



Still Going Round in Circles: Complaints handling in telecoms

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1 Executive Summary

Communications services play a fundamental role in people's lives and are vital to UK businesses. This research revisits consumers' experiences when they face a problem with their communications service.

"I felt that they weren't listening. It was like they had a spreadsheet in front of them to deal with each issue. And unless that issue was in front of them, they didn't know how to resolve it."

Donald, 64, pay-TV, very low income, Glasgow

1.1 Background

Donald's comment above sums up a typical experience for many consumers trying to get a problem resolved with their communications provider. This issue is not new - in 2013, the Panel published its report '[Going round in circles? The consumer experience of dealing with problems with communications services](#)' which found that some consumers' experiences were so poor that they would suffer in silence or 'get by' on a sub-standard service. For some who did contact their provider, the issue was exacerbated by a negative contact experience and providers often failed to acknowledge the significant effort required or the time and/or money lost to seek resolution. For many consumers, the escalation of the problem was often ineffective, and communications providers (CPs) were poor at signposting consumers to the appropriate Alternative Dispute Resolution (ADR) scheme.

We pushed both Ofcom and CPs to improve their performance in this area and it remains something that we monitor closely. Ofcom opened an Enforcement Programme into complaints handling in 2013 and now actively monitors CPs' compliance with complaints handling rules, including access to ADR and customer service more generally.

Ofcom subsequently investigated and fined three communications providers for not complying with complaints handling rules including a £1 million fine for EE, £925K for Vodafone and £250K for H3G (Three).

Following our earlier work in this area, we wanted to revisit CPs handling of complaints to see what progress had been made and where improvements were still needed. We were particularly interested to understand how people were using ADR and to assess if complaint handling processes were accessible to all consumers, particularly people in vulnerable circumstances.

The Panel commissioned Futuresight to undertake in-depth, qualitative interviews with 74 consumers. We particularly wanted to understand the experiences of people in more vulnerable circumstances, as well as disabled people, older people and those running micro businesses.

1.2 Still suffering in silence

In our research, consumers suffered more from partial or total loss of their landline or broadband fixed line services compared to pay TV or mobile service issues. The research found that some consumers had continued to struggle with ongoing problems without pursuing them further with their provider, often due to their previous experience with the company. Not having the technical know-how or confidence to fix a service problem, they had persevered with little or no service, until the need to access the service became so acute that they felt that contacting their CP again was the only option. For these participants, there was an anxiety that, due to the technical nature of their service and their past experiences of having raised the issue, their problem would not be understood by their CP. They were also concerned that they would not understand what the CP might tell them to do.

Procedural barriers put in place by the provider can also present a challenge for consumers, with disabled people and people in vulnerable circumstances disproportionately affected. For disabled people, contacting a call centre may be difficult e.g. using the key pad to select options during a call, as highlighted in our 2015 research, [*Inclusive Communications: We're not all the Same!*](#) The research also found that scripted answers, jargon, unclear questions and language and cultural variances could further complicate matters. Waiting on hold for a significant time in queues can also deter consumers from making contact, meaning they continue to suffer in silence. However all these areas are within the control of the CP.

*"I call it a box. The man on the phone called it a router.
I had no idea what he was referring to."
Caroline, 57, broadband, vulnerable, Manchester*

For those consumers who did persevere in trying to contact their provider, there were two main issues: getting through at all and getting their problem escalated within the CP's internal structure. Two participants said they had made more than 50 calls and many had made 20 calls.

Some consumers give up after making an initial contact because of being repeatedly passed to different agents or departments. There is a broader issue of providers not recording notes about the problem the consumer is describing. Some in the sample were frustrated at having to start at square one every time they spoke to their provider. However, some consumers never got to this stage as providers did not fulfil promises to call them back. This can exacerbate a consumer's belief that their problems are unimportant to the provider, no matter what effort is made to explain the difficulty.

"I felt like I was belittled... they keep on asking the same questions. It's always the same and you've already tried that even before you've made the phone call. It's common sense that you would unplug it and try again. So, you feel very stupid and very irritated...it's their attitude. You're just a number."

Angela, 37, broadband, very low income, Bristol (case study 8)

1.3 Consumers in vulnerable circumstances

Visibly shaking: *"It all went down, and by that time, I was feeling very, very anxious. All the nerve endings on my back were tingling. I had a knot in my stomach, and I wasn't coping at all well. I went into meltdown really. So, I gave up with it all, and just abandoned it."*

Margaret, 65, broadband, mental health problems, Manchester (case study 7)

Many participants in a vulnerable, or potentially vulnerable situation demonstrated a lack of confidence in relation to the technology and the terminology involved. This was compounded by a perceived unwillingness on the part of call centre agents to speak in plain English, go beyond their script, or actively listen to the consumer. Overseas call centres were associated with some of the language barriers experienced by participants in this group. Issues with language could exacerbate an underlying anxiety about the initial technical problem. These factors could lead to consumers in this group hesitating and delaying contact with their provider.

On occasion, financial vulnerability contributed to greater assertiveness and perseverance. However, some people on very low incomes coped less well, sometimes experiencing intense anxiety and helplessness.

1.4 More flexibility needed in CPs' processes

"[The websites] are really bad. Hard to find things. They aren't designed with disabled people in mind. I will make a call instead, but then, I prefer calling anyway. It's easier to talk to someone to get answers."

John, 37, mobile, London, visual impairment

One significant issue mentioned in the research was the cost of engineer visits; consumers can be put off from pursuing resolution if they fear having to cover the cost of an engineer. Our 2015 research *'We're Not All the Same'* highlighted the significant role that communications services played in the lives of the disabled people interviewed. In our view, people whose accessibility or communications needs differ from the mainstream should receive the support they need on an equivalent basis. That means, for example, that if someone is unable to reach behind devices to unplug them and the alternative is for an engineer to assist, they should be offered an engineer call-out at no cost.

Our 2018 research found that CPs continue to have significant room for improvement, not only in the flexibility of their processes, but in understanding and empathising with consumers, as highlighted by Mabel:

"It made me feel stupid when they said, "can you phone back when there is somebody else there?" I was quite capable of understanding what he was asking me to do. What I was trying to say to him was that I wasn't physically able to do it. I felt that he could have been more understanding."

Mabel, 65, broadband, dexterity impairment, Glasgow (case study 10)

1.5 Consumers had a low propensity to make formal complaints

*"Pointless, it would drag it out even more.
And there's all the rigmarole of writing it down, keeping notes."
Mohammed, 45, dual play, Bristol*

Very few people in the sample made a formal complaint - they just wanted the problem fixed. When a formal complaint is made, feelings about its effectiveness are mixed. At best, registering a formal complaint is seen to have a positive impact as it serves to speed a resolution. At worst, formal complaints have little or no impact on the provider's urgency to resolve the issue.

1.6 ADR experiences were mixed

*"When I think of 'Ombudsman', I think of finance."
Stephanie, 36, triple play, Belfast*

*"I have no idea where else to go."
David, 43, broadband, Manchester*

There is limited knowledge of ADR schemes or other third parties. Awareness of ADR schemes is found in consumers who are more technically literate, assertive, and have the confidence to pursue resolution of their telecoms issues. When asked, participants found the eight-week period unfit for purpose; this was too long to wait before filing a complaint. In the view of most ADR users in the sample, signposting to the appropriate ADR scheme was lacking: both websites and call centre agents lacked the right information. In addition, there was little evidence in the sample that providers automatically issue eight-week letters to participants, informing them of their right to submit a case to ADR.

*"Eight weeks? I'm not going to wait for that long."
Matt, 38, sole-trader, mobile, Manchester*

*"Never heard of it [deadlock letter] and I've not been sent one."
Jo, 24, broadband, Belfast*

Clearly in our sample, usage of ADR schemes was limited because of a lack of awareness. The communications sector has an added complication because the two schemes exist and it may not be clear to consumers which providers are covered by which scheme and signposting between the two schemes may also be unclear. There is undue reliance on individual consumers knowing about ADR Schemes, finding them, and, if having approached the wrong ADR scheme, finding the other provider.

1.7 International comparisons

International comparisons are useful. The need for a deadlock letter is peculiar to the UK situation when compared to France, Germany, USA, and Australia. Nor do any of these countries have two ADR schemes for communications services, as the UK does. The experience of those surveyed for this report suggests that there is a long way to come for ADR schemes in terms of quick accessibility to independent help in resolving a complaint.

1.8 Recommendations

Based on Futuresight's research, the Panel makes the following recommendations:

Set higher standards of care for all consumers in the communications sector and increase transparency in what they can expect from CPs

Providers should publish a consumer charter so that consumers know what they can expect from their providers and ensure that the complaints process and contact details are one-click from their home page.

Improve communications providers contacts with consumers; difficult conversations impact consumers who are already vulnerable

CPs should enable their call centre agents to have better conversations with all consumers. Contact centre agents should be familiarised with people's way of expressing their technical difficulties, trained to listen actively and to use jargon-free language;

CPs should have specialist agents with the skills to handle the various needs and requests from vulnerable consumers and micro businesses in UK and overseas contact centres;

CPs should share good practise to help raise levels of service across the industry;

CPs should offer appropriate means of contact for all consumers, thereby removing barriers to complaining;

CPs should provide effective support to contact centre employees who deal with frustrated consumers.

More support is needed by people in vulnerable circumstances and micro businesses when a problem occurs

CPs should better signpost their priority service registers, making all consumers aware of the registers;

CPs' call-out prices for an engineer should be clear and easy to find, including guidance on situations where a call-out fee may be charged;

Call-out costs should be free for consumers who are physically unable to assist in routine diagnostic checks;

CPs should feature specific support and advice for micro business consumers in a user-friendly format;

Ofcom, the Panel, and providers should facilitate the sharing of good practice in supporting consumers in vulnerable circumstances and micro businesses.

Increase the awareness and efficacy of ADR schemes in the telecoms sectors

CPs should improve the prominence of their ADR scheme online and in written communications to consumers, for example, considering dual-branding of complaint letters;

CPs should train their contact centre agents about ADR schemes to help them inform consumers;

Ofcom should research the correlations between ADR awareness/prominence and overall satisfaction of customer service;

Ofcom should reduce the referral period to an ADR scheme, from eight weeks to a maximum of 28 days, with the capacity for shorter bespoke timescales in special circumstances.

2. Context

In 2013, the Panel published its report '[Going round in circles? The consumer experience of dealing with problems with communications services](#)' which found that some consumers' experiences were so poor that they would suffer in silence or 'get by' on a sub-standard service. For some who did contact their provider, the issue was exacerbated by a negative contact experience and providers often failed to acknowledge the significant effort required or the time and/or money lost to seek resolution. For many consumers, the escalation of the problem was often ineffective, and communications providers (CPs) were poor at signposting consumers to the appropriate Alternative Dispute Resolution (ADR) scheme.

As a result of our 2013 research and noting the findings of [GfK's study for Ofcom on ADR](#) the same year, the Panel pushed both Ofcom and CPs to improve their performance in this area and it remains something that we monitor closely. Ofcom opened an Enforcement Programme into complaints handling in 2013 and now actively monitors CPs' compliance with complaints handling rules, including access to ADR and customer service more generally. Ofcom's then Chair, Dame Patricia Hodgson noted *"I am grateful for the work you have done to improve the understanding of customer service problems in the telecoms sector. Your 'Going Round in Circles' research provided powerful insights and has been useful to the team here working on GC9¹ enforcement and policy. We will continue our own research on the quality of customer service and also on improvements in industry and ADR."*

Recommendations from the *Going Round in Circles* report also directed attention towards following guidelines for handling contact with disabled consumers fairly, and making available a variety of modes of contact such as email, text phone, and text or video relay services, to facilitate equivalent and inclusive methods of contact. We advocate treating all consumers fairly; improving processes such as maintaining better records and facilitating good communication with CPs improves outcomes for all consumers.

We investigated further into the issue of inadequate customer service and solutions for disabled people in our 2015 research, [Inclusive Communications: We're not all the Same!](#) We shared our findings and recommendations with stakeholders across the UK and, having done so, input further recommendations into Ofcom's good practice guide for CPs, for promoting services for disabled consumers.

Mott Macdonald's 2015 research, commissioned by Ofcom, into the industry's signposting of consumers to ADR gave the Panel further cause for concern; in only 2% of 897 cases analysed, was the written notification sent by the required eight-week deadline. CPs were found to have 'resolved' cases without clear justification. Broadly, this research, published in 2015, found that CPs' complaints handling inhibited consumers from getting the help they ought to receive, ultimately preventing the resolution of consumers' issues. The Panel pushed Ofcom to take further action.

Since this work, the number of letters advising consumers of their right to access ADR at eight weeks has increased, but we remain of the strong belief that forcing consumers to wait eight weeks if a deadlock letter has not been issued is still unacceptable. In a digital age, a delay

¹ Compliance with the requirements under General Condition 9 relating to contracts between CPs and consumers and fairness of related contract terms

of this length is simply unacceptable, and we continue to call for the shortening of the eight-week referral period. We also believe that information about the complaints handled by the ADR Schemes should be made public and that there should be greater publicity of ADR.

Ofcom subsequently investigated and fined three communications providers for not complying with complaints handling rules including a £1 million fine for EE, £925K for Vodafone and £250K for H3G (Three).

3. Research: methodology

The Panel commissioned this qualitative research that brought out the experiences, feelings, and needs of a particular sample of consumers. Participants were selected if they had experienced a problem with their communications within the last year and had failed to resolve the problem on the first contact with their provider. 74 people were in the total sample interviewed by Futuresight. Of the total 74, ten were sole traders or owners of micro businesses. The sample had participants of all ages, from 18 upwards. Nearly half of the sample had eventually resolved their issue; the rest had either given up on resolution or were still pursuing resolution.

The sample had a strong focus on certain groups:

- those with circumstantial vulnerability (e.g. bereavement, illness);
- the elderly;
- disabled people (with and without financial vulnerability);
- people with very low income (and/or financial vulnerability); and
- and people with no specific need.

The sample represented the four UK nations and a variety of localities: urban, rural, and semi-rural. A range of communications services were represented across the sample: mobile, landline, broadband, and pay TV.

In-depth research into each person's experiences provides rich information, and food for thought. The research was not intended to test the statistical significance of various factors and the outcomes of their consumer journey. It is important to note the complexity and uniqueness of each person's situation. Differences and similarities can be seen between and within the groups in the sample. This is significant because it not only suggests that broad labelling of certain groups, without meaningful detail, is unhelpful; but it also supports the idea that building inclusivity into the core of, say, customer service, website design, and complaints handling is the optimal approach for all consumers.

The full report prepared by Futuresight for the Panel contains greater detail and depth in all the areas covered in this report, including desk research into complaints handling and ADR, with an international look at ADR schemes.

4. Research: key findings

4.1 Barriers prevent and deter consumers from contacting their provider

"[The websites] are really bad. Hard to find things. They aren't designed with disabled people in mind. I will make a call instead, but then, I prefer calling anyway. It's easier to talk to someone to get answers."

John, 37, mobile, London, visual impairment

Procedural barriers put in place by the provider can also present a challenge for consumers. For disabled people, contacting a call centre may be difficult e.g. using the key pad to select IVR options during a call, as noted in *We're Not All the Same!*. Scripted answers, unclear questions and language and cultural variances can all further complicate matters. Waiting on hold for a significant time in queues can also deter consumers from making contact, meaning they continue to suffer in silence. However, all these areas are within the control of the CP.

For those consumers who did persevere in trying to contact their provider, there were two main issues: getting through at all and getting their problem escalated within the CP's internal structure. Two participants said they had made more than 50 calls and many had made 20 calls.

Some consumers give up after making an initial contact because of being repeatedly passed to different agents or departments. There is a broader issue of providers not recording notes about the problem the consumer is describing. Some in the sample were frustrated at having to start at square one every time they spoke to their provider. However, some consumers never got to this stage as providers did not fulfil promises to call them back. This can exacerbate a consumer's belief that their problems are unimportant to the provider, no matter what effort is made to explain the difficulty.

4.2 Fixed line services feature the most serious and intractable problems

"[The provider] said there was no fault from their end. So, what could I do? It was going to cost me £125 for an engineer. No way!"

Andy, 37, broadband, London

In our research, consumers suffered more from partial or total loss of their landline or broadband fixed line services compared to pay TV or mobile service issues. One significant issue is the cost of engineer visits; consumers can be put off from pursuing resolution if they fear having to cover the cost of an engineer. Our research suggests that on occasions the cost is unfairly passed to the consumer; the responsibility to cover the cost is not clearly communicated; and a refund of the (not insignificant) cost comes weeks after the consumer has initially paid. Some disabled consumers - particularly people who are unable to see, hear, recall sequences of information, or move or access equipment easily - may find it difficult to diagnose the issue in their home; this leads to the extension of the loss of service.

4.3 Harm experienced by consumers varied in nature and severity

"I need my landline. I couldn't do without that. My alarm system is tied to that phone. It's connected to the smoke alarms. That's a big worry."

Cynthia, 74, landline, mobility and dexterity impairment (case study 2)

Amongst the people we interviewed, there was a range of harm resulting from loss of service issues:

- personal risk from the loss of access to emergency services, alarm receiving centres, health monitoring services or one's next of kin;
- monetary loss and hardship;
- business losses, both financial and reputational;
- loss of time and resilience from working to resolve the problems;
- domestic disharmony; and
- exclusion from contact with people and services.

These types of harm have a greater impact on vulnerable people or those in micro businesses because their situations expose them to greater risk. There is often little choice of alternative options for those who experience a problem if they are already vulnerable or at risk.

4.4 People in (potentially) vulnerable circumstances require greater support to protect them from harm

"It made me feel stupid when they said, 'can you phone back when there is somebody else there'. I was quite capable of understanding what he was asking me to do. What I was trying to say to him was that I was that I wasn't physically able to do it. I felt that he could have been more understanding."

Mabel, 65, broadband, dexterity impairment, Glasgow (case study 10)

People who took part in the research who were in vulnerable situations tended to demonstrate lower literacy and less confidence, combined with a greater propensity to feel disempowered to handle the complaints process. These consumers were more likely to suffer harm, and when they did, did so for longer periods, than those who were more motivated to complain and could pursue resolution effectively.

Visibly shaking: *"It all went down, and by that time, I was feeling very, very anxious. All the nerve endings on my back were tingling. I had a knot in my stomach, and I wasn't coping at all well. I went into meltdown really. So, I gave up with it all, and just abandoned it."*

Margaret, 65, broadband, mental health problems, Manchester (case study 7)

Although confidence, literacy, and empowerment varied across the sample of people we spoke to, many disabled consumers required specific support in order to ensure effective problem handling. Some disabled people in the research spoke of being unable to physically interact with their telecoms equipment such as their router; others stated that they could not even easily contact their provider to complain.

4.5 Micro businesses can suffer harm because of their reliance on communications services. Whilst some are confident and technically literate, this does not always prevent significant harm

"We need [broadband] to do the admin.

But I don't think there's anything we can do. We just have to let [our provider] sort it out.

I think they'll do it in their own time, not when we want it."

Terry, 63, broadband, micro-business owner, Glasgow

Some micro businesses are run by confident, literate, and empowered consumers. These consumers may be able to arrange workarounds, using alternative communications services, but when this is not the case, we found that people's livelihoods can be significantly impacted.

4.6 Better outcomes are reported by the more confident and technically literate, while many people in a vulnerable situation avoided technical language and issues

"It took me a bit of pushing, but in the end, I spoke to someone in the technical department and they were really helpful."

Tim, 32, mobile, South Wales

"I call it a box. The man on the phone called it a router.

I had no idea what he was referring to."

Caroline, 57, broadband, vulnerable, Manchester

Across the sample, most people felt that the onus was on them to pursue their complaint and achieve resolution, rather than their CP taking it forward. With this expectation, some consumers were disinclined to pursue the complaint if they were anxious about having to be tenacious about pursuing their problem.

As we note above, many participants in a vulnerable, or potentially vulnerable situation demonstrated a lack of confidence in relation to the technology and the terminology involved. This was compounded by a perceived unwillingness on the part of call centre agents to speak in plain English, go beyond their script, or actively listen to the consumer. Overseas call centres were associated with some of the language barriers experienced by participants in this group. Issues with language could exacerbate an underlying anxiety about the initial technical problem. These factors could lead to consumers in this group hesitating and delaying contact with their provider.

On occasion, financial vulnerability contributed to greater assertiveness and perseverance. However, this did not lead to a more effective process or faster resolution. However, some people on very low incomes coped less well, sometimes suffering intense anxiety and helplessness. Many on very low incomes stated that the technical nature of the problems put them off seeking help or guidance from elsewhere.

Vulnerability was seen, in the sample, to emerge from a variety of factors such as isolation, technical literacy, and financial security. Many consumers in more vulnerable circumstances

or who were potentially vulnerable had limited digital skills and were less able to draw on the support of friends or family.

4.7 Consumers had a low propensity to make a formal complaint

*"Pointless, it would drag it all out even more.
And there's all the rigmarole of writing it down, keeping notes."
Mohammed, 45, dual play, Bristol*

Typically, consumers contacted their provider to notify them about a problem they needed fixed; very few in the sample call their provider to make a formal complaint. When a formal complaint is made, feelings about its effectiveness are mixed. At best, registering a formal complaint is seen to have a positive impact as it serves to speed a resolution. Some found that it helps to contact senior employees at their provider (sometimes leading to a single point of contact on the problem). At worst, formal complaints have little or no impact on the provider's urgency to resolve the issue.

4.8 Generally, awareness of ADR schemes is low, and experiences of ADR is mixed

*"When I think of 'Ombudsman', I think of finance."
Stephanie, 36, triple play, Belfast*

*"I have no idea where else to go."
David, 43, broadband, Manchester*

There is limited knowledge of ADR schemes or other third parties. Awareness of ADR schemes is found in consumers who are more technically literate, assertive, and have the confidence to pursue resolution of their telecoms issues. When asked, participants found the eight-week period unfit for purpose; this was too long to wait before filing a complaint. Signposting to the appropriate ADR scheme was lacking, in the view of most ADR users in the sample: both websites and call centre agents lacked the right information. In addition, there is little evidence that providers automatically issue eight-week letters to participants, informing them of their right to submit a case to ADR.

*"Eight weeks? I'm not going to wait for that long."
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*"Never heard of it [deadlock letter] and I've not been sent one."
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A variety of reports on ADR schemes, mentioned in the full report by Futuresight, have found that the ADR landscape is complicated; consumers don't have awareness of the schemes; and that the process is lengthy. Even if consumers found ADR schemes effective and the process

manageable, if consumers do not know about them, or which one of the two in the communications sector to go to, then consumers lack a valuable resource.

Clearly in this research, usage of ADR schemes was limited because of a lack of awareness. The communications sector has an added complication because the two schemes do not make clear which providers are covered and do not make clear reference to each other. There is undue reliance on individual consumers knowing about ADR Schemes, finding them, and, if having approached the wrong ADR scheme, finding the other provider.

International comparisons are useful. The need for a deadlock letter is peculiar to the UK situation when compared to France, Germany, USA, and Australia. Nor do any of these countries have two ADR schemes for communications services, as the UK does. The experience of those surveyed for this report suggests that there is a long way to come for ADR schemes to have sufficient impact to resolve consumers' issues.

5. Recommendations

Based on Futuresight's research, the Panel makes the following recommendations:

Set higher standards of care for all consumers in the communications sector and increase transparency in what they can expect from CPs

Providers should publish a consumer charter so that consumers know what they can expect from their providers and ensure that the complaints process and contact details are one-click from their home page.

Improve communications providers contacts with consumers; difficult conversations impact consumers who are already vulnerable

CPs should enable their call centre agents to have better conversations with all consumers. Contact centre agents should be familiarised with people's way of expressing their technical difficulties, trained to listen actively and to use jargon-free language;

CPs should have specialist agents with the skills to handle the various needs and requests from vulnerable consumers and micro businesses in UK and overseas contact centres;

CPs should share good practise to help raise levels of service across the industry;

CPs should offer appropriate means of contact for all consumers, thereby removing barriers to complaining;

CPs should provide effective support to contact centre employees who deal with frustrated consumers.

More support is needed by people in vulnerable circumstances and micro businesses when a problem occurs

CPs should better signpost their priority service registers, making all consumers aware of the registers;

CPs' call-out prices for an engineer should be clear and easy to find, including guidance on situations where a call-out fee may be charged;

Call-out costs should be free for consumers who are physically unable to assist in routine diagnostic checks;

CPs should feature specific support and advice for micro business consumers in a user-friendly format;

Ofcom, the Panel, and providers should facilitate the sharing of good practice in supporting consumers in vulnerable circumstances and micro businesses.

Increase the awareness and efficacy of ADR schemes in the telecoms sectors

CPs should improve the prominence of their ADR scheme online and in written communications to consumers, for example, considering dual-branding of complaint letters;

CPs should train their contact centre agents about ADR schemes to help them inform consumers;

Ofcom should research the correlations between ADR awareness/prominence and overall satisfaction of customer service;

Ofcom should reduce the referral period to an ADR scheme, from eight weeks to a maximum of 28 days, with the capacity for shorter bespoke timescales in special circumstances.