0032/95873/Review-of-the-General-Conditions-of-Entitlement-Consultation-on-the-general-conditions-relating-to-consumer-protection.pdf

that the publication of quarterly complaint statistics seems to have a tangible effect on providers. We have stated that the Panel would like to see this go further, with the publication of ADR data on referrals and outcomes, and we are pleased to see that Ofcom are ensuring that this suggestion is taken forward. The Panel believes that the publication of the data will enable consumers to make better and more informed choices, in turn making the market work better. However, we have, and will continue to, voice our disappointment that the period before a complaint can enter the ADR process, unless deadlocked, has not been reduced down from the current eight weeks, as we have seen no evidence of any justifiable reason for this and consider this long wait to amount to consumer detriment.

A call for greater transparency has been a key thread throughout our work of the last twelve months, and in our responses to Ofcom and discussions with communication providers. In particular, we are calling for an end to unfair practices, for example, we are concerned by Virgin Media's policy of charging a termination fee when a customer moves to an area not served by Virgin: following discussions with the regulator, we are reassured to see Ofcom investigating this²⁰.

A further unfair practice we are calling for action on is in regard to handset charges. Ofcom's 2016 Tech Tracker²¹ found that of those with a contract including a subsidised phone element, 6% were out of their minimum contract period. Of those out of the contract period (albeit a small base of 107), 72% were paying a similar monthly tariff compared to when they signed up. In other words, although they had paid off the cost of their handset, they were continuing to be billed for it. Although some providers offer the separation of the handset and service element of the tariff, this transparency is by no means common practice and we believe it should be.

Another area in which change is needed was highlighted through our recent Digital Footprints research²², which revealed that a significant minority of consumers are not protected when online. Our independent study of over 1000 internet users found that 15% said they were not using security software, mainly due to a lack of knowledge on how to use it (23%), but also due to affordability issues and negative perceptions. ISPs have a key role to play here and we've been discussing it with them. We firmly believe that ISPs should be required to provide, at a minimum, a basic security software product without additional cost to all users of their internet connection service.

Digital engagement/detriment

It is worth reflecting on the power of good that communications can bring to people's lives - to remind people why it's so important for our country to have accessible services; fair tariffs; a viable broadband infrastructure; a reliable and competitive postal service; 100% mobile coverage; and access to effective redress for when these things go wrong. These things are important because telecoms and the internet are essential services; in today's world, as we move ever faster to 'digital by default' we are severely disadvantaged if we

²⁰ https://www.ofcom.org.uk/about-ofcom/latest/bulletins/competition-bulletins/open-cases/cw_01198

²¹ <https://www.ofcom.org.uk/research-and-data/data/statistics/stats16>

²² <http://www.communicationsconsumerpanel.org.uk/research-and-reports/digital-footprints>

do not have access to these services - the connectivity they enable is vital and can greatly improve and enrich our lives.

During the course of some of our research we met Gillian, a 73 year-old living in Birmingham. Gillian has a fantastic relationship with her family, particularly her 22 year-old grandson. However, a move into sheltered housing in an unfamiliar part of the city, due to her husband's failing health, made Gillian feel socially isolated. But, by learning how to go online she has been able to keep in touch more with her family, using Facebook for example. Furthermore, it has helped her in her role as a carer; booking GP appointments, which Gillian previously did over the 'phone, often taking 20 minutes to get through, she now does online. The internet has enabled Gillian to keep in touch with the world.

While the advantages of online connectivity apply to all groups in the community, they can be especially pertinent to older people, many of whom may be less mobile than younger people, and disabled people. As we saw in the case of Sarah, 30, a participant from our previous research, who has multiple impairments and lives in an urban area in the north of England:

"I had a spell of staying in a nursing home... I ended up very poorly, emotionally, and feeling very, very self-destructive... It didn't help that the nursing home was in a corner with ... no mobile phone signal for most of the time I was there, in most of the areas, and none for my bedroom. They hadn't provided any phones for residents to use either, so then you end up completely cut off, and it's horrible. It makes a huge difference when things happen to avoid it becoming as isolating as that... And when I got similarly unwell a few years later I had a touch screen tablet ... I had my Kindle, and I had my smart phone, and the internet. And I was just as unwell, and just as stuck in bed, but I wasn't bored and I wasn't lonely, and that changed everything."

The experiences of Gillian and Sarah illustrate issues that are, in the opinion of the Panel, critical. A key point they highlight is how increasingly reliant we are on connectivity and the potential detriment that can result from not being connected to the digital world. We need to bridge the digital gap. As we move ever faster to a 'digital by default' future - indeed for many small businesses we are already there - we must ensure that no one gets left behind. This does not necessarily mean ensuring everybody is able to use the internet and has access, though we must give everyone that option; but rather that if people do not wish to, or are not able to, access the internet then they must not end up unduly disadvantaged because of this. For those, like Gillian, who are eager to learn, but perhaps lack the means to do so, it means providing opportunities to engage.

In our response to the DCMS' consultation on the introduction of a new broadband Universal Service Obligation (USO)²³ we stated that the benefits of the growing communications market must be available to all, particularly those who can really benefit, and not just those who are most easily served. It is right and just that digital inclusion is a Government priority. As the above personal accounts testify, connectivity can help reduce

²³ <http://www.communicationsconsumerpanel.org.uk/downloads/ccp-acod---broadband-uso-dcms-primary-legislation-consultation-18-april-2016.pdf>

social isolation; provide access to education, entertainment and public services, including medical services; and benefit the economy by enabling people to find work, or run a business or work from home. In our response to the Libraries Taskforce document Libraries Deliver: Ambition for Public Libraries in England 2016 - 2021²⁴, we said that we believe libraries have a key role to play in supporting digital inclusion - not only through the provision of support for those who are not online or less confident, but also by providing physical connectivity - and we were pleased to hear our stance echoed in statements from the Government, notably in the UK Digital Strategy 2017 policy paper²⁵, which stated an intent to: "develop the role of libraries in improving digital inclusion to make them the 'go-to' provider of digital access, training and support for local communities."

Postal services

The Panel believes that it is vital to maintain a universal postal service that meets the needs of all consumers. This universal service must be financially sustainable, fit for purpose and, crucially, affordable. Ofcom's Communications Market Report 2016 highlighted that stamp prices have increased for the third consecutive year. Although there is a safeguard cap on small universal service parcels up to 2kg, the Panel noted it increased prices for parcels paid for over the counter, whilst freezing online prices²⁶. These increases can have a disproportionate impact on some vulnerable consumers (e.g. older people and those on low incomes) as well as micro businesses, and we have strongly encouraged Ofcom to emphasise to Royal Mail that it could, and would, take action on pricing if necessary in the future.

Given the absence of any meaningful competition, the Panel believes that consumers need to have a strong and active voice in the market. Continued progress on Royal Mail's efficiency is vital - so that cost management and reduction can link directly to sustaining the universal service at an affordable price. It is imperative that the universal service is affordable for all whether they be people on lower incomes and those who live or work in harder to reach addresses, such as remote rural locations or tower blocks²⁷.

We have welcomed Ofcom's investigation of parcels surcharging and highlighted that this affects residential and micro business postal services users in rural and remote areas in Northern Ireland, the Highlands and Islands, the Isle of Wight and others. We believe, too, that access to redress when complaints are unresolved should be well promoted and easy to use - through companies' own escalation procedures or through the Postal Redress Service.

The Panel were extremely concerned that Royal Mail did not meet the minimum quality of service standards required of it under its regulatory obligations during the financial year

²⁴ <http://www.communicationsconsumerpanel.org.uk/downloads/dcms-libraries-june-2016.pdf>

²⁵ <https://www.gov.uk/government/publications/uk-digital-strategy/uk-digital-strategy#digital-skills-and-inclusion---giving-everyone-access-to-the-digital-skills-they-need>

²⁶ https://www.ofcom.org.uk/data/assets/pdf_file/0024/23685/uk_post.pdf

²⁷ <http://www.communicationsconsumerpanel.org.uk/downloads/07022017-ccp-acod-response-to-ofcom-annual-plan-2017-18-final.pdf>

: Royal Mail delivered 92.5% of First Class mail the next working day, against a target of 93.0%. Whilst Ofcom decided it was not appropriate or proportionate to impose a financial penalty for this, it has said that should Royal Mail breach those requirements again, it may consider the imposition of a significant financial penalty. The Panel is very concerned about this failure to meet minimum service standards and will be closely monitoring Royal Mail's future progress. The Panel was very concerned about this failure to meet minimum service standards. Although Royal Mail subsequently met its quality of service targets in 2016/17, we will be closely monitoring future progress.

We will continue to help ensure that the needs of consumers, citizens and micro businesses are central to policy making, so that delivery of a high quality service experience is consistently achieved. To do this, we will engage with Royal Mail, Ofcom and other consumer stakeholders to ensure that consumer and citizen interests are taken into account.

Research

Digital Footprints - the use of personal data

These days, data is big business. But perhaps few of us fully realise the extent to which our personal information is collected, stored and used. Fewer still may feel that we have control over our personal data - and many of us are uneasy about the situation. More and more of our personal data is being collected. This gives rise to two fundamental questions:

1. What are the implications for our individual privacy?
2. How can we control and manage the use of our personal data more effectively?

We commissioned new research²⁸ to build on our earlier report, *Online Personal Data - the Consumer Perspective*²⁹. Much has changed since 2011, but people's concerns about the security and privacy of their online data have increased, not decreased. Our intention was to inform policymakers and the wider public about consumer perceptions of online security, and we made a series of recommendations. We believe these are fundamental to enabling consumers to benefit from this fast-moving area of technological development, rather than suffer detriment as a result of it.

Our recommendations, are divided into those for industry and those for government, regulators and enforcement agencies.

²⁸ : [Digital Footprints: A question of trust](http://www.communicationsconsumerpanel.org.uk/downloads/communications_consumer_panel_digital_footprints-cover_report.pdf)

http://www.communicationsconsumerpanel.org.uk/downloads/communications_consumer_panel_digital_footprints-cover_report.pdf;

[Ipsos Mori's independent research](http://www.communicationsconsumerpanel.org.uk/downloads/digital-footprints-final-november-2016.pdf) <http://www.communicationsconsumerpanel.org.uk/downloads/digital-footprints-final-november-2016.pdf>;

[Research data tables](http://www.communicationsconsumerpanel.org.uk/downloads/digital-footprints-data-tables.pdf) <http://www.communicationsconsumerpanel.org.uk/downloads/digital-footprints-data-tables.pdf>

²⁹ <http://www.communicationsconsumerpanel.org.uk/online-personal-data/online-personal-data-1>

Companies:

- Proactively provide clear and consistent information about the consumer implications of people consenting to supply their personal data;
- All consent decisions to be “opt in” as the default position;
- To facilitate greater consumer control in terms of use of data - through clear information, options and choices;
- To always keep to a minimum the amount of data that they collect and store;
- To store data securely; use it only for the purpose intended; retain it for no longer than is necessary; and check with consumers periodically whether permission is still given to retain the data;
- To follow all relevant legislation and regulation;
- Privacy policies and terms and conditions should be informed by the ICO’s ‘privacy policy checklist’; contain an easily accessible ‘key facts section’ and be short, clearly written and avoid jargon;
- Must be transparent about what information they collect about their consumers and how they will use this information - including whether they will pass it to any third party;
- Should clearly highlight on their websites how consumers can request that their personal information be amended or deleted from the company’s records;
- Explore how best to serve and support low-confidence consumers in vulnerable situations in respect of privacy and security: tangible steps might be ensuring essential information is provided about available resources; with ISPs providing for free a basic level of internet security (antivirus/spyware) by default for all customers and taking a role in highlighting online scams to consumers;
- Staff should be trained and/or have access to information so that they can accurately help consumers with enquires about use of personal data.

Governments, regulators and enforcement agencies:

- Act decisively in cases of non-compliance; and
- Consider producing a Code of Practice and/or good practice guidance

Access services

Our latest research focusses on access services: subtitles, signing and audio description for TV and on-demand programming. The delivery of audio-visual content has been transformed in recent years. We believe that, as far as practicable, everyone should have the opportunity to take advantage of these developments and have equivalent access to both broadcast and on-demand content. We continue to be concerned about the provision of access services and we commissioned a study into the delivery and usage of services, people’s attitudes to these and the barriers that stand in the way of better provision. The results of this research will be published in summer 2017.

Review

Progress on consumer related objectives highlighted in the Strategic Review of Digital Communications including pricing complexity, consumer information and switching

The Strategic Review of Digital Communications set out Ofcom's approach to regulating the communications market for the next decade. As well as better broadband and mobile coverage, the reform of Openreach and the intended resultant investment in fibre, the Review contained specific intentions in regard to consumers and improving the quality of service they receive.

We have seen significant progress in regard to these, for example in the plans to introduce automatic compensation, to make switching easier and to provide clearer information for consumers.

We have previously highlighted our concerns about the barriers to switching faced by consumers and micro businesses, most recently in our responses to Ofcom's consultations on mobile switching³⁰ and the potential removal of mobile notice periods³¹. Barriers to switching face all consumers, but particularly those who are older, disabled, or on lower incomes.

As well as removing technical barriers to switching, the process as a whole should include no financial disincentive for the consumer and no unjustified enrichment for providers. We therefore support the measures, outlined in the Digital Economy Act, making it explicit that Ofcom can set General Conditions³², to facilitate switching between providers.

In our response to Ofcom's review of the General Conditions of Entitlement we noted with pleasure that the proposed consumer protection General Conditions (GCs) are for the most part strengthened and clarified. We welcome the proposal to consolidate the various information and transparency requirements across the GCs into a single condition. However, we do have some concerns about a lack of awareness of access services charges and the levels at which they are set.

We also stated our view that in relation to minimum service quality levels, contracts should make very clear the options open to users if the provided service falls below the contracted level and either offer a straightforward right of exit (without early termination charge) or proportional billing. We also believe that broadband provision should be provided and advertised on an 'at least' basis, for example, 'speeds of at least 15mb' to the premises.

³⁰ <http://www.communicationsconsumerpanel.org.uk/downloads/mobile-switching-june-2016.pdf>

³¹ <http://www.communicationsconsumerpanel.org.uk/downloads/ccp-acod-mobile-switchingadditional--requirement-to-remove--notice-period-charges-sept-2016.pdf>

³² <http://www.communicationsconsumerpanel.org.uk/downloads/ccp-acod-gcs-14-march-2017.pdf>

Affordability and debt

The Panel recognises that alongside the many benefits that the communications market offers consumers come attendant risks.

We have urged Ofcom to require that the debt collection policies of providers take the form of a more specific Code of Practice, that is easily accessible to all and not buried within Terms and Conditions or hidden in the small print. In addition, this should be linked to advice and support for consumers in vulnerable situations, including advice on steps to help avoid or mitigate debt.

We are particularly aware that people who are in more vulnerable positions are more likely to use premium rate services and can unknowingly and rapidly incur high bills. The Panel contributed to the Phone-paid Services Authority's work around protecting vulnerable consumers, including responding to their document on vulnerability³³ and participating in the vulnerability working group. The group worked to develop vulnerability guidance, which was published in June 2016³⁴.

We have also previously raised our concerns with mobile operators, Ofcom and Government that all mobile contract consumers should have the option to cap their monthly mobile spend; avoiding the risk of an unexpectedly large bill through either usage or theft. This was addressed in the Digital Economy Bill (now Act) which amends the Communications Act 2003, giving Ofcom powers to enforce a new requirement for mobile companies to offer customers this feature, and fine up to £2 million for breaches of the rule.

Consumer implications of changing industry structure

The Panel continue to highlight with Ofcom and communications providers areas of potential consumer detriment following consolidation within the industry. We want to ensure that mergers do not lead to a lowering of customer service or experience.

Micro businesses' experience of communications

There are 5.2 million private sector businesses in the UK and 95% of them can be classified as a micro business.

As we highlighted in our evidence to the BIS and DCMS' Business Broadband Review³⁵, our research³⁶ has shown that microbusinesses can also be less empowered consumers and need at least the same protections in the communications sector as individual consumers.

The Panel has called for greater support for this growing market sector from government, industry and communications providers to help them maximise the opportunities presented by communications services. Aside from improving broadband infrastructure and increasing mobile coverage, we would like to see this support take the form of tailored

³³ <http://www.communicationsconsumerpanel.org.uk/downloads/ppp---vulnerability-300915.pdf>

³⁴ <http://psauthority.org.uk/news-and-events/news/2016/june/vulnerability-guidance-now-available>

³⁵ <http://www.communicationsconsumerpanel.org.uk/downloads/ccp-acod-business-broadband-review-bis-dcms---3-june-2016-final.pdf>

³⁶ <http://www.communicationsconsumerpanel.org.uk/research-and-reports/realising-the-potential-micro-businesses--experiences-of-communications-services>

tariffs and packages to introduce more flexible contractual terms that are currently only available to larger corporations; this would essentially be a residential supply but with enhanced support, as well as improved service levels and response times to service faults.

Additionally, contract terms should not unduly impair businesses' freedom to switch due to lengthy fixed terms or hefty termination penalties, and there is also a need to ensure improved co-ordination between multiple providers in the value chain around a single customer - particularly customer-facing and wholesale providers.

Mobile Payments

We have continued to engage with key stakeholders on this subject. such as the Phone Paid Services Authority, paying particular regard to vulnerable consumers, but with the interests of all consumers, citizens and micro-businesses in mind.

Non-geographic calls

We have continued to discuss the new arrangements for non-geographic calls with the Ofcom team. Since 1 July 2015, the cost of calling service numbers has been made up of two parts: an access charge, the part of the call charge that goes to the phone company; and a service charge, which is the rest of the call charge set by the organisation you are calling. The Panel have concerns about a lack of awareness of access services charges and the levels at which they are set and we are addressing these concerns to Ofcom.

Spectrum Strategy

In regard to spectrum strategy we have requested that consideration is given to the impact that any change in spectrum allocation could have on DTT consumers³⁷, and have highlighted our belief that it is vital that the digital terrestrial television platform can remain viable, innovative and competitive so that the interests of consumers and citizens who are not on a pay TV platform are protected, especially more vulnerable people.

Additionally, the Panel believes that the costs associated with any change in spectrum allocation should be borne by businesses that benefit and/or Government rather than consumers. Although, as Ofcom predicts, there are likely to be some benefits to consumers, the primary benefit of reallocation of spectrum to mobile use, in terms of profit and technological opportunities, will be to the phone manufacturers and network operators - they, and/or Government should therefore, in our view, bear the cost of any change.

As we have said previously, we will continue to strongly encourage Ofcom to work with operators to ensure that they are using their allocated spectrum to best and most efficient effect as part of any process to make further spectrum available. We have encouraged Ofcom to operate a 'use it or lose it' approach to spectrum management³⁸.

³⁷<http://www.communicationsconsumerpanel.org.uk/downloads/managing-700mhz-clearance-impact-on-dtt-viewers-final-may-2016.pdf>

³⁸ <http://www.communicationsconsumerpanel.org.uk/downloads/ccp-acod---ofcom5ghzconsumersjuly2016-final.pdf>

Traffic management

We have continued to engage with industry stakeholders on this subject with the interests of consumers, citizens and micro-businesses in mind.

ACOD Specific Work Areas

Cross-membership of the Panel and Ofcom's Advisory Committee on Older and Disabled People (ACOD) was established in 2012. The remits of the bodies remain unchanged but members, in their ACOD capacity, also provide advice to Ofcom on issues relating to older and disabled people including in regard to portrayal and presentation in broadcast content.

In December 2015, the Panel published independent qualitative research, 'Inclusive Communications'³⁹. As a follow-up to this publication, going into 2016, we engaged with communications providers and a range of stakeholders to raise awareness both of disabled consumers' needs and the Panel's recommendations, and to seek good practice that could be shared to raise standards, for example publicising services that area available. We also promoted the Ofcom-led UKRN guide for consumers and citizens: 'Essential Services: getting extra help'.

One of the services the Panel is keen for communications providers to promote is Next Generation Text Service (NGTS). The Panel and ACOD were very interested in two pieces of research that came out in 2016, on the experience of deaf people in accessing telephony: the National Association for Deafened People (NADP) asked deaf people about their experience of using the phone⁴⁰; and BT carried out a customer satisfaction survey⁴¹ of users of the relay service. Text relay and since 2014, the Next Generation Text Service (NGTS) enable deaf people to make and receive calls through an operator who speaks to the hearing party and types their response. The NGT service is provided by BT, but all providers of fixed and mobile telephony are obliged to offer the service to their customers. An important feature of NGTS is the app, NGT Lite, which enables users to communicate without having to have a textphone - just by using a laptop, mobile or tablet.

The Panel also advised and worked with Ofcom and stakeholders from the communications sector and other sectors, on 'A guide to publicising services available to disabled people'⁴² published by Ofcom in August 2016, to which the Panel had contributed, using findings from 'We're Not all the Same'.

³⁹ <http://www.communicationsconsumerpanel.org.uk/research-and-reports/we-re-not-all-the-sameinclusive-communications>

⁴⁰ <http://deafcouncil.org.uk/wp/wp-content/uploads/2016/11/telephony.pdf>

⁴¹

<http://ngts.org.uk/content/news/NGT%20User%20Experience%20and%20Satisfaction%20Survey%20Sept%202016.pdf>

⁴² https://www.ofcom.org.uk/data/assets/pdf_file/0015/81132/guidance.pdf

Following this, Ofcom has proposed in the General Conditions to extend the current protections for end-users with disabilities, which currently apply only in relation to telephony services, to cover all public electronic communications services; a move that the Panel warmly welcomes.⁴³

We have also encouraged Ofcom⁴⁴ to ensure that it has a strong focus on issues of diversity and inclusion. One such example would be ensuring full compliance with General Condition 15 (GC15) and encouraging communications providers to promote services available under GC15 to all their customers (as in the energy sector), to ensure that people in need of additional support do not miss out.

Our ACOD remit includes the portrayal and representation of older and disabled people in broadcasting. We have welcomed Ofcom's reports on diversity in Public Service Broadcasting, but have also urged Ofcom to ensure that its complaints processes - including complaints about the BBC - are open to all, to make sure that the views of older and disabled people can be heard⁴⁵.

The participation of older and disabled people in programmes, and their accurate portrayal, are central to maintaining audiences' confidence and engagement with broadcast content and we have suggested to Ofcom to ensure that it monitors carefully the portrayal and representation of older and disabled people⁴⁶.

We also believe it is vital that Ofcom itself sets a high standard and leads by example when encouraging the promotion of diversity, equality and equality of opportunity in its stakeholders - including broadcasters, where on screen portrayal of disabled people and older people is such an important issue - and we have encouraged them in their work in this regard.

⁴³ <http://www.communicationsconsumerpanel.org.uk/downloads/ccp-acod-gcs-14-march-2017.pdf>

⁴⁴ <http://www.communicationsconsumerpanel.org.uk/downloads/ofcom-annual-plan-response-16-17.docx.pdf>

⁴⁵ <http://www.communicationsconsumerpanel.org.uk/downloads/060317-ccp-acod---bbc-complaints-procedures.pdf>

⁴⁶ <http://www.communicationsconsumerpanel.org.uk/downloads/07022017-ccp-acod-response-to-ofcom-annual-plan-2017-18-final.pdf>

Annex 1: Financial report

	Actual 2016/17	Budget 2016/17
Panel Member Fees	109,556	103,135
Panel Member Expenses	13,807	13,626
Support (inc. Advisory Team, research, consultancy, stakeholder relationships and design and publications)	243,982	244,962

Annex 2: Panel Members

Jo Connell OBE DL (Chair)



After a career in IT, Jo retired as Managing Director of Xansa plc in 2003. She was a Trustee of Help the Aged from 1991 and Chair from 2004-2009 where she played a key role in facilitating and supporting the charity's merger with Age Concern England to create [Age UK](#), the UK's largest older people's charity.

Since 2001 Jo's roles have included being a Non-Executive Director at many information technology and communications companies including [RM plc](#) and THUS Group plc. Jo was also Chair of the [Hospice of St Francis, Berkhamsted](#), Master of the [Information Technologists' Company](#) in 2008/9 and Pro Chancellor and Chair of the Board of Governors at the [University of Hertfordshire](#) until August 2013.

Jo is currently Chair of the [Worshipful Company of Information Technologists charity](#) and a trustee of the [Hertfordshire Community Foundation](#). In 2008 Jo was appointed a Deputy Lieutenant for Hertfordshire. In 2012 she was awarded the OBE for services to older people.

Jaya Chakrabarti, MBE



Jaya is a passionate advocate for engaging business with community through technology to improve people's lives, and was honoured with an MBE in 2014's honours list 'For services to the Creative Digital Industries and the community in Bristol'.

Following two and a half degrees in physics and electronic materials Jaya co-founded digital agency [Nameless](#) in 1999, which became one of the leading creative digital agencies in Bristol. Jaya worked closely with clients including the RFU, Cancer Research, Sony Playstation, Warner Bros, the Home Office and the Food Standards Agency. Following her MBE Jaya set her sights on tackling modern slavery using big data, and set up the social enterprise [TISCreport.org](#) in 2014 (Transparency In Supply Chains Report). TISCreport.org started trading in 2016 and is now the world's largest open data anti-slavery register, built to Government standards, with over 42k organisations with applicable modern slavery statements. It has gathered momentum incredibly quickly and is officially backed by Welsh Government. TISCreport has three tiers of governance with the support of CIPS, BSI, ICC, and many others all committed to the same mission - ending modern slavery in our supply chains.

Outside work Jaya has led projects on democratic engagement, net neutrality, education, privacy, protecting children, women's rights and human rights. Jaya presently serves as Vice President of the Bristol Chamber of Commerce and Initiative. Locally, she has been involved in many cross-sector initiatives with education and technology to increase social inclusion through the use of technology. She served on the board of the Learning and Skills Council for the West of England until its end in 2010.

Rhys Evans (Member for Wales)



Rhys Evans has worked on a range of consumer issues on behalf of vulnerable consumers across a number of sectors including retail, communications and energy in his previous role of Wales Director of Consumer Futures (formerly Consumer Focus Wales).

He was previously Chair of the Consumer Direct Wales Advisory Board, and has advised the [Welsh Government](#) on a number of consumer issues including customer service, consumer engagement, digital inclusion and financial inclusion.

Rhys runs his own business deliver coaching, mentoring and management training programmes. He is a member of the [Association for Coaching](#) and works as an associate to a number of organisations providing coaching, business development and training services.

Chris Holland (Member for England)



Chris Holland was Head of Specialist Dispute Resolution at [BT](#) where he was responsible for a wide range of specialist customer service areas, including all aspects of BT's membership of Ombudsman services: communications. He helped implement the telecommunications ombudsman service (Otelo), and until March 2011 was a non-executive director of the [Ombudsman Service](#) Ltd. He was Chairman of the Otelo Members Board between 2006-2011. Chris held a number of customer services roles in BT, including heading the Chairman and Chief Executive's Service Office between 1987-2001. He was Chairman of the [Postal Redress Scheme \(POSTRS\)](#) between 2013-2015; and was an organisation healthcheck consultant with [Time to Change](#) (a mental health charity).

A qualified counsellor, Chris has done voluntary work with young people. Currently he acts as an occasional consultant across all dispute resolution schemes offered by [IDRS Ltd](#), including the [Communications and Internet Services Adjudication Scheme \(CISAS\)](#); he runs his own consultancy company; and he is a member of the [Voice of the Listener and Viewer](#). Chris was also appointed as Independent Complaint Reviewer for the Centre for Effective Dispute Resolution (CEDR) in November 2016.

Richard Hill, MBE (Member for Northern Ireland)



Following degrees in Applied Maths and Church History, Rick worked as a parish minister for 17 years. He left church work in 2007 to develop a portfolio career.

He is Owner/Director of [Titanic Gap Ltd](#), Media Consultancy, and a Board member of the [Independent Press Standards Organisation](#).

He has previously been Chair of [Northern Ireland Screen Commission](#), Chair of the General Consumer Council for Northern Ireland, Chair of Consumer Focus Post and member of the Consumer Focus UK Board, a member of the [BBC Audience Council for Northern Ireland](#) and BBC Broadcasting Council for Northern Ireland. He was made MBE for services to Broadcast Media 2014.

Mairi Macleod (Member for Scotland)



Mairi Macleod was born and brought up in the north of Scotland and now lives in Glasgow.

She worked for 15 years in the field of access services for television, in particular subtitling – first with the Independent Television Facilities Centre (ITFC), then a long period with the [BBC](#) in London and Scotland, and latterly with [Red Bee Media Ltd](#). Since 2009, she has been doing a variety of freelance work, including social policy research interviewing, training, subtitling and translating.

In 2009, she was appointed to [Ofcom's Scottish Advisory Committee](#) for a four-year term. Mairi Macleod is a volunteer for Deaf Connections, a charity based in Glasgow.

Mairi's term with the Panel concluded in March 2017.

Craig Tillotson



Craig has enjoyed a successful and varied career over the last 30 years in the telecommunications and payments industries as a chief executive, board director and strategy consultant. He gained substantial operations and strategic management experience within [Vodafone](#) and T-Mobile Groups. From 2001 to 2003 he was Product Management Director for Vodafone UK launching Vodafone Live and the original Mobile Broadband product set. In 2003 he became Strategy and Wholesale Director and in 2007 took over the leadership of the UK Consumer Business Unit.

Craig graduated from Cambridge University with a degree in Computer Science and spent the early part of his career as a strategy consultant with McKinsey & Company. For many years he was a specialist telecommunications reserve officer in the Royal Corps of Signals where he was awarded the Territorial Decoration (TD).

In 2012 Craig was appointed as the first Chief Executive of the Faster Payments Scheme Limited. The Faster Payments Service is a world leading real time 24 x 7 retail payments service providing instant movement of money between customer accounts across all banks and building societies in the UK. As Chief Executive he is accountable for the day-to-day operational integrity and strategic development of the scheme and its services. Craig is also a director and Executive Chairman of Paym, the cross-industry mobile payments service launched in 2014.

In 2014 he was also appointed by the Financial Conduct Authority to be a member of the new Payment Systems Regulator's statutory Panel.

Bob Twitchin, MBE



Bob Twitchin was Chair of the Oftel Advisory Committee for Elderly and Disabled People (DIEL) from 2000 to 2004 and a member of the Ofcom Consumer Panel (now the Communications Consumer Panel) from 2005 to 2008. He was a member of the steering group of PhoneAbility until 2015, a charity that was dedicated to improving access to ICT for older and disabled people. Bob is an Associate of the Business Disability

Forum.











Bob is a fellow of BCS, the Chartered Institute for IT, and formerly Chair of ITCanHelp, a network of volunteers providing free help with computing problems to disabled people at home, in day care centres or residential care. ITCanHelp is part of Abilitynet, a UK charity helping disabled people to use computers and the internet to change their lives at work, at home and in education.

He was awarded the MBE in the New Year Honours List Dec 2014 for services to the Telecommunications Industry and People with Disabilities.

Bob has been a licenced Reader in the Church of England since 1990, and in 2013 was a recipient of the Saint Mellitis Medal, awarded by the Bishop of London for his service to the church in London.

Appendix 1

- [Communications Consumer Panel and ACOD's response to Citizens Advice Scotland's consultation on its Policy and Campaigning work plan](#) March 2017 
- [Communications Consumer Panel and ACOD's response to Citizens Advice Scotland's Consumer Futures Unit's consultation on its work plan for 2017/18](#) March 2017 
- [Communications Consumer Panel and ACOD response to Ofcom's consultation on the Review of the General Conditions of Entitlement](#) March 2017 
- [Communications Consumer Panel and ACOD's response to Ofcom's consultation on new procedures for handling content standards complaints, investigations and sanctions for BBC programmes](#) March 2017 
- [Communications Consumer Panel and ACOD's response to Ofcom's consultation on its approach to enforcement](#) March 2017 
- [Communications Consumer Panel and ACOD's response to Ofcom's Annual Plan 2017/18 and Ofcom's Chairman's response](#) February 2017 
- [Communications Consumer Panel and ACOD's response to DCMS call for evidence on extending full fibre networks](#) January 2017 
- [Communications Consumer Panel and ACOD's response to Ofcom's consultation on a Disability Action Plan for Northern Ireland](#) December 2016 
- [Communications Consumer Panel and ACOD's response to Ofcom's consultation on promoting the efficient use of geographic numbers](#) December 2016 
- [Written evidence from the Communications Consumer Panel and ACOD in relation to the Digital Economy Bill](#) October 2016 
- [Communications Consumer Panel and ACOD's response to Ofcom's consultation on the accessibility of on demand programme services](#) October 2016 
- [Communications Consumer Panel and ACOD's response to Ofcom's consultation on Making Switching Easier and More Reliable for Consumers](#) October 2016 
- [Communications Consumer Panel and ACOD's response to Ofcom's consultation on the General Conditions \(1\)](#) October 2016 
- [Communications Consumer Panel and ACOD response to Ofcom's consultation on Strengthening Openreach's Independence](#) October 2016 
- [Communications Consumer Panel and ACOD response to Ofcom's consultation on Consumer Switching: Additional Requirement to Remove Notice Periods](#) September 2016 
- [Communications Consumer Panel and ACOD response to Ofcom's Review of Royal Mail](#) August 2016 
- [Consumer Panel and ACOD response to Ofcom's call for inputs on Automatic Compensation](#) July 2016 
- [Communications Consumer Panel and ACOD response to Ofcom's consultation on improving access for consumers in the 5GHz band](#) July 2016 
- [Communications Consumer Panel and ACOD response to GDS Technology Code](#) July 2016 
- [Communications Consumer Panel and ACOD response to BIS' call for evidence on improving the consumer landscape and quicker switching](#) June 2016 

- [Comments on the Libraries Taskforce document Libraries Deliver: Ambition for Public Libraries in England 2016 - 2021](#) June 2016 
- [Communications Consumer Panel and ACOD response to BIS' consultation on options to refine the UK competition regime](#) June 2016 
- [Communications Consumer Panel and ACOD response to Ofcom's call for inputs into designing the Universal Service Obligation for Broadband](#) June 2016 
- [Response to BIS and DCMS' Business Broadband Review - call for evidence](#) June 2016 
- [Response to Ofcom's consultation on Consumer Switching: Proposals to reform switching of mobile communications services](#) June 2016 
- [Response to PhonepayPlus' consultation on its Vulnerability Guidance](#) May 2016 
- [Response to Ofcom's call for input into managing the effects of 700 MHz clearance on PMSE and DTT viewers](#) May 2016 
- [Response to Ofcom's consultation into its Space Spectrum Strategy](#) May 2016 
- [Comments on the report of the working group on consumer and competition policy for Scotland and the Scottish Government's response](#) May 2016 
- [Response to DCMS' consultation on a new Broadband Universal Service Obligation \(USO\)](#) April 2016 
- [Response to PhonepayPlus' draft guidance consultation](#) April 2016