

Citizens Advice Scotland Response to Ofcom's Communications Consumer Panel & Advisory Committee for Older and Disabled People (ACOD) Strategic Plan 2021-22

Scotland's Citizens Advice Network empowers people in every corner of Scotland through our local bureaux and national services by providing free, confidential, and independent advice. We use people's real-life experiences to influence policy and drive positive change. We are on the side of people in Scotland who need help, and we change lives for the better.

Summary

Citizens Advice Scotland (CAS) welcomes the opportunity to comment on this plan. We recognise the role that the CCP and ACOD plays in ensuring that the voices of consumers are heard.

We welcome the recognition that there are issues affecting communications consumers, citizens and SMEs. The last year has shown that digital connectivity, access to a landline and a regular postal service are valued and relied upon more than ever before. CAS looks forward to working with the CCP and other stakeholders on these issues over the coming year.

Comments on the Plan

CAS agrees that consumers across the UK need access to basic, secure, affordable, and resilient communications services – and they need the skills to use them safely. We are content with the proposal to merge the "No One Left Behind" strand of work into this strategic priority.

We welcome any work that can be done to bridge the digital skills divide and to ensure that people can access digital services safely and confidently. We also note the continued work necessary to ensure that all consumers across the UK have access to reliable, high quality data connections, which continues to be an issue of concern for many Scottish consumers, especially in remote and rural areas.

CAS also agrees that excellent standards of service and customer service are vital for consumers, during, after and well beyond the pandemic – and that more can be done in this regard. We will continue to use our Social Policy Feedback mechanisms to raise examples of where provider's practices, processes or policies disadvantage consumers. We welcome that the panel will be commissioning research to consider those consumers who prefer a specific contact method for engaging with their provider, due to their specific needs or requirements. We would note that there have been specific issues in this regard that CAS have already highlighted to panel members, such as consumers being unable to access preferred communication mechanisms or providers who were unwilling to engage with advocacy services who were acting on behalf of consumers.

CAS has also conducted work on access to post for some of the more vulnerable groups in society and this work may be of relevance and interest to this discussion and to the panel. We are also aware that the pandemic has had considerable impacts on quality of service in relation to postal deliveries. CAS would therefore welcome further work examining the impact of this on vulnerable consumers and consideration of whether there are ways in which the needs of vulnerable consumers can be prioritised.

We welcome the continued focus on affordability and debt, and in particular, the focus on data poverty. Recent months have shown a rise in the number of consumers contacting Bureaux in Scotland in relation to telecommunications debts, so we believe this focus is necessary.

Finally, we agree with the continued intention to work on prevention of harm to consumers, by examining issues such as the switch to VOIP and the continued rise of scams.

We believe the research commissioned is appropriate and helpful and we are particularly interested in the research into the attitudes of consumers who use parcel services. As you will be aware this is an issue of particular interest to CAS, given that the practice of geographic surcharging has particular impacts on Scottish consumers. CAS continues to call for greater transparency in relation to the pricing practices of retailers and delivery companies in this regard.

Contact information

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