



Communications Consumer Panel and ACOD's response to the Consumer Council for Northern Ireland's draft corporate plan 2021-24

The Communications Consumer Panel, established by the Communications Act 2003, is a group of independent experts with direct sectoral experience. We ensure the citizen and consumer voice is represented in communications policy development.

The Panel's job is to ensure that the sector works for consumers, citizens and micro businesses - and in particular people who may be in a more vulnerable position in society. We carry out research, provide advice and encourage Ofcom, governments, the EU, industry and others to look at issues through the eyes of consumers, citizens and micro businesses.

The Panel pays particular attention to the needs of older people and people with disabilities, the needs of people in rural areas and people on low incomes, and the needs of micro businesses, which have many of the same problems as individual consumers.

Four members of the Panel also represent the interests of consumers in Northern Ireland, Scotland, England and Wales respectively. They liaise with the key stakeholders in the Nations including the CCNI and sit as observers on Ofcom's Advisory Committee for each UK Nation to understand the perspectives of consumers in all parts of the UK and input these perspectives to the Panel's consideration of issues.

Following the alignment of ACOD (the Advisory Committee for Older and Disabled people) with the Panel, the Panel is more alert than ever to the interests of older and disabled consumers and citizens.

Our response to the CCNI

The Panel welcomes the opportunity to respond formally to the CCNI's draft corporate plan for the next three years. We support the CCNI's attention to the telecoms and postal services in its proposed strategy and priorities for the year ahead.

The Panel's Chair, Rick Hill has been engaged in dialogue with the CCNI as they prepared the corporate plan 2021-24 and priorities for 2021-22.

A strong, ongoing working relationship between consumer bodies through challenging times

The strong links between statutory consumer bodies across the UK have proved essential over the last year, both during the Covid 19 crisis and in addressing the challenges of

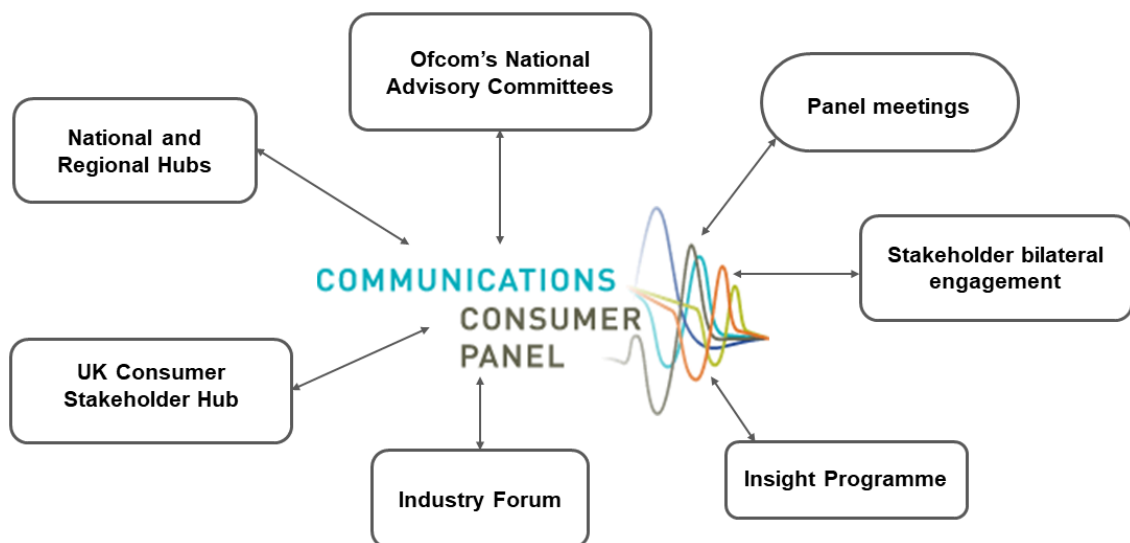
adapting to the Northern Ireland protocol following EU exit. We support the CCNI's continued focus on supporting consumers in NI through the impacts of the pandemic and the transition out of the EU.

We have been pleased to hear from the CCNI regularly at our Hub for NI (featured below under National and Regional Hubs) and our UK Consumer Advocacy Hub, where - in both sets of meetings - other stakeholders can also benefit from the CCNI's consumer insights.

Details of the outputs of our **National Hubs** can be found on a dedicated page of the Panel's website: <https://www.communicationsconsumerpanel.org.uk/stakeholder-engagement/the-panels-national-hubs>

We have been grateful for CCNI's commitment to partnership working and in particular during the last year, for sharing research data on postal services in Northern Ireland.

We value the CCNI's robust research and will continue to share insights in order to add value and strengthen the consumer voice from all Nations and Regions of the UK. The diagram below highlights aspects of the Panel's work to strengthen the consumer voice across the UK, enhanced by greater engagement with stakeholders and the sharing of evidence and insights. The CCNI's input can be seen in many of these areas:



Fairness to all consumers across the UK communications sectors

Central to the Panel's work is highlighting the interests of people who may not always be heard by the communications industry, or in regulation. We work with consumer bodies, industry, Ofcom, the UK and Devolved Governments and other policy and industry stakeholders to understand how those interests may best be served, in both the short and the longer term.

The Panel firmly believes that fairness should mean that NI consumers are not charged more to send parcels and post than other UK consumers, nor excluded from the market.

Parcel surcharging is already making it more expensive for consumers and micro businesses in Northern Ireland to shop and do business; it is vital that they are not further disadvantaged. Additionally, they must be protected from the possibility of some businesses outside of Northern Ireland ceasing delivery of goods to consumers in Northern Ireland.

We are currently undertaking qualitative research on the experience of postal users in the parcel market and we have included a boosted sample size for NI to establish any issues that may arise from the impact of the NI protocol on consumers.

We look forward to continued collaboration with the CCNI directly and as participants at our NI Hub as we work to ensure postal services consumers are treated fairly.

Digitalisation

The CCNI's choice of "Digitalisation" as a strategic priority is particularly relevant for the rapidly changing context in telecoms.

We are grateful for all the CCNI's collaboration over the last year in helping us work towards ensuring that consumers in all Nations and Regions of the UK, including NI have access to decent, reliable, secure and resilient broadband that is affordable.

Connectivity needs to keep pace with both the needs of consumers and micro businesses - and the demands placed upon them by the UK Government's 'Digital by Default' approach. We believe that for Digital by Default to work, an inclusive core principle of 'Access by Default' must also be followed.

The broadband USO, the shared rural network and migration to all-internet telephony networks are wide-reaching initiatives that will affect consumers across the UK. However, no consumer is identical to another and consumers' digital needs will vary depending on factors such as the size of a household or whether the consumer is a small business.

The options on offer to consumers and micro businesses need to accord with the purpose for which the connectivity will be used and the geographical part of the UK where the consumer is living. Access to information and education about these options is key in delivering fairness to consumers and micro businesses and in protecting them from scams and fraudulent activity. We have shared with CCNI [our recent research into scams and fraudulent activity across communications networks](#) and will continue to work closely to protect NI consumers from these pernicious activities.

In terms of digitalisation, we believe the migration to all internet telephony across the UK over the next 5 years will create challenges for many consumers and microbusinesses. We will continue our engagement with CCNI as we seek to mitigate detriment caused by this major shift in technology. Alongside the risk of consumers' additional telephony services being cut off by the change, we are keen that no consumer falls foul of scammers claiming to be part of the switching programme. We also want to ensure that consumers do not

bear cost of the network upgrade, either in increased prices, upselling, or in paying for changes to their home set-up to accommodate new equipment (such as the need to move the master socket).

We have commissioned research to help fill a knowledge gap regarding the needs of consumers and micro businesses and will share our findings with the CCNI - communication and education will be key; we have encouraged UK Government to ensure that any communications programme is conducted in collaboration with consumer advocates from across the UK.

Summary

We support the CCNI's four strategic aims. We look forward to continuing to work together with CCNI to ensure that the needs of consumers in Northern Ireland are listened to and responded to by policy-makers and industry stakeholders across the UK, at this time of Covid 19, EU Exit and beyond.