

20 June 2013

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Dear Jo

### **Consumer Interest Toolkit**

The purpose of this letter is to report on various initiatives within Ofcom to ensure that citizens and consumers remain at the heart of everything we do. It marks the conclusion of a piece of work we have been carrying out to look at Ofcom compliance with the principles in the Consumer Interest Toolkit.

Ofcom's principal duty is to further the interests of citizens and consumers, and the Communications Consumer Panel exists to advise Ofcom and other bodies on consumer interests.

In 2004, the Panel came to an important conclusion, which was that Ofcom needed a systematic way to think about the citizen and consumer interest when making policy, and to ensure that this was recorded. The result was the Consumer Interest Toolkit, which was published in 2006. The Panel subsequently arranged for an 'audit' of three Ofcom projects against the principles in the Toolkit, and the report of this was published in 2008.

We are grateful to the Panel for commissioning the Toolkit, which has challenged us to consider every aspect of Ofcom's work.

The Consumer Interest Toolkit remains relevant today and provides valuable guidance about the actions Ofcom should take to ensure that citizen and consumer interests remain at the heart of everything we do.

### **How does Ofcom identify the consumer interest?**

Ofcom draws on a wide range of sources in order to identify the consumer interest.

A rich source of data is complaints from consumers to our Consumer Contact Team. But not everyone has heard of Ofcom, or has the courage or the ability to complain. So we also have an active programme of engagement with consumer groups in order to listen to their views. Some of these represent particular groups of consumers, such as those with disabilities or who are elderly, and some are more general in nature. We also commission a wide range of market research, both one-off studies and longitudinal surveys.

The interests of consumers are not always the same as those of industry. And as the Panel reminds us, some elements within industry are well-resourced and powerful, unlike most consumers, or even most consumer groups.

### **The recent review**

In 2012, the Consumer Policy Team commenced a review of Ofcom's compliance with the guidance in the Consumer Interest Toolkit. We were keen to examine whether we were complying with the spirit, as well as the letter, of the Toolkit.

The Toolkit poses 31 questions for Ofcom, some relevant to policy projects and some to the organisation as a whole. The project team carried out a gap analysis of Ofcom's work and processes using these 31 questions as a framework.

We found that Ofcom could give positive answers to all the 31 questions in the Toolkit. However, although we considered that we were broadly compliant, the review did identify some areas for improvement, largely centred on refreshing existing resources, creating clearer documentation and ensuring that appropriate resources and training are available to colleagues.

We have made a number of changes that address these issues and have embarked on a programme with colleagues to communicate these and to remind them of the importance of citizen and consumer issues, the guidance available to project teams, and the need to consider these issues in all our policy work.

Some examples of recent changes include:

1. Documents offering guidance to project teams on citizen and consumer issues have been updated and are located centrally on Ofcom's intranet.
2. Activity planning templates have been updated. For example, there is now a prompt for project managers to consider publishing Plain English summaries of external documents.
3. Materials have been published on Ofcom's intranet to make all colleagues aware of the changes and the new location for guidance on citizen and consumer issues.
4. All project managers and directors have been e-mailed directly to notify them of the changes.
5. The project team are communicating the changes in person at internal meetings throughout May and June to brief colleagues and answer questions. The team will proactively make itself available to individual teams throughout the organisation to reinforce this.
6. The "Introduction to Citizens and Consumers" training course has been run a number of times and more sessions are scheduled. This course has been found valuable both by new joiners and as a refresher for existing colleagues.

### **Other initiatives to benefit citizens and consumers**

Since the Toolkit was first published, there have been other Ofcom initiatives to benefit consumers and citizens, many of which have been encouraged and supported by the Panel.

- Since 2011 we have published quarterly data about complaints we receive.
- We also publish the annual Consumer Experience report, which draws on a wide range of research and data to scrutinise how well communications markets are delivering for consumers.

As well as identifying the consumer interest, it is important that we record how we have done this. Ofcom's reporting procedures enable us to record how consumer interests are taken into account, throughout the lifetime of a project. This is particularly important for projects

where consumer outcomes are not the specific issue being addressed, but where the effect of our decisions has the potential to have a profound impact on consumers.

There is no doubt that consumer interest is easier to see in some policy projects than in others. The Toolkit challenges us to consider this in all projects, if necessary by using different evaluation methods.

It is important to note that this is about better processes, not more processes. And of course is it much more than just process - we want to be certain that Ofcom's organisational culture reflects the principles in the Toolkit.

### **Where this work sits within Ofcom**

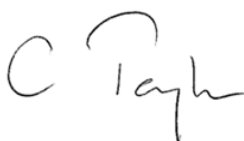
Ownership of this work lies with the Consumer Affairs team, part of the Content, Consumer and External Affairs Group. The CCEA Group largely governs and oversees the way Ofcom identifies citizen and consumer issues and how it engages with various stakeholder bodies. However, taking account of the consumer interest is important for every Ofcom colleague, not just those in Consumer Affairs. The Toolkit is about embedding the consumer interest in everything we do, not just in the work of the Consumer Affairs team.

### **Conclusion**

In conclusion, we believe that the Toolkit has helped us shape Ofcom's culture as well as our practice, and we are pleased that this was borne out by our recent internal review. We believe that the Toolkit has brought significant benefit to citizens and consumers and will continue to do so in years to come.

We are glad of the opportunity to report on this work to the Panel.

Yours sincerely

A handwritten signature in black ink, appearing to read 'C Taylor'.

Chris Taylor

cc Fiona Lennox, Claudio Pollack, Katie Hanson