

COMMUNICATIONS  
CONSUMER  
PANEL



# Communications Consumer Panel and Advisory Committee for Older and Disabled people priorities and Work Plan 2014/15

## Introduction

This is the 2014/15 Work Plan for the Communications Consumer Panel and Ofcom's Advisory Committee for Older and Disabled people (ACOD). It sets out our priorities for the coming year.

The limit of the Panel's resources - both financial and the executive team - directly impact upon the extent of its work so there is a need to focus on key areas of consumer interest. Accordingly, the Plan strives to encompass and prioritise those issues most likely to impact significantly upon consumers, citizens and micro-businesses in the communications sector, including postal services. At the same time it seeks to enable effective monitoring of a broader range of topics so that the Panel and ACOD can react flexibly to emerging areas.

This Plan was put out for consultation in February and March 2014 and was reviewed following comments made by stakeholders. The Work Plan explains the Panel's and ACOD's roles, describes the different ways in which we engage with issues, explains how we chose our priorities for the coming year and sets out the issues that we propose to address.

## Role

The Communications Consumer Panel is an independent panel set up under the Communications Act 2003. The Panel pays particular attention to the needs of: more

vulnerable people; older people and people with disabilities; the needs of people in rural and urban areas; people on low incomes; and micro-businesses, which face many of the same issues as individual consumers.

The Panel has eight members who between them have experience in many different fields, including advocacy, dispute resolution, the telecoms, digital and content industries, access services, micro and small business, the third sector, social policy and market research. There are four members of the Panel who represent the interests of consumers in England, Northern Ireland, Scotland and Wales respectively. They liaise with the key stakeholders in the Nations to understand the perspectives of consumers and citizens in all parts of the UK and input these perspectives to the Panel's consideration of issues. These Members also attend meetings of the Ofcom Advisory Committee for each Nation and seek to ensure a two-way communication of ideas.

To take advantage of the synergy between the Panel and ACOD and to avoid potential duplication, cross-membership of the two bodies was established in Summer 2012. The remits of the bodies remain unchanged. This means that Members, in their ACOD capacity, also provide advice to Ofcom on issues relating to older and disabled people including television, radio and other content on services regulated by Ofcom.

The Panel and ACOD engage with stakeholders to help inform the advice that they give to Ofcom and to keep the interests of consumers, citizens and micro-businesses on the agenda across the sector. We also engage with a range of other organisations working on behalf of these constituencies - including those representing older and disabled people.

The Panel is often described as a 'critical friend' to Ofcom. We provide robust and independent advice that is constructive, realistic and cognisant of the trade-offs which regulatory decisions often involve. This is made possible by the fact that Ofcom shares information and ideas with the Panel early in the regulatory process before consulting formally with other stakeholders. We publish information about our advice and activities on our own website <http://www.communicationsconsumerpanel.org.uk>

## The Panel's objective

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, Government, industry and others.*

## Context

Given our role to influence Ofcom, it is vital that we take into account the work to be undertaken by Ofcom in the coming year, as well as wider developments in the area of communications. Our Work Plan is therefore informed by Ofcom's priorities and workstreams, as outlined in its draft Annual Plan<sup>1</sup>, in addition to other significant developments which will affect consumers, citizens and micro-businesses in the UK.

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<sup>1</sup> <http://stakeholders.ofcom.org.uk/consultations/draft-annual-plan-2014-15/>

We will remain alert to issues that may arise during the course of the year; and for many of the areas that we have identified there are specific dimensions arising from the devolved Nations. Our work with the Advisory Committees and other stakeholders in the Nations will inform our approach to these matters. Additionally, we will undertake close co-operation and explore joint working with other consumer-focussed organisations on a range of issues that relate to the topics listed on page 4, or that arise during the year.

## Wider developments

In addition to Ofcom's Plan for the year there are a number of other developments underway or anticipated during 2014/15, which are relevant to consumers, citizens and micro-businesses in the UK. These include:

- The changing consumer landscape;
- The implementation of the Consumer Rights Directive and the Consumer Rights Bill;
- Anticipated European Commission initiatives e.g. regulatory proposals for a Connected Continent, in addition to those for an Online Dispute Resolution platform, linked to the implementation of the ADR Directive
- The Government's Telecoms Consumer Action Plan

Over the past year there have been fundamental changes within the consumer landscape as Citizens Advice and Citizens Advice Scotland take on responsibilities and some resources from the Office for Fair Trading (OFT) and Consumer Focus.

## Priorities for 2014/15

We have developed our Work Plan by applying two questions to each issue that it might address:

- What is the scale of the issue for consumers, citizens and micro-businesses?
- Can the Panel and ACOD make a difference?

## Types of engagement

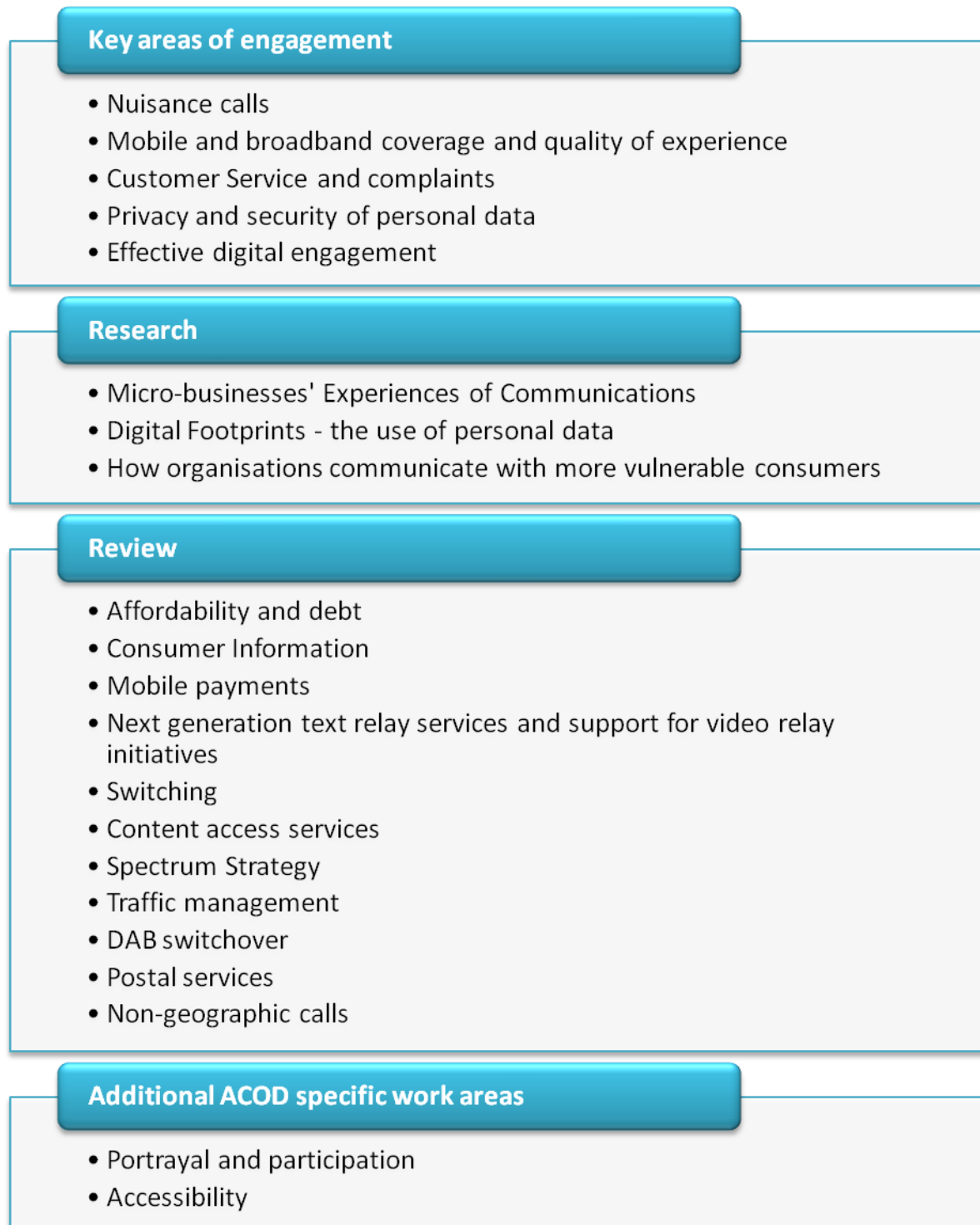
We organise our work by focusing our ongoing effort on areas of key engagement, using research to inform our work and keeping a wider range of topics under ongoing review. In relation to other issues, we will review them as appropriate and provide advice as necessary.

The fast changing communications environment means that we must also build flexibility into our plans in order to be responsive to new challenges. We may receive requests for advice in relation to issues that are not in our Work Plan, and the Panel itself is likely to identify new issues which are of importance to consumers and which warrant its attention.

We will continue to monitor issues in the communications field and liaise with a wide range of organisations representing the interests of consumers to gather - and share - intelligence about developments.

Our proposed work areas are set out below.

Figure 1: Work areas 2014/15



## Key Areas of Engagement:

### **Nuisance calls and texts**

Nuisance calls - including live marketing calls, silent calls, abandoned calls, and recorded marketing message calls - and texts from businesses can cause consumers irritation, anxiety and distress. There is also a risk that they adversely affect people's likelihood of engaging with commercial services by phone, which in turn could mean lost business for some firms. A reduction in people's trust in their communications service is bad both for consumers and businesses.

#### **Specific Objective**

To help reduce both the incidence and the impact of nuisance calls and texts including silent calls and unrequested marketing calls and texts, the Panel will continue to work with Government, Ofcom, TPS, the ICO, the Direct Marketing Association (DMA), industry and other consumer groups to encourage: co-operative efforts between agencies; effective use of the available technology; a review of issues relating to consumer consent; and support for consumers wishing to report nuisance calls - so that consumers are well informed and better protected.

### **Mobile and broadband coverage and quality of experience**

In the Panel's view, sub-optimal delivery of communications services as a result of inadequate infrastructure - be it a lack of fast broadband or the absence of mobile voice and/or data coverage - has long since ceased to be a matter of simple irritation for consumers and micro-businesses, and is now an issue of real detriment. The Panel has welcomed the 4G coverage obligation of 98% indoor coverage UK wide, and 95% in each Nation by the end of 2017, and the mobile infrastructure project as tools to increase rural broadband and mobile voice/data coverage. We have encouraged close monitoring of their rollout. However there is still some way to go.

Consumers, citizens and micro-businesses are increasingly reliant on mobile devices. Excellent network coverage and call quality combined with the provision of better information will help people make better choices - and make greater use of the functions and applications that they want, which in turn we believe will drive up service levels and ensure that a thriving competitive market benefits all stakeholders. In particular, consumers and citizens in the widest sense should not be left behind, left out or left wanting.

#### **Specific objective**

To help ensure that the needs of consumers and citizens are central to policy making, that delivery of a high quality service experience is consistently achieved and that consumers and citizens are not excluded from effectively participating in the digital world, we will continue to engage with Government, Ofcom, BDUK and industry so that consumer and

citizen interests are taken into account in relation to both the provision of infrastructure and quality of experience.

### Customer Service and complaints

The Panel continues to highlight the customer service recommendations it made following its 2013 research *Going round in circles? The consumer experience of dealing with problems with communications services*<sup>2</sup>.

Following the issues highlighted by the research, and our own subsequent exploration of the topic, the Panel has made recommendations in five key areas:

- the quality of information provided to consumers
- contact centre staff training should be reviewed and strengthened
- the consumer contact experience should be improved
- greater support should be provided for older and disabled consumers
- escalation and ADR referral processes should be reviewed and strengthened

You can read about the report and the Panel's detailed recommendations on the Panel's website<sup>3</sup>.

### Specific Objective

The Panel will continue to urge the communications industry to raise the level of customer service it offers so that consumers enjoy better holistic standards. We are discussing the research, findings and recommendations with communications providers and Ofcom and will review what progress has been made later in the year. We will pay particular attention to the needs of disabled people with specific communication needs and other vulnerable consumers.

### Privacy and security of personal data

The range of opportunities offered by the internet, mobile apps and micropayments provide consumers and citizens with a host of potential benefits. The Panel's 2011 research *Online Personal Data - the Consumer Perspective*<sup>4</sup> suggested that few consumers have top-of-mind concerns in this area, although they express significant concern when asked about specific privacy issues. However with machine-to-machine data exchange on the horizon, and as the market for personal data becomes ever more complex and monetised, it is increasingly important that people understand the implications of the consent they are giving organisations for the use of their data and with regard to security, the precautions they can take.

<sup>2</sup> <http://www.communicationsconsumerpanel.org.uk/downloads/going-round-in-circles.pdf>

<sup>3</sup> <http://www.communicationsconsumerpanel.org.uk/going-round-in-circles/going-round-in-circles>

<sup>4</sup> <http://www.communicationsconsumerpanel.org.uk/online-personal-data/online-personal-data-1>

### **Specific Objective**

To represent consumers' and citizens' interests so that they can be as well informed and protected as possible, the Panel will build on its research to identify and highlight the issues, draw attention to the need for further work, and encourage government and the EU to ensure that consumer and citizen views and experiences are at the heart of policy making and regulation in this area.

### **Effective digital engagement**

It remains the Panel's belief that unless fundamental action is taken, the digital divide risks becoming an ever greater digital gulf as the distance increases between those who are online and those who remain firmly anchored in the offline world. We live in an era in which we are seeing many Government services become "digital by default" and when being online is becoming more and more a necessity of life and less and less of an optional extra.

While the advantages of online connectivity apply to all groups in the community, they are especially relevant to disabled people, those on a low income and older people, many of whom may be less mobile than younger people. And yet we know that the take-up of the digital world is unequal amongst the population, with older people more likely to be excluded.

Building on the *Consumer Framework*<sup>5</sup> that we published in 2010 and informed by our 2012 *Bridging the Gap: Sustaining Online Engagement*<sup>6</sup> research, the Panel has identified a number of areas for strategic focus and made a series of recommendations for government, policy makers and those delivering on the ground. Whilst solutions may be complex, the issue itself is straightforward: approximately 21% of the UK population lack basic digital literacy skills<sup>7</sup>. The potential consequences of this exclusion are serious: for individuals, especially those who are more vulnerable; for society; for business; and for the UK economy.

### **Specific Objective**

We will continue to place the consumer perspective, including that of people in the most deprived communities, at the heart of the digital engagement debate. We will do this by working with Go ON UK, the Government Digital Service (GDS) and other stakeholders so that we can help ensure that the full range of consumers' digital engagement needs are being met, supported by truly universal fast broadband for all. We will also encourage government and others to ensure that there are offline alternatives provided to online public service delivery for those who are unlikely to complete these processes online.

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<sup>5</sup> <http://www.communicationsconsumerpanel.org.uk/smartweb/digital-participation/the-consumer-framework-for-digital-participation>

<sup>6</sup> <http://www.communicationsconsumerpanel.org.uk/smartweb/research/bridging-the-gap:-sustaining-online-engagement>

<sup>7</sup> BBC/Go ON UK survey

## Research:

### **Micro-businesses' Experiences of Communications**

What are micro-businesses' experiences of communications services? What experience do they have of mobile usage (coverage, dropped calls etc) and what is their use of broadband (especially superfast). Under the Superfast Broadband Strategy, how will micro-businesses in the last 5% i.e. those who are not included in the undertaking to extend superfast to 95% of UK premises by 2017 - be affected? What are the barriers/challenges they face and what are the opportunities? What can the communications sector do for micro-businesses to help assist growth?

#### **Specific Objective**

This year we will publish our latest research which seeks to establish how the communications sector affects the experience and performance of micro businesses and what - if anything - should/could be done to improve that experience so that growth and the potential of micro-businesses, particularly outside major conurbations, is maximised.

### **Digital Footprints - the use of personal data**

As more and more data is collected about people - both as they knowingly disclose information on platforms such as social media and as they unknowingly share digital details about themselves as they conduct everyday business, two fundamental questions occur:

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

As noted above, although the range of opportunities offered by the internet, mobile apps and micropayments provide consumers and citizens with a host of potential benefits, it is increasingly important that people understand the implications of the consent they are giving organisations for the use of their data and the precautions they can take.

The Panel's 2011 research *Online Personal Data - the Consumer Perspective*<sup>8</sup> suggested that few consumers have top-of-mind concerns in this area, although they express significant concern when asked about specific privacy issues. We will build on our earlier research to identify and highlight the pertinent issues that need to be considered as policy making and regulation develop in this area.

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<sup>8</sup> <http://www.communicationsconsumerpanel.org.uk/online-personal-data/online-personal-data-1>



### How organisations communicate with more vulnerable consumers

This project would build on findings from the Panel's 2013 Going Round in Circles<sup>9</sup> research - that some lower-income households, older consumers and those with a disability seemed to be at a particular disadvantage in their dealings with communications providers' call centres. The study would explore how government and businesses communicate with more vulnerable customers and their provision of alternative contact methods.

Figure 2: Schedule of outline Panel Work Plan 2014/15<sup>10</sup>

	Q1	Q2	Q3	Q4
Nuisance calls	✓	✓	✓	✓
Mobile and broadband coverage and quality of experience	✓	✓	✓	✓
Customer Service and complaints	✓			✓
Privacy and security of personal data			✓	✓
Effective digital engagement	✓	✓	✓	✓
Micro-businesses' Experiences of Communications	✓	✓	✓	
Digital Footprints	✓	✓		
How organisations communicate with more vulnerable consumers			✓	✓
Affordability and debt	⇒	⇒	⇒	⇒
Consumer Information	⇒	⇒	⇒	⇒
Mobile payments	⇒	⇒	⇒	⇒
Next generation text relay services and support for video relay initiatives	⇒	⇒	⇒	⇒
Switching	⇒	⇒	⇒	⇒
Content access services	⇒	⇒	⇒	⇒
Spectrum Strategy	⇒	⇒	⇒	⇒

<sup>9</sup> <http://www.communicationsconsumerpanel.org.uk/going-round-in-circles/going-round-in-circles>

<sup>10</sup> ✓ Key areas of engagement/research

⇒ Areas to keep under review

Traffic management	⇒	⇒	⇒	⇒
DAB Switchover	⇒	⇒	⇒	⇒
Postal Services	⇒	⇒	⇒	⇒
Non-geographic calls	⇒	⇒	⇒	⇒

ACOD-specific work areas	Q1	Q2	Q3	Q4
Portrayal and participation	⇒	⇒	⇒	⇒
Accessibility	⇒	⇒	⇒	⇒