



Going round in circles?

The consumer experience of dealing with problems with communications services

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1 Foreword

The Communications Consumer Panel is a consumer body that works to protect and promote the interests and needs of consumers, citizens and small businesses in the communications sector. We aim to ensure that consumers and citizens are at the forefront of Ofcom's and communications providers' thinking when regulating and providing services respectively. We are aware of the commercial needs of the communications industry and the wider market place but believe that these should be complementary to the needs of consumers, not contradictory to them. Customer satisfaction, complaint handling and reducing the need to make a complaint are good examples of this principle - what is beneficial for consumers is also in the interests of industry.

The Panel was concerned by the levels of consumer dissatisfaction highlighted in Ofcom's Consumer Experience Report¹ and Customer Service Satisfaction research², so commissioned new independent research with Ipsos MORI to understand in greater depth why some consumers did not complain to their service providers even though they thought they had cause to do so. We were also interested in the experiences of those who had contacted their supplier to try and resolve an issue.

The Ipsos MORI research commissioned by the Panel highlights that people who don't contact their provider are often left 'getting by' with a sub-standard service. For others, the negative experience of contacting their provider, the time taken to resolve a complaint, the number of contacts required and the sheer level of persistence demanded to be able to reach a resolution exacerbated the consumer's initial frustration. This is simply unacceptable. The Panel was particularly concerned to learn through the research of the experiences of some older consumers and those with a disability who seemed to be at a particular disadvantage in their dealings with providers.

We do not believe that any provider sets out to handle complaints badly and the picture is not all bleak. Many communications providers are seeking to improve their complaints handling and, indeed, avoid giving consumers the need to complain in the first place. However, this report highlights that the consumer experience of contacting a communications provider tends to be affected by a number of systemic issues. For some consumers the complaints system is simply not working, with a number of people left feeling that they are indeed 'going round in circles'.



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¹ <http://stakeholders.ofcom.org.uk/market-data-research/market-data/consumer-experience-reports/consumer-experience/>

² Customer Service Satisfaction - Wave 4 GFK <http://media.ofcom.org.uk/2012/12/04/latest-customer-service-satisfaction-levels-revealed-2/>

2 Executive Summary

This Communications Consumer Panel report is primarily focussed on detailing the findings of our new research commissioned with Ipsos MORI - the full independent research report is attached at Annex 1. We also draw upon existing quantitative data on satisfaction and complaints levels (Chapter 3) as well as detailing information on standards in complaints handling (Chapter 4) in order to contextualise the findings of the new research.

Communications services in the UK play a pivotal role in people's lives. Consumers and citizens rely on their communications services and any interruption can therefore have a far greater impact than it might have had a few years ago. So more than ever, the consumer requires two essential things of its communications provider: for the contracted service to be provided, and, if it is not, for problems to be rectified as easily and effectively as possible.

Any communications provider wants to maximise its market share. To enable this, retaining customers through excellent customer service should be as important as competing with other providers to attract new customers. Poor customer service not only negatively impacts customers but drives contact centre and rework costs for communications providers. The prevention of faults and errors and the provision of an effective, efficient complaints process are therefore in the interests of both the communications provider and the customer.

This new qualitative research (Annex 1) focuses on people who have had a problem with their communications service³. We commissioned 60 in-depth interviews among consumers across the UK and sought to understand why some who had a communications service problem did not contact their suppliers. We also wanted to explore the experiences of those customers who did contact their service providers but experienced difficulties in resolving their issue. We were aware that not all consumers who contact their provider about a problem necessarily classed this as a formal complaint. We therefore decided to ask consumers more broadly about 'contacting suppliers about problems with communications services', rather than 'making complaints'.

Participants were recruited on the basis that they had experienced a problem with their communications service. The range of problems varied greatly, as did the reactions to the problems. The research findings indicate that people often make trade-offs when deciding whether or not to contact their suppliers about problems - for example, considering how severe the problems were and how likely their suppliers were to fix them, as well as the time and effort this would involve. The decision to contact a supplier about an issue also varied depending on initial expectations of a service: where expectations were low to start with, the likelihood of making contact was lower. No two customers are the same - problems and reactions to them vary.

³ Sixty in-depth interviews, each lasting around 90 minutes, were conducted across the UK between 20 February and 3 April 2013.

Some people suffered in silence - i.e. they did not make contact with their supplier and instead found ways to live with the problem. For those people who did contact their provider, the default contact method was by telephone. Participants' first experiences of call centres influenced the rest of the consumer journey - some of our research participants recounted positive call centre experiences, but establishing a shared understanding of the problem was a major issue for many.

There were common themes identified among those participants who did get their problem resolved. In particular, they either had a simple problem that was easily resolved by the script available to call centre staff; they found someone who would take ownership of the problem and push forward until it was resolved; or they switched to a different supplier. For some, time and persistence eventually worked but this required tenacity and optimism.

Very few of the research participants had considered escalating their problem beyond the person they were dealing with or considered seeking redress - or knew that they could do so. Even those who did consider it rarely followed through. This was largely because most did not believe anything would result from further contact or they had moved on with their lives. The few people who did escalate typically felt that they were owed money by suppliers and consequently did pursue the issue, although mostly with limited success.

2.1 Cause to Complain?

Ofcom's Consumer Experience Report 2012 (CER)⁴ found that between 6% and 10% of customers in each market have experienced some dissatisfaction with their communications services overall, with dissatisfaction levels highest in the fixed broadband market (10%). When extrapolating these percentages into approximate numbers of UK households, this represents c.1.3 million households who have experienced some level of overall service level dissatisfaction in the fixed line phone market, c.1.5 million households dissatisfied in the mobile phone market, and c.2 million households dissatisfied in the fixed broadband market⁵.

The CER also reported on the number of people who said that they had 'cause to complain' in the last 12 months. It found that 10% of UK adults said that they had cause to complain about broadband services, 6% about their fixed landline services and 5% about mobile phone services. When extrapolating these percentages into approximate numbers of UK households⁶, the number of UK households estimated to have had cause to complain

⁴ <http://stakeholders.ofcom.org.uk/market-data-research/market-data/consumer-experience-reports/consumer-experience/>

⁵ The survey data has been extrapolated to represent UK households using data from Family and Households, ONS, November 2012. This extrapolation calculation is simple and no adjustment for different numbers of individuals within households applied. The figures reported are for indicative guidance only.

⁶ The survey data has been extrapolated to represent UK households using data from Family and Households, ONS, November 2012. This extrapolation calculation is simple and no adjustment for different numbers of individuals within households applied. The figures reported are for indicative guidance only and have been rounded to the nearest '000.

range from 1.2 to 2 million, depending on the sector - with broadband receiving the highest levels of cause for complaint.

But not all consumers who feel they have cause to complain actually do so. Between 18% (in the mobile and broadband sector) and 25% (fixed line) of people did not pursue their complaints. When extrapolating these percentages into approximate numbers, this equates to 223,000 households in the mobile sector, 332,000 households in the fixed line sector and 365,000 households in the fixed broadband sector who did not pursue their complaints⁷.

Research on customer service satisfaction published by Ofcom in December 2012⁸ highlighted that across communications services an average of 16% of consumers of the various services had contacted their provider 'in the last 3 months'⁹. The study found that of these consumer contacts, between 21% - 29% regarded their contact as a complaint.

2.2 Customer Complaints Codes

Section 52 of the Communications Act 2003 places a duty on Ofcom to set general conditions to ensure that communications providers establish and maintain procedures to, amongst other things, handle complaints and resolve disputes between them and their domestic and small business customers. General Condition 14 (GC14)¹⁰ is the relevant condition for complaint handling and dispute resolution. Under GC14.4 communications providers must have and comply with procedures that conform to the Ofcom Approved Code of Practice for Complaints Handling.¹¹

Under General Condition 14.5 providers are obliged to implement and comply with an Alternative Dispute Resolution (ADR) scheme. There are penalties for non-compliance with General Condition 14.

So all communications providers in the UK must meet minimum standards in their handling of domestic and small business complaints; their complaints handling procedures must be transparent, accessible and effective; they must provide appropriate access to ADR; and they must keep reasonable records of contact with complainants. Communications providers have a special obligation under Section 2 (b) of the Code, to make sure their procedures are sufficiently accessible to consumers with disabilities. In the Code, Ofcom explains its definition of a complaint:

⁷ The survey data has been extrapolated to represent UK households using data from Family and Households, ONS, November 2012. This extrapolation calculation is simple and no adjustment for different numbers of individuals within households applied. The figures reported are for indicative guidance only.

⁸ Customer Service Satisfaction - Wave 4 GFK <http://media.ofcom.org.uk/2012/12/04/latest-customer-service-satisfaction-levels-revealed-2/>

⁹ Consumer surveys often ask 'within the last three months' to provide a reasonable frame of reference for recall. Assuming no seasonality in provider contact, this figure could be extrapolated to represent the percentage of customers who contact their provider on average across the course of a year.

¹⁰ <http://stakeholders.ofcom.org.uk/binaries/telecoms/ga/cvogc300710.pdf>

¹¹ <http://stakeholders.ofcom.org.uk/binaries/telecoms/ga/complaints-handling-code.pdf>

- a) an expression of dissatisfaction made by a customer to a Communications Provider related to either:
 - i) the Communications Provider's provision of Public Electronic Communications Services to that customer; or
 - ii) the complaint-handling process itself; and
- b) where a response or resolution is explicitly or implicitly expected.

All communications providers must provide their own 'up to date Customer Complaints Code' setting out the process for making a complaint and the minimum standards that the customer can expect when making a complaint. This Code must be well publicised and easily accessible to consumers.

In our experience, some communications providers enable consumers to easily search for and find their Complaints Code. Others are less easily located. Similarly, stated target response times to acknowledge or resolve a complaint vary significantly and are, in some cases, aspirational rather than providing a firm deadline. Although some companies provided freephone contact numbers, others gave chargeable numbers¹². While contact details for ADR services were shown by all communications providers in their Codes, details for the escalation of complaints within a company were less consistent.

2.3 Barriers to contact

In the Panel's research most consumers immediately knew if there was a problem with their service, but in some cases the individual had more difficulty identifying the problem. This could be because the problem was hidden - such as a telephone not receiving any inbound calls - or because the consumer lacked confidence in diagnosing the problem, worrying that it might be to do with them using a device incorrectly. Some participants also reported trouble distinguishing between issues with their service and problems with their own device used to access the service (e.g. laptop, handset etc).

Once identified, most participants initially tried troubleshooting the problem themselves. Some issues, however, required contact with the supplier - such as complete outage of a vital service, or substantial problems with billing. Most consumers employed short-term coping mechanisms to deal with their problem, such as finding an alternative means of accessing the service (e.g. 3G rather than fixed broadband). In cases where coping mechanisms were relatively convenient and worked well, the coping mechanism could become a long-term response to a problem.

The decision about whether or not to contact a supplier was influenced strongly by the perceived severity of the issue and the belief that the supplier could do something to resolve the problem. Perceived severity was also related to the consumer's level of reliance on the service, their previous service experience and their service expectations.

¹² Under new provisions to be introduced as part of the Consumer Rights Directive (CRD) in 2014, phone calls to customer helplines in relation to purchases should be charged at no more than 'the basic rate'.

Among the key reasons for people not contacting communications providers were their past experiences of the contact process and their perceptions of their supplier. Not only does this shape the consumer's view of the provider's complaints process but it also shapes their opinion of the provider more generally and, for some, a previous negative experience leads to them 'getting by' with a sub-standard service. An individual's level of confidence, communication skills and support from friends and family also influenced whether consumers decided to contact their supplier about a problem.

The research indicated that older consumers, typically those with less experience of technologies such as the internet, were more likely to have low service expectations. They were also more likely to feel anxious about reporting issues with technology due to a perceived lack of understanding of technical terms, which they felt they might need to be familiar with.

Consumers living in rural areas tended to have lower expectations of some services. In particular, mobile phone reception and broadband speeds were generally expected to be worse than those found in cities, and possibly more susceptible to weather-related problems, so often went unreported.

Other barriers to making contact included the perception that some types of problem could not be resolved, such as issues with mobile phone reception or broadband speeds. In a few cases the problem itself impacted on the consumers' opportunity to make contact with their provider, either because their preferred contact channel was unusable or because the issue prevented them from being able to find the contact number.

The cost of contacting a supplier and the potential call-out costs for engineers if the problem was diagnosed as your responsibility (e.g. the phone wiring in your house is faulty) can also act as barriers to contact, or lead people to 'give up', particularly for consumers with low incomes. Consumers we spoke to raised concerns about costs being incurred when a service was faulty as the provider contact number, which was free to call from a particular device e.g. mobile handset, was not free when called from other devices. Additionally, concern was raised about having to access technical support via a premium rate number. In some cases, anxiety about the cost of fixing the problem whether known or perceived, or about temporary loss of service, stopped the individual from reporting the problem.

Emotional factors sometimes helped drive contact - such as anxiety about missing something important, like a business message or family news. In other cases, anger or a sense of injustice drove the contact.

Finally, expectations about the contact process and outcome strongly influenced consumer behaviour in some cases. Positive expectations about achieving a swift resolution would facilitate contact, but negative expectations about the difficulty of dealing with the issue, or pessimism about the likelihood of a satisfactory solution, could act as barriers.

2.4 The contact experience

There are areas of the complaints procedure where our research participants felt that the providers were getting things right - many consumers we spoke to described their contact experience as fine and most people were quick to separate what they saw as 'the process' from the person they had talked to. However, as this research highlights, for some of those who did contact their provider, the initial frustration was exacerbated by a negative contact experience. Their experience of the process was confusing and unhelpful - the time taken to resolve a complaint, the number of contacts required, the cost of contact and the sheer level of persistence demanded of them to be able to reach a resolution were too great. This is simply unacceptable.

In line with the findings of quantitative ADR research published by Ofcom¹³, the majority of consumers in our research preferred to contact their suppliers by telephone. A minority preferred to speak to their supplier face-to-face. Some reported using e-mail on occasion, since this method is free and provides an automatic record of the correspondence. Letters tended to be reserved for formal complaints and escalations.

Some consumers with disabilities faced physical barriers to contacting suppliers that other consumers did not experience. Hearing difficulties could make reporting an issue more challenging. Limitations of sight or mobility could affect the individual's ability to diagnose a problem or conduct diagnostic checks such as re-setting a router or reading a password from a router. As such, some disabled consumers had a particularly strong contact mode preference, such as face to face. Due to the extra effort required by some disabled customers to deal with the contact process, stronger motivation to make contact is sometimes required.

People who telephoned their supplier had mixed experiences of getting through to someone who could help them, with some finding themselves being passed repeatedly between call centre staff and their calls dropped as they were transferred. In some cases a difficult initial experience influenced the subsequent contact behaviour, with consumers postponing further attempts to solve the problem, or seeking an alternative contact method. Most individuals were positive about the politeness and attitude of call centre staff, but many reported problems with mutual understanding. The research found that establishing a shared understanding of the problem - and its possible resolution - was also a problem encountered by some participants. Barriers to understanding were reported to have occurred in some instances when either the consumers or call centre staff had strong accents, staff used technical language that the consumer did not understand or because providers considered a call resolved - and so closed it, when this was not the consumer's view. Some participants were critical of a perceived lack of technical expertise of the call centre employees, with consumers saying some companies utilise generic troubleshooting scripts which are not fit for purpose.

¹³ http://stakeholders.ofcom.org.uk/binaries/research/telecoms-research/adr-august-2013/ADR_august2013.pdf?utm_source=updates&utm_medium=email&utm_campaign=adr-aug-2013

Ofcom's ADR research asked complainants how much time they spent actively pursuing their complaint - i.e. writing emails, letters and making phone calls. The study found that ADR 'Eligible Complainants' spent an average of nearly six hours pursuing their complaint. In terms of the number of contacts that complainants said it took to resolve an issue, Ofcom's customer service research¹⁴ found that the mobile and Pay TV sectors have a lower average of number of contacts required to resolve - Pay TV: 1.68 contacts, mobile: 1.76 contacts compared to landline: 1.91 contacts and broadband 2.1 contacts. A third of broadband customers had to contact their provider three times or more.

In terms of the time taken to deal with a complaint, the ADR research found that 22% of people said that they took time away from work for this purpose - at an average of almost five and a quarter hours.

In terms of the impact of the complaint on a person's wellbeing, Ofcom's ADR study found that just under half of 'Eligible Complainants' reported being worried by their complaint, whilst over half reported being stressed or angry.

2.5 Abandoning a complaint

The Panel's qualitative research highlighted that in a small number of cases, a frustrating initial contact with the supplier led to pessimism about whether the problem would be resolved, and hence a decision to abandon the process.

Sometimes people gave up pursuing the issue because they discovered that the service provider did not have responsibility for resolving the problem. Others gave up after being told that a fix could result in temporary loss of a vital service, or that it could cost a relatively significant amount. For example, in some cases the consumer was led to understand that the cost of repair could not be confirmed until the problem had been diagnosed and fixed by a visiting engineer, which meant some went without a proper diagnosis of their issue for fear of having to pay.

In other cases the consumer concluded, after their initial investigation, that the time and effort required to resolve the issue were greater than the problem merited. Frustration with a protracted contact process can also influence the decision to abandon the process. In some cases stronger emotions provoked by the experience can cause someone to give up as well as acting as future barrier to contact. Examples include unpleasant treatment by service providers' staff, particularly at in-home visits, and feelings of humiliation at being ignored.

After one or more failures to speak to the right person and resolve the issue, some respondents felt they did not know what to do differently in order to succeed and therefore would abandon their attempts to resolve the problem.

In summary, abandonment tended to occur when a fear of further stress outweighed the perceived benefits of pursuing an issue to its resolution.

¹⁴ <http://media.ofcom.org.uk/2012/12/04/latest-customer-service-satisfaction-levels-revealed-2/>

2.6 Escalation and compensation

If a consumer or micro business (that is, a business employing 10 or fewer people) complaint reaches deadlock, or a dispute is older than eight weeks, the complaint can be referred to an ADR scheme. Communications providers must be signed up to one of the two accredited schemes: the Communications and Internet Service Adjudication Scheme (CISAS) or Ombudsman Services: Communications (OSC).

Many participants in our research had not considered escalating their issue, either with their service provider, or with a third party. With third party escalation processes in particular, lack of knowledge was a significant barrier. In addition, some had low expectations of the efficacy of their supplier's formal complaints process following a negative customer service journey, which formed a strong barrier. Others simply did not want to expend any more energy on an issue that had already consumed much of their time. Another set of barriers to escalation concerned individuals' abilities to collect and present evidence of their problem and their subsequent interaction with their provider. Where escalation did occur, strong emotions were often a motivating factor. In many cases a significant financial impact and the desire for compensation had driven the decision to escalate.

In Ofcom's ADR research, of all complainants, 27% were eligible for ADR referral. However of those eligible, only 16% were referred to ADR - and even fewer (7%) actually went through the ADR process. The research found that a key issue is that overall awareness of ADR among 'Eligible Complainants' is low (30%). 'Eligible Complainants' therefore rely on their service provider to inform them about ADR, but in many cases this is not happening. Only 14% of 'Eligible Complainants' recall receiving written notification informing them of their right to a referral to an ADR scheme.

The Panel also noted the comments made by Ombudsman Services: Communications in its 2012/13 Annual Report¹⁵: "The level of customer service offered by companies remains a significant driver of dissatisfaction. ... Customer service is the most common complaint about communications suppliers, so we advise participating companies to communicate clearly with their customers and keep them informed. They should call their customers back, respond to their letters, explain if there is a delay and, importantly, do what they say they are going to do... Many cases are about a straightforward issue, perhaps a disputed bill or line fault, which escalates because the issue is not handled effectively."

2.7 Resolution

Our participants found that some problems were easily resolved via a single contact to the supplier. This was either because the problem was suited to general troubleshooting guidance, or because it was part of a wider network problem that the supplier was addressing and which they could reassure the consumer about.

For more complex problems, reaching the right individual was key to resolving the issue: this often needed to be someone with technical expertise who could take ownership of the

¹⁵ <http://www.ombudsman-services.org/downloads/OS%20Annual%20Report%202013.pdf>

problem. Finding this person was not always easy, since most call centre staff were found to have a very limited capacity to help in non-standard cases. Some consumers were skilled at accessing an expert who could help, either through persuasion, threat of changing supplier, or simply via a direct telephone number that they had acquired in an earlier process. Others, however, had tried and failed to reach someone who could help. A small number of consumers described using the threat of switching supplier as a way of resolving an issue that their current supplier had been unable or unwilling to sort out. However, most consumers did not see this as a viable solution.

The Ofcom customer service satisfaction study found that for all service types, between 79% and 92% of issues are seen by the complainant as at least partially resolved - although in many cases this requires more than one contact, especially for faults. Faults in the mobile and broadband sectors - typically poor reception and slow connection speed, respectively - are least well resolved (around 20% unresolved).

2.8 Customer Service Satisfaction

Research conducted for Consumer Focus in 2011 *Consumer Experience of Complaint Handling in Six Sectors*¹⁶ found that telecoms was judged the lowest performing sector. Setting aside the decision on their complaint, 40% of telecoms complainants said that they were very dissatisfied with the way the company dealt with their complaint and 19% said that they were quite dissatisfied. Thirty percent of respondents were very or quite satisfied.

Ofcom has found that ratings of various aspects of providers' customer service have generally improved since measurement began in 2009. Ofcom's customer service satisfaction survey¹⁷ found that UK providers of landline, broadband, mobile and Pay TV services provide a customer service experience which results in 62%-69% of customers being satisfied when they contact their provider but 11%-17% registered dissatisfaction. Despite year-on-year improvement, satisfaction with customer service remains lowest in the broadband sector (62%) and highest in the Pay TV sector (69%). However for those people who made a complaint, satisfaction levels were much lower - ranging from 43% - 47%.

When assessing the individual elements of the complaints process, Ofcom's customer service research found that for all providers the courtesy and politeness of advisers scored well, followed by advisers who took the question/issue seriously and the ease of finding provider contact details. However consumers' satisfaction with providers calling back when they said they would and offering compensation/goodwill payments consistently scored much lower. Both the broadband and landline sector scored particularly poorly by comparison with the other sectors in relation to the ease of getting through to the right person and the time taken to handle the issue. These themes are echoed in Ofcom's ADR research, which found that key factors in dissatisfaction with the complaint process were

¹⁶ <http://www.consumerfocus.org.uk/files/2012/09/DJS-research-report-Complaints-Survey.pdf>

¹⁶ <http://www.consumerfocus.org.uk/files/2012/09/DJS-research-report-Complaints-Survey.pdf>

¹⁷ <http://media.ofcom.org.uk/2012/12/04/latest-customer-service-satisfaction-levels-revealed-2/>

the ease of resolving a complaint with a provider and the time taken to resolve a complaint. Just under half of respondents expressed dissatisfaction with the provider making clear how the complaint would be handled. This followed a similar pattern across the sectors.

2.9 Independent accreditation and ratings

Contact and call centres are a well-established feature of many businesses' operations. The Customer Contact Association (CCA) is an independent accreditation body for call and contact centres' strategies and operations and offers a 'Global Standard' accreditation¹⁸ which has been designed to increase the reliability and effectiveness of the customer contact operation. The Panel noted that Ofcom's own phone contact centre first achieved CCA accreditation in 2009 and both the written and phone team continue to meet this standard having undergone re-assessment in 2013. The Panel is both surprised and concerned that although some - but by no means all - providers are members of the CCA, none of the major telecommunications providers operating in the UK are listed as having this accreditation.

Similarly, we could find no reference to any communications provider having accreditation with the BS Standard ISO 10002¹⁹; the international standard for Customer Satisfaction complaints handling or encountered any information that suggested that communications providers belonged to an alternative scheme of accreditation or quality assurance.

Finally, we note that Ofcom's customer service satisfaction research found that impartial ratings of providers are still considered useful by two thirds of customers, and particularly by dissatisfied customers.

2.10 Recommendations

The Panel's research highlights areas where consumers would significantly benefit from a renewed focus from communications providers. The Panel was particularly concerned to learn of the experiences of some older consumers and those with a disability who seemed to be at a particular disadvantage in their dealings with providers.

Following the issues highlighted by the research, and our own subsequent exploration of the issues, we make the following recommendations in five key areas:

- **The provision of information**
- **Review and strengthen contact centre staff training**
- **Improving the consumer contact experience**
- **Provide greater support for older and disabled consumers**
- **Review and strengthen escalation and ADR referral processes**

¹⁸ <http://www.cca-global.com/gsx/content/awards/?contentid=112>

¹⁹ <http://www.bsigroup.co.uk/en-GB/iso-10002-complaints-management/>

1. The provision of information

- a) Communications providers should provide better, jargon-free information for consumers about:
 - o service expectations;
 - o simple troubleshooting;
 - o clearly signposted and accessible contact points;
 - o information about the complaint process/easy to follow process maps etc.
- b) Communications providers' tone (written and verbal) should reassure consumers that seeking to resolve problems is a positive action and they should welcome the opportunity to improve their own performance.
- c) We would encourage third parties, such as consumer facing groups and comparison websites, to use independent customer service ratings. These would be valuable for consumers looking to choose or switch provider.
- d) All stakeholders, including consumer-facing organisations such as comparison websites, could assist by:
 - o explaining how best to make a complaint;
 - o what might constitute a problem;
 - o who to contact for different issues;
 - o providing guidelines/letter and email templates;
 - o information about what is a reasonable resolution;
 - o how to escalate an issue; and
 - o promoting the potential benefits of pursuing a complaint.

2. Review and strengthen contact centre staff training

- a) Communications providers should review their training plans to ensure that staff have a clear understanding of the end to end complaints procedure, including ADR.
- b) Communications providers' staff should:
 - o be able to establish a shared understanding of the problem with the consumer;
 - o have relevant technical expertise;
 - o be able to explain technical terms in layman's language;
 - o go 'off-script' if necessary;
 - o be empowered to take ownership of complaints; and

- have the ability to look at alternative options or feel able to escalate the problem earlier in the process.

3. Improving the consumer contact experience

Significant steps can be made by communications providers to improve the contact experience. Areas for review include:

- a) Process - Communications providers should:
 - maintain better records, which incorporate clear details of previous conversations with the consumer including a staff name (which should be given to the consumer both at the start and end of each contact);
 - provide information about how a complaint will be handled, which is accessible to the consumer and all the communications provider's call centre staff;
 - provide consumers with a unique reference number and firm timescales;
 - call back when promised and build time into schedules to provide updates and follow-ups;
 - supply consumers with a free copy of their complaint records quickly and easily;
 - take into account consumers' apparent preference for telephone contact for particular issues and that some disabled consumers have particularly strong contact mode preferences, such as face to face. This is also of relevance for Government service provision as it moves towards 'digital by default' and designs assisted digital provision; and
 - we would encourage the exploration of virtual assistance for those who are able to access it and the option for people to email 'live chat' sessions back to themselves as a record.
- b) Cost to the consumer - communications providers should enable consumers to:
 - contact their supplier at a minimum via a freephone telephone number, email and post;
 - have greater certainty in relation to the cost of repairs - communications providers should give much clearer information about potential call out charges, and the circumstances under which a charge will be applied;
 - Access short-term workarounds - in limited circumstances communications providers should provide e.g. call diversion or temporary fixes of a similar standard to the affected service such as a replacement handset;
- c) All communications providers should undertake relevant customer service accreditation and place greater value on customer service quality as a competitive feature. They should promote this to existing and potential customers; and
- d) Ofcom should continue to conduct occasional audits to check whether communications providers are meeting their obligations as set out in the Code of Practice.

4. Provide greater support for older and disabled consumers

- a) Communications providers should:
 - o Signpost people with severe hearing or speech impairments to their preferred contact method from a range including e-mail, SMS, text phone and text relay or video relay services²⁰;
 - o if they are not already doing so, follow appropriate guidelines in respect of handling calls from disabled customers²¹; and
 - o instil a greater awareness of disability-related issues among their workforce and ensure their processes are accessible to all their customers. Consumer equipment should provide information in an easily accessible format, including labelling e.g. serial numbers or codes on broadband hubs.

5. Review and strengthen escalation and ADR referral processes

- a) Communications providers should:
 - o review and strengthen their escalation processes and staff awareness of them to make them more effective; and
 - o ensure that consumers are aware of their rights, particularly with regard to the use of ADR, early in the process.
- b) Ofcom should independently review the efficacy of, and access to, escalation procedures across the industry.
- c) Ofcom, the ADR schemes, industry and consumer advocates should undertake serious consideration of a shorter complaint duration time than eight weeks before consumers can approach the ADR schemes.

²⁰ 62,000 people registered for access to emergency services via SMS by Aug 2013. In 2013, Ed Vaizey, Minister for Culture, Communications and Creative Industries wrote to more than 80 FTSE companies engaged with customer services to encourage them to communicate with their deaf and hard-of-hearing customers through a mix of more suitable contacts, be it by e-mail, SMS, text relay, Typetalk or video relay services—VRS. In the 2011 Census, more than 20,000 people in England and Wales gave sign language as their main language. For those who have difficulty with written or spoken English, video access with a sign interpreter may be the appropriate adjustment.

²¹ <http://consumers.ofcom.org.uk/files/2010/05/callcentres.pdf> and Business Disability Forum: http://businessdisabilityforum.org.uk/uploads/files/YCIITU_generic_2010.pdf

3 Quantitative research findings

To provide a background context to the Panel's qualitative research, this chapter draws together some of the quantitative work that has been carried out in this area by Ofcom. It also references a Complaints Handling research report published by Consumer Focus²².

The genesis for the new Panel qualitative research was, in part, driven by some of the findings reported in Ofcom's Consumer Experience Report 2012 (CER)²³ and customer service satisfaction research published by Ofcom in December 2012²⁴. The CER report details that while the majority of customers in each market remain satisfied with their communications services overall, between 6% and 10% have experienced some dissatisfaction, depending on the market - with dissatisfaction levels highest in the fixed broadband market (10%). When extrapolating these percentages into approximate numbers of UK households, this represents c.1.3 million households who have experienced some level of overall service level dissatisfaction in the fixed line phone market, c.1.5 million households dissatisfied in the mobile phone market, and c.2 million households dissatisfied in the fixed broadband market²⁵.

The CER research also found that while levels of dissatisfaction with reliability of service in the fixed-line market fell from 6% to 3% between 2011 and 2012, over the same period dissatisfaction with mobile service reliability nearly doubled from 7% to 13%. The fixed broadband market reported the second-highest level of dissatisfaction - at 9% - unchanged since last year. Again, when extrapolating these percentages into approximate numbers of UK households, they represent c.664,000 households who have experienced some level dissatisfaction with reliability in the fixed line phone market, c.1.8 million households dissatisfied in the broadband market, and a significant 3.2 million households who have experienced dissatisfaction towards reliability of service in the mobile phone market. The same research also found that 17% of fixed broadband customers were dissatisfied with the speed of their broadband service, although 76% were satisfied.

²² <http://www.consumerfocus.org.uk/files/2012/09/DJS-research-report-Complaints-Survey.pdf>

²³ <http://stakeholders.ofcom.org.uk/market-data-research/market-data/consumer-experience-reports/consumer-experience/>

²⁴ Customer Service Satisfaction - Wave 4 GFK <http://media.ofcom.org.uk/2012/12/04/latest-customer-service-satisfaction-levels-revealed-2/>

²⁵ The survey data has been extrapolated to represent UK households using data from Family and Households, ONS, November 2012. This extrapolation calculation is simple and no adjustment for different numbers of individuals within households applied. The figures reported are for indicative guidance only.

Figure 1 Levels of satisfaction/dissatisfaction by sector and corresponding household estimates

	Fixed line	Mobile phone	Fixed Broadband
%			
Overall satisfaction	87%	89%	84%
Overall dissatisfaction	6%	6%	10%
Dissatisfaction with reliability of service	3%	13%	9%
Estimated number of UK households **			
Overall satisfaction	19,260,000	22,048,000	17,046,000
Overall dissatisfaction	1,328,000	1,486,000	2,029,000
Dissatisfaction with reliability of service	664,000	3,220,000	1,826,000

Sources: Ofcom Consumer Experience Report 2012

** The survey data has been extrapolated to represent UK households using data from Family and Households, ONS, November 2012. This extrapolation calculation is simple and no adjustment for different numbers of individuals within households applied. The figures reported are for indicative guidance only and are rounded to the nearest '000.

The CER research also reported figures for those who said that they had 'cause to complain' in the last 12 months. It found that 10% of UK adults said that they had cause to complain about broadband services vs. 6% complaining about their fixed landline services and 5% complaining about mobile phone services. The conversion from consumers feeling they have cause to complain to actually making a complaint is 75% for fixed lines and 82% for both mobile and broadband services. The converse of this data tells us that between 18% - 25% of customers who felt that they had cause for complaint did not pursue their complaints.

When extrapolating these percentages into approximate numbers of UK households, the number of UK households estimated to have had cause to complain range from 1.2 to 2 million, depending on the sector - with broadband again, receiving the highest levels of cause for complaint. The number of households per sector who are estimated to have had cause to complain but chose to suffer in silence ranges from 223,000 to 365,000.

Figure 2: Percentage of consumers who have had cause to complain in the past 12 months and corresponding household estimates

	Fixed line	Mobile phone	Fixed Broadband
%			
Cause to complain	6%	5%	10%
Actually complain among those with cause to	75%	82%	82%
Estimated number of UK households **			
Cause to complain	1,328,000	1,238,000	2,029,000
Actually complain	996,000	1,015,000	1,664,000
Had cause to complain but did not	332,000	223,000	365,000

Source: Ofcom Consumer Experience Report 2012

** The survey data has been extrapolated to represent UK households using data from Family and Households, ONS, November 2012. This extrapolation calculation is simple and no adjustment for different numbers of individuals within households applied. The figures reported are for indicative guidance only and are rounded to the nearest '000.

3.1 Complaint levels

Research on customer service satisfaction published by Ofcom in December 2012²⁶ highlighted that across communications services an average of 16% of consumers of the various services had contacted their provider 'in the last 3 months'²⁷. The report notes that there has been a significant year-on-year decrease in the level of contacts in all sectors except mobile - where both complaints and dissatisfaction with customer service have increased in the last few years.

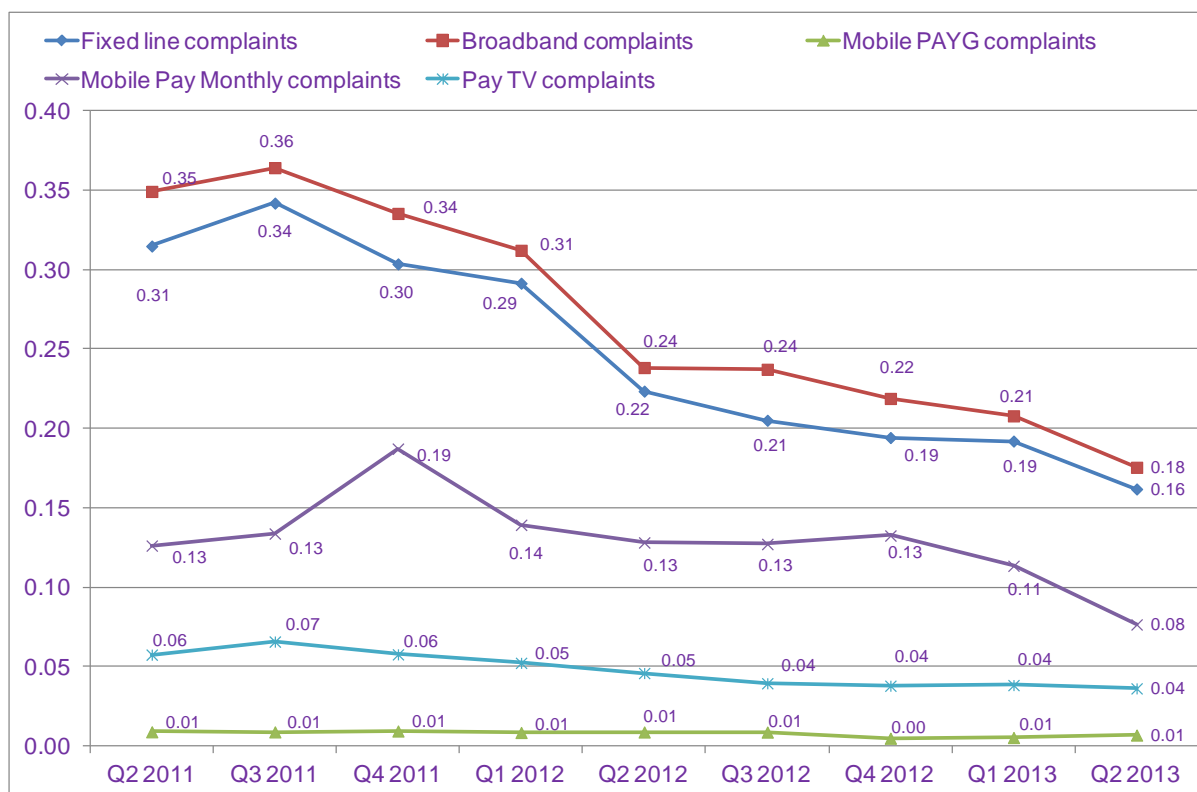
This study found that of consumer contacts, between 21% - 29% regarded their contact as a complaint. The proportion of contacts considered to be complaints in the Pay TV sector (21%) was significantly lower than in all other sectors. The mobile sector also received a lower proportion of complaints (25%) compared with the broadband sector (29%). It is worth noting that there is some variation in the level of complaints between providers within the landline and pay TV sectors but complaint levels about mobile and broadband service are broadly comparable across providers.

²⁶ Customer Service Satisfaction - Wave 4 GFK <http://media.ofcom.org.uk/2012/12/04/latest-customer-service-satisfaction-levels-revealed-2/>

²⁷ Consumer surveys often ask 'within the last three months' to provide a reasonable frame of reference for recall. Assuming no seasonality in provider contact, this figure could be extrapolated to represent the percentage of customers who contact their provider on average across the course of a year.

Information published by Ofcom on the levels of complaints it receives²⁸ about the different telecommunications sectors is of interest in this context. The chart below illustrates complaints received over the two year period from Q2 2011 until Q2 2013. The chart highlights the relatively higher level of complaints made about broadband and fixed lines per 1000 customers/connections.

Figure 3: Relative volume of complaints per sector per 1000 customers/connections Q22011 - Q2 2013



Source: Ofcom complaints data

3.2 Types of complaints

When looking at the types of complaints made about the different communications services the issues are varied and span billing, faults/repairs and other more general complaints. The biggest area of concern relates to broadband connection speeds (17%). All other complaints are recorded at less than 10%.

²⁸ <http://stakeholders.ofcom.org.uk/binaries/research/telecoms-research/complaints/q1-jan-mar-13.pdf>

3.3 The Complaints Process

As the communications regulator, Ofcom has a duty to set regulations for communications providers' complaints handling procedures to ensure consumers do not experience harm and detriment²⁹.

If a consumer complaint reaches deadlock, or a dispute is older than eight weeks, the complaint can be referred to an ADR scheme. Communications providers must be signed up to one of the two accredited schemes.

Ofcom has recently published research into communications providers' referral of consumers to ADR schemes³⁰. The research spoke to 1524 consumers who were classed as 'Eligible Complainants' - that is, someone who had made a complaint in the last 12 months that was unresolved for more than 8 weeks, or a complaint that has been unresolved for less than 8 weeks but for which the complainant has received written notification of their right to Apply to ADR or a deadlock letter.

The findings of this new ADR research reported that the telephone was the channel most commonly used to make a complaint. 89% of consumers who contacted their provider did so via telephone at some point and for 76% it was the first method of contact. This is similar to the figures found in the customer service satisfaction survey, where the telephone was the only method of contact for between 61% - 70% of consumers across sectors.

Increasing use of email was evident, but more traditional methods of communicating aspects of the complaints process e.g. by phone or letter, remained the preference of many complainants.

Ofcom's ADR research asked complainants how much time they spent actively pursuing their complaint - i.e. writing emails, letters and making phone calls. The study found that ADR 'Eligible Complainants' spent an average of 5 hours 58 minutes pursuing their complaint - ADR users spent 6 hours 7 minutes. In line with Ofcom's customer service research, the time taken to contact pay TV (5 hours 26 minutes) and mobile providers (5 hours 45 minutes) was less than the time spent for contacting landline providers (6 hours 33 minutes) and fixed broadband providers (6 hours 2 minutes).

In terms of the number of contacts that complainants say it takes to resolve an issue, Ofcom's customer service research found that the mobile and Pay TV sectors have a lower average of number of contacts required to resolve: Pay TV 1.68 contacts, mobile 1.76 contacts; landline 1.91 contacts; and broadband 2.1 contacts. Similarly, the percentage of complaints that only require one contact to resolve are higher in the Pay TV and mobile markets - at 60% for Pay TV and 58% for mobile compared to 51% for landline and 46% for

²⁹ More information can be found at

<http://stakeholders.ofcom.org.uk/binaries/telecoms/ga/complaints-handling-code.pdf>

³⁰ http://stakeholders.ofcom.org.uk/binaries/research/telecoms-research/adr-august-2013/ADR_august2013.pdf?utm_source=updates&utm_medium=email&utm_campaign=adr-aug-2013

broadband. The number of complainants who had to contact their provider three or more times was again lower in the pay TV market - at 18% - than in any other sector. A third of broadband customers had to contact their provider three times or more.

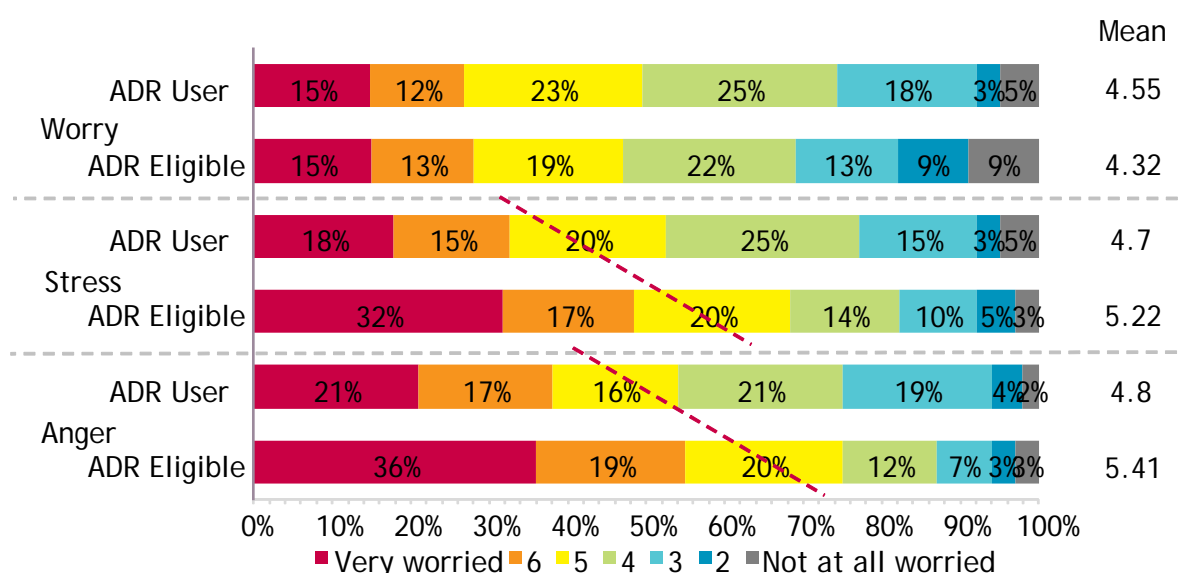
The number of times that a complainant contacted their provider was actually less, on average, for an ADR user (5.31 times) than all ADR 'Eligible Complainants' (5.9 times). However this ADR research found that the number of contacts required was greatest in the landline sector (6.76 times), followed by pay TV (6.05), mobile (5.75) and fixed broadband (5.74).

The ADR study found that estimates of the costs involved in pursuing a complaint ranged from just over £46 for broadband to over £56 for landline complaints. Respondents were asked about costs they may have incurred, for example, the size of the original amount charged, the impact of any loss in service and the costs incurred in trying to resolve the problem.

Respondents were asked about the time taken away from work or carer commitments to deal with the complaint. 22% of people said that they took time away from work to deal with the complaint - at an average of almost five and a quarter hours. 8% said they took time away from carer commitments - at an average of 5.64 hours. Of those working, over a third of complainants are dealing with complaints during working hours.

In terms of the impact of the complaint on a person's wellbeing, just under half of 'Eligible Complainants' reported being worried by the complaint (47% registered 5 or more on the scale of concern), whilst over half reported being stressed or angry. However the use of an ADR scheme appeared to lessen people's experience of stress and anger.

Figure 4: Levels of worry, stress and anger in resolving a complaint



Sources: Ofcom ADR Research 2013
 Q: worried/ stressful/ angry did you feel while trying to resolve the complaint?
 Base: Eligible Complainants: (n=1524); ADR Users (n=111)

In the ADR research, of all complainants, 27% were eligible for ADR referral - that is, the matter had continued for more than eight weeks or they had received a deadlock letter from their communications provider. However of those eligible, only 16% were referred to ADR - and even fewer (7%) actually went through the ADR process. A key issue is that overall awareness of ADR among 'Eligible Complainants' is low (30%). This is especially true among complainants in higher age brackets, the self-employed and those on home duties³¹.

'Eligible Complainants' therefore rely on their service provider to inform them about ADR, but in many cases this is not happening. Only 14% of 'Eligible Complainants' recall receiving written notification informing them of their right to apply to an ADR scheme. Only half of those 'Eligible Complainants' who say they are aware of ADR recall receiving written notification of their right to refer their complaint to an ADR scheme. Only a third of 'Eligible Complainants' aware of ADR actually apply to have their complaints referred to the scheme. In some cases this is due to the communications provider resolving the complaint, in others the consumer prefers to give the provider more time, or simply gives up.

3.4 Resolution

The Ofcom customer service satisfaction study found that for all service types between 79% and 92% of issues are seen by the complainant as at least partially resolved - although in many cases this requires more than one contact, especially for faults. Faults in the mobile and broadband sectors - typically poor reception and slow connection speed, respectively - are least well resolved (around 20% unresolved).

In the broadband sector there has been improvement since 2011 in the resolution of billing contacts, although the proportion of unresolved complaints and queries about faults has increased in the same period.

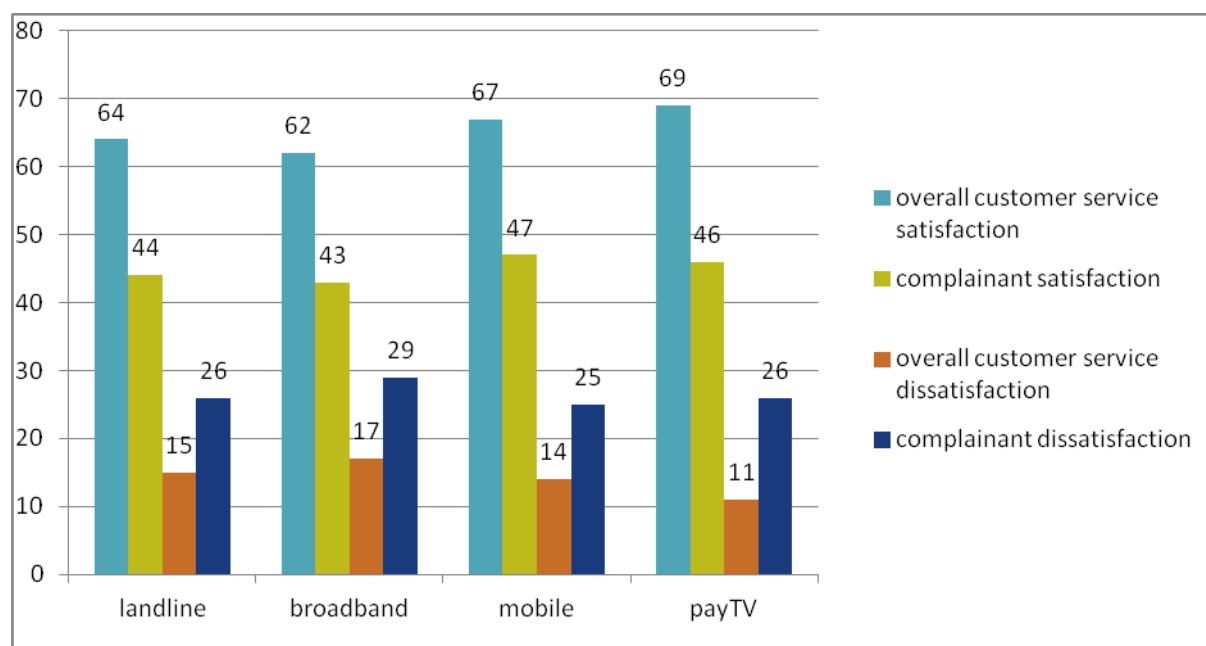
3.5 Levels of satisfaction towards contact with a provider

Since first measured in 2009, Ofcom has found that ratings of various aspects of providers' customer service have generally improved. The customer service satisfaction survey found that UK providers of landline, broadband, mobile and Pay TV services provide a customer service experience which results in levels of dissatisfaction which range from 11% - 17%, while 62% -69% of customers say they are satisfied when they contact their provider.

Ofcom's customer service report notes that, despite year-on-year improvement, satisfaction with customer service remains lowest in the broadband sector (62%). It is highest in the Pay TV sector (69%) and satisfaction levels in the landline and mobile markets are 64% and 67% respectively. However for those people who made a complaint, satisfaction levels were much lower - ranging from 43% in the broadband sector, 44% for landline, 46% for Pay TV and 47% for mobile.

³¹ People on home duties are those who are neither employed nor claiming unemployment benefit.

Figure 5: Percentage levels of customer service satisfaction



Data source: Ofcom ADR Research 2013

Research conducted for Consumer Focus in 2011 *Consumer Experience of Complaint Handling in Six Sectors*³² found that on average across the different indicators used in the research, legal services received the highest level of overall satisfaction (65% of respondents were either very satisfied or quite satisfied), while telecoms was judged the worst performer (30%). The other markets were broadly similar - Royal Mail (41%), energy (41%) and water (47%). The report suggests that there is scope for learning across sectors with the best practice from better performing markets or ombudsmen being taken on board by others. Setting aside the decision on their complaint, 40% of telecoms complainants said that they were very dissatisfied with the way the company dealt with their complaint and 19% said that they were quite dissatisfied. Other issues raised in the cross-market complaints research were:

- People were generally dissatisfied with the response to their initial complaint. Dissatisfaction was greatest about the quality of information companies provided and how well the company appeared to understand customers' issues;
- The most common reason to complain was wanting a change in how a service is offered (25%) or a refund (23%);
- Around three-quarters of people were not given clear information about what would happen next when they made their complaint; and
- On average, just a quarter of consumers were told they can take their complaint to an ombudsman. Three-quarters of people complaining in the legal sector were told

³² <http://www.consumerfocus.org.uk/files/2012/09/DJS-research-report-Complaints-Survey.pdf>

they can take their complaint to an ombudsman - by contrast only 12% of telecoms customers were told this.

Across all elements of the customer service process that the Ofcom customer service research assessed, it is noticeable that the mobile and pay TV sectors outperformed the landline and broadband sectors.

For all providers the courtesy and politeness of advisers scored well, followed by advisers who took the question/issue seriously and the ease of finding provider contact details. However consistently scoring lower in terms of consumers' satisfaction were providers not calling back when they said they would and failing to offer compensation/goodwill payments.

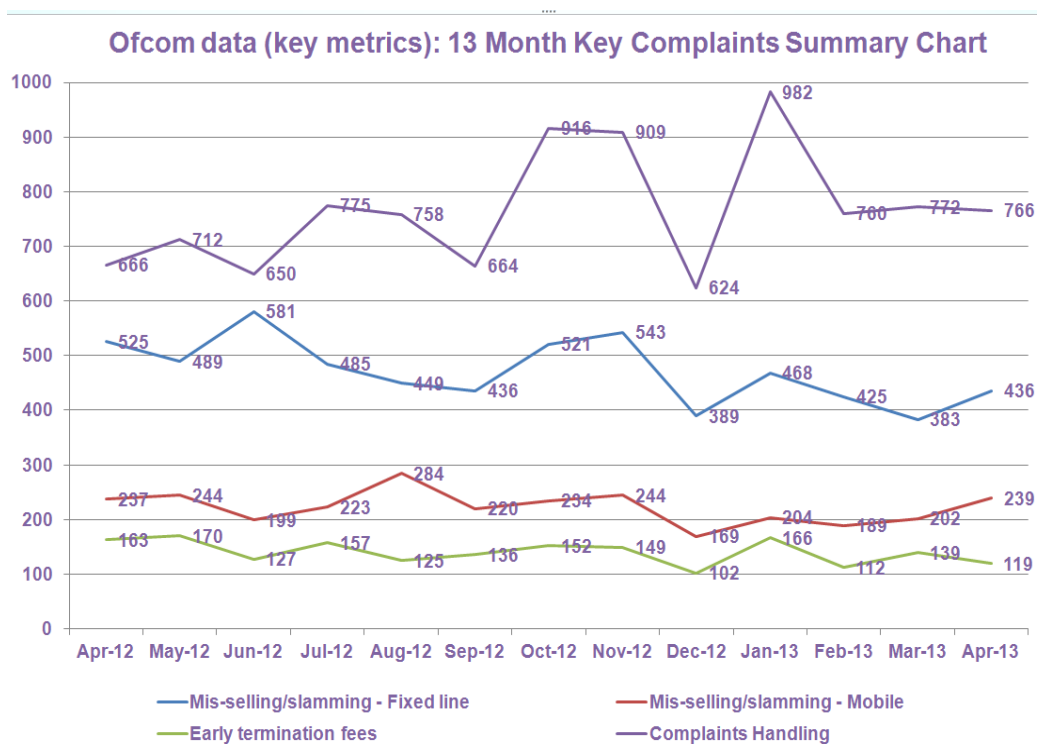
Both the broadband and landline sector scored poorly by comparison with the other sectors in relation to the ease of getting through to the right person and the time taken to handle the issue. Other issues highlighted in the broadband sector included the ability of the adviser to understand the issue, the logging of details to prevent a consumer having to repeat the problem and offering compensation/goodwill payments. For the landline sector, the ability of the adviser to understand the issue, being kept informed, the logging of details to prevent a consumer having to repeat the problem and offering compensation/goodwill payments scored poorly by comparison with the mobile and pay TV sectors.

The ADR research found that key factors in dissatisfaction with the complaint process were the ease of resolving a complaint with a provider (57% rated this 1 or 2 on a 7 point numeric satisfaction scale, where 1 is the lowest and 7 is the highest) and the time taken to resolve a complaint (60%). Just under half (46%) of respondents expressed dissatisfaction with the provider making clear how the complaint would be handled - an issue raised in the Consumer Focus research - and the same percentage expressed dissatisfaction with the final outcome. Two fifths (42%) expressed dissatisfaction with getting their provider to recognise the complaint. This followed a similar pattern across the sectors - although with varying levels of registered dissatisfaction. While pay TV scored well by comparison with other sectors, complaints did express relatively high levels of dissatisfaction in relation to their provider making clear how the complaint would be handled. In this research, mobile did not maintain the lower levels of dissatisfaction seen in the customer service report.

Satisfaction with the final outcome of the complaint is higher among ADR Users which suggests that when ADR is used, the consumer experience is improved. However, satisfaction with the outcome should not be taken to mean that the complainant had an overall positive experience, given the initial unsatisfactory complaint experience which presumably led to them approaching ADR.

Ofcom receives complaints from consumers about how communications providers have handled their problems including: the amount of time they have to queue on the telephone, not receiving responses to letters or emails, not being able to escalate complaints, and the quality of staff. The chart below shows monthly complaint trends for some of the key areas of consumer dissatisfaction from April 2012 - April 2013.

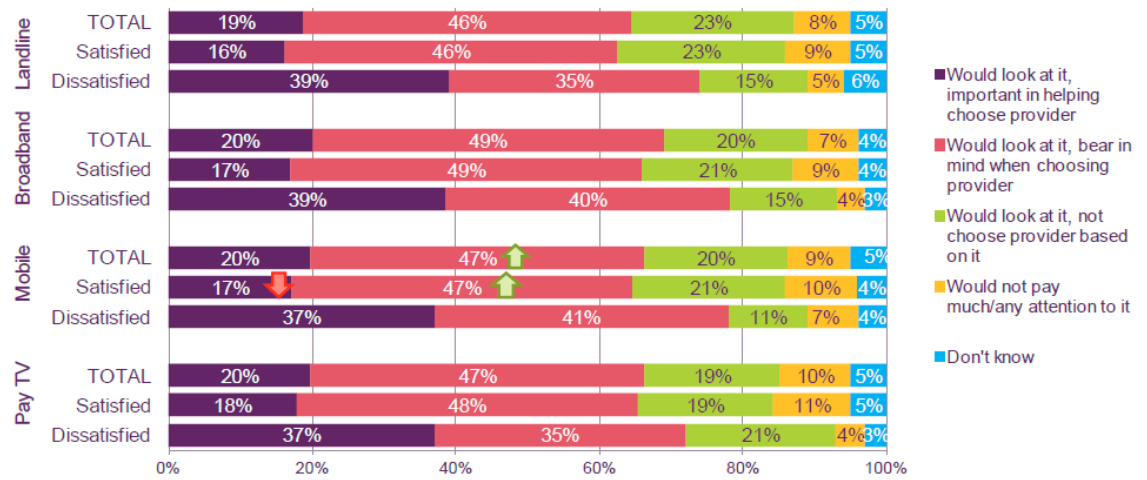
Figure 6: Monthly complaint trends from April 2012 - April 2013.



3.6 Providing impartial ratings of providers

Ofcom has found that impartial ratings of providers are still considered useful by two thirds of customers, and particularly by dissatisfied customers - although such information has become less important to customers in the mobile sector over the last year. Across all four sectors, around two thirds of customers said that they would at least bear such information in mind when choosing a service provider, while around a fifth in each sector said it would be an important factor in their decision. Dissatisfied customers in each sector were more likely to agree that impartial rating information would be important.

Figure 7: Need for impartial information - all services



NB: It is worth noting in this type of questioning that consumers tend to overstate intention to act and in reality actions are likely to be lower.

Q8: If you were provided with customer service ratings for different companies, so that you could distinguish between good and bad performance... Which of the following statements do you think would best describe your attitude to that information if you were thinking about changing from [PROVIDER] to an alternative provider ... ?

Base: All UK households contacting provider (Total/Satisfied/Dissatisfied): Landline 1,200/764/184, Broadband 1,903/1,135/327, Mobile 2,192/1,478/291, Pay TV 1,152/800/130.

4 Standards of complaints handling in communications

This section provides information about some of the standards and benchmarks that are available for communications providers to both aspire to and implement.

Essentially, the consumer requires two things of a communications provider:

- for the contracted service to be provided, and if it is not,
- for the process to get the problem rectified to be as easy and effective as possible.

The prevention of faults/errors and the provision of an effective, efficient complaints process is in the interests of both the communications provider and the consumer. The consumer receives a good service; the provider retains customers and attracts new ones through reputation.

However, as this new research highlights, some customers do not make it to the stage of contacting the provider - opting instead to put up with the problem rather than go through the process of complaining.

The research notes that a key reason for people not contacting communications providers to complain is due to their past experiences or frustration and a perception that there will be a lack of effective help. Not only does this negative experience shape the consumer's view of the provider's complaints process; it also shapes their opinion of the provider more generally. A satisfied customer is likely to be one that is more committed to staying with the company and, additionally, recommend it to others. Once a negative experience is established in the mind of the consumer it can be extremely difficult to correct. Negative experiences, even if they are not indicative of the provider's customer service as a whole, stick in the mind of the consumer.

There are areas of the complaints procedure where our research participants felt that the providers were getting things right. Most participants were quick to separate what they saw as 'the process' from the person they had talked to. Whereas in many instances they had found the process confusing and unhelpful, most were generally positive about the courteousness of call centre staff.

However, this research highlights that sometimes people have difficulty even getting through to a person who can handle their complaint. So the frustration of the problem or complaint issue is exacerbated by the negative experience of complaining itself. It is easy to see how this influences people's mindsets and the likelihood of the person bothering to complain about future problems. The Panel was especially concerned to learn of the experiences of some older consumers and some of those with a disability who seemed to be at a particular disadvantage in their dealings with providers.

Previous quantitative research conducted by Ofcom supports the findings of this research. The latest customer service satisfaction survey published by Ofcom in December 2012

showed that no communications sector (fixed broadband, landline, mobile and Pay TV) achieved higher than a 69% satisfaction rating for their customer services, with fixed broadband achieving the lowest rating at 62%. While levels of satisfaction have improved since the survey first started in 2000 it is clear that there is still a long way to go.

4.1 Ofcom approved Code of Practice for Complaints Handling

Section 52 of the Communications Act 2003 places a duty on Ofcom to set general conditions to ensure that communications providers establish and maintain procedures to, amongst other things, handle complaints and resolve disputes between them and their domestic and small business customers. General Condition 14 (GC14) is the relevant condition for complaint handling and dispute resolution³³

Under GC14.4 communications providers must have, and comply with, procedures that conform to the Ofcom Approved Code of Practice for Complaints Handling³⁴ when handling complaints made by domestic and small business customers. Under General Condition 14.5 providers are obliged to implement and comply with an ADR scheme. There are penalties for non-compliance with General Condition 14. Under Section 96 of the Act, Ofcom may impose a penalty of up to 10% of turnover for failure to comply with a formal notification within the time period specified.

The Ofcom approved Code of Practice for Complaints Handling sets out the minimum standards that all communications providers must meet in their handling of domestic and small business complaints and requires a provider's complaints handling procedures to be transparent, accessible and effective, whilst facilitating appropriate access to ADR and keeping records of contact with complainants. Ofcom also provides an online guide for consumers about making a complaint³⁵.

Communications providers have a special obligation under Section 2 (b) of the Code, to make sure their procedures are sufficiently accessible to ensure that consumers with disabilities can lodge and progress complaints.

In the Code, Ofcom explains its definition of a complaint:

- a) an expression of dissatisfaction made by a customer to a Communications Provider related to either:
 - i) the Communications Provider's provision of Public Electronic Communications Services to that customer; or
 - ii) the complaint-handling process itself; and
- b) where a response or resolution is explicitly or implicitly expected.

In the guidance notes which accompany the Code, Ofcom further notes:

"Our intention in defining a Complaint is to ensure there is clarity as to the scope of the matters that our regulation will apply to. We are aware that CPs ('Communications

³³ <http://stakeholders.ofcom.org.uk/binaries/telecoms/ga/cvogc300710.pdf>.

³⁴ <http://stakeholders.ofcom.org.uk/binaries/telecoms/ga/complaints-handling-code.pdf>

³⁵ <http://consumers.ofcom.org.uk/2010/06/a-guide-to-telecoms-complaints/>

providers') currently use different definitions in their internal procedures and systems, and that many do not recognise a Complaint until it has been escalated within the company.

Our definition captures all expressions of dissatisfaction that are made to a CP, regardless of whether or not a CP subsequently decides to escalate the Complaint internally. The definition also captures all expressions of dissatisfaction regardless of the form in which the Complaint is made. However, we wish to signal that we would not expect CPs to comply with the Ofcom Code with respect to Complaints that are made in person, such as at retail stores. While CPs may wish to do so, it would be acceptable for such consumers to be asked to make a Complaint by another means.

The definition of a Complaint makes clear that it is the retail provider that has responsibility for appropriately handling a Complaint from a Complainant, regardless of whether the cause may be attributable to an underlying wholesale service.

For the avoidance of doubt, complaints about network faults are included within the definition of a Complaint. As complaints about network faults are currently eligible to go to Alternative Dispute Resolution ('ADR'), they should also be caught within these complaints handling obligations."

The Ofcom Approved Code of Practice for Complaints Handling states:

A Communications Provider (CP) must have complaints handling procedures that:

1) Are transparent:

a) A CP must have in place a written code for handling complaints ('Customer Complaints Code') made by their Domestic and Small Business Customers. A CP must comply with its Customer Complaints Code in relation to each Complaint it receives.

b) The Customer Complaints Code must be concise, easy to understand and only contain relevant information about complaints handling procedures.

c) The Customer Complaints Code must be kept up to date and as a minimum include information about:

i) the process for making a Complaint;

ii) the steps the CP will take to investigate with a view to resolving a Complaint;

iii) the timeframes in which the CP will endeavour to resolve the Complaint, including when the CP is likely to notify the Complainant about the progress or resolution of a Complaint;

iv) the contact details for making a Complaint to the CP, including providing details about the low-cost points of contact required in clause 2(c) below; and

v) the contact details for the CP's Alternative Dispute Resolution scheme, with details on when a Complainant will be able to access the service (with reference to the requirements on a CP in both clause 4(c) and 4(d) below).

2) Are accessible:

a) The Customer Complaints Code must be well publicised and readily available, including:

i) being easily accessible on a webpage, with either:

1. a weblink to the Customer Complaints Code being clearly visible on a CP's primary webpage for existing customers (i.e. '1 click' access); or

2. a weblink to the Customer Complaints Code being clearly visible on a 'how to complain' or 'contact us' page, which is directly accessible from a primary webpage for existing customers (i.e. '2 click' access).

ii) ensuring the relevant terms and conditions for a product and/or service refer to the existence of the Customer Complaints Code and should signpost consumers to how they can access a copy; and

iii) being provided free of charge to Complainants upon reasonable request in hard copy or other format as agreed with the Complainant.

b) Complaints handling procedures must be sufficiently accessible to enable consumers with disabilities to lodge and progress a Complaint.

c) The means by which a CP accepts Complaints should not unduly deter consumers from making a complaint. A CP must have in place at least two of the following three low-cost options for consumers to lodge a Complaint:

i) a 'free to call' number or a phone number charged at the equivalent of a geographic call rate;

ii) a UK postal address; or

iii) an email address or internet web page form.

3) Are effective:

a) A CP must ensure the fair and timely resolution of Complaints.

b) There must be clearly established timeframes and a clear and reasonable escalation process for dealing with Complaints.

4) Facilitate appropriate access to Alternative Dispute Resolution:

a) A CP must ensure front-line staff are fully informed of the right of consumers to use Alternative Dispute Resolution.

b) Every paper bill provided to domestic customers must include, in a reasonably prominent manner, relevant text regarding the right of consumers to take unresolved complaints to Alternative Dispute Resolution. Such text will:

i) provide the name of the Alternative Dispute Resolution scheme;

ii) make reference to the fact that the scheme offers dispute resolution, which is independent of the CP;

iii) make reference to the fact that the scheme can only be accessed eight weeks after a Complaint was first made to the CP; and

iv) make reference to the fact that consumers can utilise the scheme at no cost to themselves.

c) A CP must promptly issue a written Deadlock Letter when requested by a Complainant, unless:

i) the CP has genuine and reasonable grounds for considering that the Complaint will be resolved in a timely manner and subsequently takes active steps to do so; or

ii) it is reasonable to consider the Complaint to be vexatious; or

iii) the subject-matter of the Complaint is outside the jurisdiction of the CP's Alternative Dispute Resolution scheme.

d) A CP must ensure Complainants receive prompt Written Notification of their right to go to Alternative Dispute Resolution eight weeks after the Complaint is first brought to the attention of the CP, unless:

i) it is reasonable to consider the Complaint has been resolved; or

ii) it is reasonable to consider the Complaint to be vexatious; or

iii) the subject-matter of the Complaint is outside the jurisdiction of the CP's Alternative Dispute Resolution scheme.

5) Retain appropriate records of contact with Complainants:

a) A CP must retain written records collected through the complaints handling process for a period of at least six months including, as a minimum, written correspondence and notes on its customer record management systems.

All communications providers must provide an 'up to date Customer Complaints Code' which sets out the process for making a complaint and the minimum standards that the customer can expect when making a complaint. This Code must be well publicised and easily accessible to consumers. In the Panel's experience, some communications providers enable consumers to easily search for and find their Complaints Code. Others are less easily located.

Similarly stated target response times to acknowledge or resolve a complaint vary significantly and are in some cases aspirational rather than providing a firm deadline. We were concerned to note the rate at which some contact numbers (for complaints) were charged e.g. 5p per minute and 25p per call in two instances. While contact details for ADR services were given by all communications providers in their Codes, details for the escalation of complaints within a company were less consistent.

In February 2013 Ofcom opened a monitoring and enforcement programme to assess communications providers' compliance with Ofcom's complaints handling requirements (covered by General Condition 14.4) and to ensure that providers are making consumers aware of ADR. In August 2013, Ofcom announced that it had decided to extend this programme for a further six months.

If a consumer complaint reaches deadlock, or a dispute is older than eight weeks, the complaint can be referred to an ADR scheme. Communications providers must be signed up to one of the two accredited schemes: the Communications and Internet Services Adjudication Scheme (CISAS) or Ombudsman Services: Communications (OSC).

In recent years Ofcom has introduced measures to improve the ADR process:

- In 2010 the point at which consumers became eligible for ADR was reduced from 12 to eight weeks;
- In 2011 communications providers were required to follow an Ofcom Code of Practice on Complaints Handling (General Condition 14) to promote awareness of ADR; and
- In 2011 communications providers were required to proactively inform customers of their right to refer to ADR after eight weeks.

We note with interest the comments made by Ombudsman Services: Communications in its 2012/13 Annual Report³⁶: “The level of customer service offered by companies remains a significant driver of dissatisfaction. During 2012/13 over a third of communications complaints related to customer service (37%). We see a large number of cases where the company has misinterpreted the complaint and not addressed the issues that the complainant raised. In some cases, the complaint has not been fully investigated and when we review it we can find a rapid solution. Common examples include the company not allocating a payment to an account or customers not fully understanding their bills.”

“Customer service is the most common complaint about communications suppliers, so we advise participating companies to communicate clearly with their customers and keep them informed. They should call their customers back, respond to their letters, explain if there is a delay and, importantly, do what they say they are going to do.”

“Many cases are about a straightforward issue, perhaps a disputed bill or line fault, which escalates because the issue is not handled effectively. When the case reaches us, we not only try to resolve the complaint quickly, we try to explain how it could have been resolved earlier, before reaching us”.

Of the new contacts made to Ombudsman Services: Communications during 2012/13, approximately 20% were within its terms of reference. Of those contacts that were outside its terms of reference, 79% were premature and likely to return.

In relation to complaints that were within OSC’s remit, 81% were accepted after the eight week period while only 16% were accepted following a deadlock letter. It is interesting to compare these statistics across other sectors administered by Ombudsman Services: in energy, 72% of complaints were accepted after the 8 week period while 24% followed a deadlock letter and in property, 75% were accepted after the eight week period while 19% followed a deadlock letter. During 2012/13 the Service resolved more than 10,000 communications complaints. Following investigation, a remedy was required Ombudsman

³⁶ <http://www.ombudsman-services.org/downloads/OS%20Annual%20Report%202013.pdf>

Services: Communications in 85% of cases (in other words, in 15% of cases the outcome of the investigation found in favour of the communications provider).

4.2 Accreditation

Contact and call centres are a well-established feature of many businesses operations. The Customer Contact Association (CCA) is an independent accreditation body for call and contact centres' strategies and operations and it offers a 'Global Standard' accreditation³⁷. In partnership with Mental Health Helplines Partnership, CCA have also developed a Standard for helplines using the experience and expertise gained in developing CCA Global Standard©.

The CCA Standard is a set of key principles which have been defined and agreed by industry experts and stakeholders. First adopted in 2001 by brands across the UK and Ireland, the standard has been designed to increase the reliability and effectiveness of the customer contact operation.

Processes that meet the Global Standard should facilitate the provision of excellent customer service - which is reliant upon well-trained and informed contact centre staff. Strong internal planning and operational processes, supported by appropriate technology and systems and encompassing organisation-wide co-operation will deliver high quality end-to-end processes. Achieving a further training accreditation means that a business' processes and induction training programme uses a framework that represents industry best practice.

The Panel noted that Ofcom's own phone contact centre first achieved CCA accreditation in 2009 and both the written and phone team continue to meet this standard having undergone re-assessment in 2013. The Panel is both surprised and concerned that although some - but by no means all - providers are members of the CCA, none of the major telecommunications providers operating in the UK are listed as having this accreditation.

Similarly, we could find no reference to any communications provider having accreditation with the BS Standard ISO 10002³⁸ - the international standard for Customer Satisfaction complaints handling. This sets out a clear and easily understandable list of conditions that a complaints handling body must abide by to be accredited. The standard provides guidelines for putting in place a complaints management system - helping to identify complaints, their cause and how to eliminate them. The standard outlines management controls and processes that help to handle customer complaints more effectively and efficiently. Neither did we encounter any information that suggested that communications providers belonged to an alternative scheme of accreditation or quality assurance.

³⁷ <http://www.cca-global.com/gsx/content/awards/?contentid=112>

³⁸ <http://www.bsigroup.co.uk/en-GB/iso-10002-complaints-management/>

5 Conclusions and recommendations

Our research found that whilst customer service is improving over time a significant number of consumers are less than satisfied with their quality of service; that many customers do not complain when they have cause to; and that awareness and efficacy of escalation processes appear to be very poor.

In common with many other sectors, communications services are often provided by large, sometimes multinational, corporations. But unlike many other sectors, when things go wrong, an undue burden seems to fall on the consumer in respect of progressing the complaint and achieving resolution.

As the Panel's research highlights, for some people who don't contact their provider, this leads to them 'getting by' with a sub-standard service - for others contacting their provider leads to frustration with the people who are supposed to be helping them. The loss of time and money by consumers trying to get a problem addressed and the emotional perseverance required are rarely acknowledged by communications providers.

Particularly in the current economic climate, as businesses try to improve efficiency and reduce cost, there is a risk that they can become unduly focussed on fulfilling the business' needs, rather than those of the people they serve. We also recognise that the customer contact function can be partially or completely outsourced. This need not present a problem, but our research shows that it can be an impediment to meeting a customer's expectations or needs.

We do not believe that poor complaints handling is wilful; and the picture is not all bleak. Many communications providers are seeking to improve the way they handle complaints and are trying to prevent giving consumers the need to complain in the first place.

However, this report highlights that, irrespective of people's different characteristics, the consumer experience of contacting providers to make a complaint has recurring issues. For some consumers, the complaints system is simply not working, with a significant minority of consumers left feeling that they are 'going round in circles' and do indeed have a cause to complain.

The research finds there are three fundamental issues which can affect people's experience of the complaints process:

- Different people react differently to the same problem and the impact of the same problem will be different for different people - yet providers seem to have a systematic approach irrespective of the complaint or situation.
- Communications providers need to consider how their customer service can support an ageing population - more than 10 million people are now aged over 65 within the UK, and an estimated 19 million people will be over 65 by 2050. Currently, there is a risk that poor complaints handling has a disproportionate impact on older people, or people with a disability. The provision of information about service expectations, simple troubleshooting guides and clearly signposted and accessible

contact points would bring benefit to people who are less familiar with the technology or find difficulty using particular communication channels.

- There needs to be greater acceptance by communications providers that not everybody understands the technology. This is particularly important in the context of the move to a "digital by default" delivery of services; it is also of note that consumers retain a preference for telephone contact in many cases.

For many consumers, there is low awareness of what to expect from a service, where to find simple troubleshooting tips and how to escalate matters if a complaint is not resolved. In our view, the service provider is in the best position to provide this information which can be categorised into the following main areas:

- how do I know when I'm not getting the service I should expect?;
- how do I go about resolving any dissatisfaction and what should I reasonably expect?; and
- what do I do if I'm not happy?

For some in our research, the consumer experience: the level of emotional resilience required, the time taken to resolve a problem or complaint, the number of contacts required and the sheer level of persistence demanded of them to reach a resolution were just too great. This is simply unacceptable.

This research has highlighted to us how the first point of contact with a complaint/problem is crucial - so we would urge communications providers to put greater focus on complaints handling, including their escalation process. Although many providers have improved their procedures, we believe a greater emphasis is needed to ensure the right personnel, training, systems, resources and procedures are in place. This would then act as a vital tool of the business, helping to improve retention and sales.

We are conscious that it is important for those who complain to feel that their voice is being heard. We would encourage the sharing and promotion of useful tips and resources eg guides for consumers about how to complain. Turning to the consumer experience of contacting a provider, many of those interviewed during the research commented on the polite approach of the call handler, but a number of common issues were raised including:

- a lack of understanding of disability-related issues;
- a perception of a lack of expertise in the call centre employees and a reliance on scripted responses;
- the difficulty of establishing a shared understanding of the problem - or its possible resolution. In some instances a shared understanding was not reached because the consumers or call centre staff had strong accents, because staff used technical language the consumer did not understand or because the provider considered the problem resolved when the consumer did not; and
- frustration at having to repeat the problem and provide previous contact history at the beginning of each follow up call.

There are some simple solutions that communications providers should consider which, in the long run, will save costs by avoiding repeat contacts, rework and improving customer satisfaction. These include:

- logging full details of a complaint for ease of future reference;
- making clear how a complaint will be handled;
- keeping complainants informed about progress; and
- in certain circumstances, where there is a possibility of loss of service for the consumer, communications providers should look to offer a short-term 'temporary fix', e.g. call diversion.

The cost of both lodging a complaint and any required repairs was an area of concern for some of our participants. At present, under Ofcom's Code of Practice for Complaints Handling, communications providers are obliged to have in place at least two of the following three low-cost options for consumers to lodge a complaint:

- a 'free to call' number or phone number charged at the equivalent of a geographic call rate
- a UK postal address; or
- an email address or internet web page form.

To strengthen support for consumers and to ease contact, we would urge Ofcom to consider making all three options mandatory. We do not believe that any communications provider committed to good customer service would object to this.

The Panel notes that some providers charge for calls to their complaint line - and that this can become an issue for a greater number of consumers if they have to use an alternative handset to that supplied via their contract to contact their provider about the problem. Under new provisions to be introduced as part of the Consumer Rights Directive (CRD) in 2014, phone calls to customer helplines in relation to purchases should be charged at no more than 'the basic rate'. Although the CRD does not define 'basic rate', the underpinning principle is that charging the consumer extra to contact a trader over a problem with a product purchased is a hidden cost and that the consumer should not have to pay the trader additional money to exercise their consumer rights. Ofcom's proposed policy to make freephone (080) numbers free from mobiles as well as landlines will also be a significant improvement in relation to the charges some respondents incurred contacting customer service. But it will not resolve all the issues encountered in this research.

Our research highlights that contact by phone is the preferred option for many consumers wishing to contact their communications provider - the option which bears most risk of inflicting a financial burden on the consumer. We therefore urge communications providers to provide a freephone number that consumers can use that is accessible and free from both landlines and mobiles - regardless of the network provider used. We also feel that this is a key point for businesses and organisations to consider as we move towards 'digital by default' for a range of services.

In addition, there needs to be greater clarity up front by communications providers in relation to any associated cost of a fix that the consumer will have to bear. We believe that this can be an area of confusion and that the onus must be on communications providers to ensure clarity. Where there is a misunderstanding we would urge providers to give the benefit of any doubt to the consumer and waive charges.

As contact and call centres are a well established feature of many business operations, the Panel is surprised and concerned that none of the UK's telecommunications providers appear to have followed the example of Ofcom to achieve accreditation from the Customer Contact Association (CCA) or similar. The Panel urges communications providers to achieve independent accreditation to show commitment to, and help facilitate, excellent customer service.

Ofcom's Code of Practice underpins the complaint handling process and should act as an assurance from the communications provider that they are committed to assisting the consumer. We believe that Ofcom should continue to undertake occasional audits to examine whether obligations are being met under the Code of Practice.

Ofcom publishes complaints by sector and provider, as well as research into customer service satisfaction. We would encourage third parties, such as consumer-facing organisations and comparison websites, to incorporate this information into their offering to allow consumers to compare communications providers on their provision more generally and support a thriving competitive market.

The Panel was disappointed to discover that many consumers who participated in the research were unaware of their options to escalate their case, either within the provider or by way of recourse to an ADR scheme. In addition to a lack of awareness of this option, an additional barrier to escalation was that consumers felt the onus was on them to provide the relevant data, and without it they were left feeling that they could not pursue a formal complaint through ADR avenues. It is imperative that consumers are made aware of their rights, and earlier in the process, particularly in respect of ADR. To this end all stakeholders and consumer-facing organisations can assist consumers by providing guidelines, signposting and information about the complaint process.

Given the speed of modern communications and consumers' reliance on their communications services, we consider that eight weeks seems too long to wait, especially if a complaint has already taken some effort to pursue. We would therefore encourage the serious consideration of a shorter complaint duration time before a complaint becomes eligible for the ADR schemes.

The research also noted that, although switching suppliers had been considered by some consumers whose problem had not been resolved or remained unhappy with the outcome, many felt that this was not a viable option. Reasons for not pursuing this route included financial, negative expectations of the switching process and negative perceptions of the communications marketplace. Interestingly, some participants in the research who were with a cheaper supplier expected a lower level of service.

The Panel believes that when people can switch between providers quickly and easily, consumers will benefit from enhanced competition in the communications markets as well as better service levels. Consumers need to be aware of the potential benefits of switching and to have confidence that switching will be a hassle-free process with effective “safety nets” to mitigate against loss of services. The provision of clear information about contract terms, dates and penalty clauses for consumers and robust switching processes are the bedrock of this, but they are not sufficient by themselves - consumers need to be assured that they will not incur excessive cost, time or disruption as a result of a decision to switch.

The market now offers a range of bundled services, which means that switching between providers with a bundle is even more complex - and risks leading to reduced competition and fewer consumers than would otherwise be the case exercising choice in the market. The Panel has encouraged Ofcom to press ahead with its review of switching across services, including mobile and bundled services and to take steps to implement a harmonised and unified switching process in all communications markets as swiftly as possible.

The Panel’s research highlights areas where consumers would significantly benefit from a renewed focus from communications providers. The Panel was particularly concerned to learn of the experiences of some older consumers and those with a disability who seemed to be at a particular disadvantage in their dealings with providers.

Following the issues highlighted by the research, and our own subsequent exploration of the issues, we make the following recommendations in five key areas:

- **The provision of information**
- **Review and strengthen contact centre staff training**
- **Improving the consumer contact experience**
- **Provide greater support for older and disabled consumers**
- **Review and strengthen escalation and ADR referral processes**

1. The provision of information

- a) Communications providers should provide better, jargon-free information for consumers about:
 - service expectations;
 - simple troubleshooting;
 - clearly signposted and accessible contact points;
 - information about the complaint process/easy to follow process maps etc.
- b) Communications providers’ tone (written and verbal) should reassure consumers that seeking to resolve problems is a positive action and they should welcome the opportunity to improve their own performance.

- c) We would encourage third parties, such as consumer facing groups and comparison websites, to use independent customer service ratings. These would be valuable for consumers looking to choose or switch provider.
- d) All stakeholders, including consumer-facing organisations such as comparison websites, could assist by:
 - o explaining how best to make a complaint;
 - o what might constitute a problem;
 - o who to contact for different issues;
 - o providing guidelines/letter and email templates;
 - o information about what is a reasonable resolution;
 - o how to escalate an issue; and
 - o promoting the potential benefits of pursuing a complaint.

2. Review and strengthen contact centre staff training

- a) Communications providers should review their training plans to ensure that staff have a clear understanding of the end to end complaints procedure, including ADR.
- b) Communications providers' staff should:
 - o be able to establish a shared understanding of the problem with the consumer;
 - o have relevant technical expertise;
 - o be able to explain technical terms in layman's language;
 - o go 'off-script' if necessary;
 - o be empowered to take ownership of complaints; and
 - o have the ability to look at alternative options or feel able to escalate the problem earlier in the process.

3. Improving the consumer contact experience

Significant steps can be made by communications providers to improve the contact experience. Areas for review include:

- a) Process - Communications providers should:
 - o maintain better records, which incorporate clear details of previous conversations with the consumer including a staff name (which should be given to the consumer both at the start and end of each contact);
 - o provide information about how a complaint will be handled, which is accessible to the consumer and all the communications provider's call centre staff;

- provide consumers with a unique reference number and firm timescales;
 - call back when promised and build time into schedules to provide updates and follow-ups;
 - supply consumers with a free copy of their complaint records quickly and easily;
 - take into account consumers' apparent preference for telephone contact for particular issues and that some disabled consumers have particularly strong contact mode preferences, such as face to face. This is also of relevance for Government service provision as it moves towards 'digital by default' and designs assisted digital provision; and
 - we would encourage the exploration of virtual assistance for those who are able to access it and the option for people to email 'live chat' sessions back to themselves as a record.
- b) Cost to the consumer - communications providers should enable consumers to:
- contact their supplier at a minimum via a freephone telephone number, email and post;
 - have greater certainty in relation to the cost of repairs - communications providers should give much clearer information about potential call out charges, and the circumstances under which a charge will be applied;
 - Access short-term workarounds - in limited circumstances communications providers should provide e.g. call diversion or temporary fixes of a similar standard to the affected service such as a replacement handset;
- c) All communications providers should undertake relevant customer service accreditation and place greater value on customer service quality as a competitive feature. They should promote this to existing and potential customers; and
- d) Ofcom should continue to conduct occasional audits to check whether communications providers are meeting their obligations as set out in the Code of Practice.

4. Provide greater support for older and disabled consumers

- a) Communications providers should:
- Signpost people with severe hearing or speech impairments to their preferred contact method from a range including e-mail, SMS, text phone and text relay or video relay services³⁹;

³⁹ 62,000 people registered for access to emergency services via SMS by Aug 2013. In 2013, Ed Vaizey, Minister for Culture, Communications and Creative Industries wrote to more than 80 FTSE companies engaged with customer services to encourage them to communicate with their deaf and hard-of-hearing customers through a mix of more suitable contacts, be it by e-mail, SMS, text relay, Typetalk or video relay services—VRS. In the 2011 Census, more than 20,000 people in

- if they are not already doing so, follow appropriate guidelines in respect of handling calls from disabled customers⁴⁰; and
- instil a greater awareness of disability-related issues among their workforce and ensure their processes are accessible to all their customers. Consumer equipment should provide information in an easily accessible format, including labelling e.g. serial numbers or codes on broadband hubs.

5. Review and strengthen escalation and ADR referral processes

- a) Communications providers should:
 - review and strengthen their escalation processes and staff awareness of them to make them more effective; and
 - ensure that consumers are aware of their rights, particularly with regard to the use of ADR, early in the process.
- b) Ofcom should independently review the efficacy of, and access to, escalation procedures across the industry.
- c) Ofcom, the ADR schemes, industry and consumer advocates should undertake serious consideration of a shorter complaint duration time than eight weeks before consumers can approach the ADR schemes.

England and Wales gave sign language as their main language. For those who have difficulty with written or spoken English, video access with a sign interpreter may be the appropriate adjustment.

⁴⁰ <http://consumers.ofcom.org.uk/files/2010/05/callcentres.pdf> and Business Disability Forum: http://businessdisabilityforum.org.uk/uploads/files/YCIITU_generic_2010.pdf