

Chris Taylor  
Director of Consumer Policy, Ofcom

30 August 2013

Dear Chris

Thank you for your letter of 20 June in relation to Ofcom's compliance with the principles in the Consumer Interest Toolkit.

As you note, in 2004 the Panel came to the conclusion that Ofcom needed a systematic way to think about citizen and consumer interests when making policy, and to ensure that this was recorded. The result was the Consumer Interest Toolkit, which was published in 2006. Three Ofcom projects were subsequently audited against the principles in the Toolkit, and the report of this was published in 2008.

The Panel was pleased to note your statement of Ofcom's commitment to placing citizens and consumers at the heart of everything it does. We share your view that the Toolkit remains relevant today and provides practical guidance about the actions that Ofcom should take to ensure that citizen and consumer interests remain ingrained within Ofcom's DNA.

The data yielded by Ofcom's Contact Team is a valuable source of information, which can be supplemented by the information gained from engagement with consumer groups as well as research. We would also encourage Ofcom to take greater account of the information provided by the ADR schemes. In order to gauge how representative contacts to Ofcom are of the general population, we would suggest that Ofcom undertakes market research to assess the level of awareness of Ofcom and propensity to contact among different groups of consumers and citizens - particularly those who may be more vulnerable. This will be helpful in understanding, in conjunction with data received from other sources, the issues faced by the range of consumers.

We appreciate the depth of your assessment of Ofcom's compliance with the spirit, as well as the letter, of the Toolkit. While broadly compliant, we are pleased to note that you have taken steps to address those areas where some improvement was required - notably by refreshing existing resources, creating clearer documentation and ensuring appropriate resources and training are available to Ofcom colleagues.



In addition to the provision of updated relevant documentation, it is vital that an awareness of the reason for its existence as well as its location is embedded across Ofcom. For this reason we are pleased to note that the materials have been promoted internally, that project managers and directors have been emailed to notify them of the changes, and that this is being reinforced through internal meetings and training courses.

We would encourage Ofcom to undertake an internal assessment of awareness of this material and of the toolkit 12 months after completion of this range of activity.

We are also pleased to note that Ofcom's activity planning templates now prompt project managers to consider publishing Plain English Summaries of external documents. We would strongly encourage Ofcom to consider - at the very least, for every consultation - publishing Plain English summaries. Whilst we recognise that some of Ofcom's consultations are highly technical, the provision of Plain English summaries would represent a significant step forward as it has the potential to broaden audience engagement.

To summarise, we welcome that you have completed a review of Ofcom's compliance with the principles in the Consumer Interest Toolkit and your finding that Ofcom is broadly compliant with both the spirit and the letter of the Toolkit. We are pleased to note that you have taken steps to address those areas where some improvement was required and look forward to hearing more about the effects of these actions as they become further embedded.

To that end, we would recommend consideration by the relevant teams of the following actions for Ofcom:

- To take greater account of the information provided by the ADR schemes.
- To undertake market research to assess the level of awareness of Ofcom and propensity to contact among different groups of consumers and citizens - particularly those who may be more vulnerable.
- To undertake an internal assessment of awareness of the revised documentation and of the toolkit 12 months after completion of this range of activity.
- To consider - at the very least, for every consultation - publishing Plain English summaries.

Yours sincerely

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