

Communications Consumer Panel and ACOD response to the Older Peoples' Commissioner for Wales consultation on how to make Wales the best place in the world to grow older

The Communications Consumer Panel and our work for older people

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

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

The Panel pays particular attention to the needs of older people and disabled people, the needs of people in rural areas and people on low incomes, and the needs of micro businesses, which have many of the same problems as individual consumers. Our responses relate directly to consumers the communications sector, which covers landline and mobile telephony, broadband, television, radio and postal services. Due to convergence in the market, this sector is sometimes just referred to as 'telecoms'.

The Panel has a representative from each nation and the current member for Wales is Karen Lewis. Karen is able to represent the specific needs of people living in Wales.

Access to communications services

An important facet of helping older consumers to stay informed in relation to their communications services is the measures that communications providers are required to adopt to assist consumers who have additional access needs (such as requiring bills etc printed in large type) or who are in vulnerable circumstances.

It is difficult for older consumers to stay informed and make their voices heard if they cannot access communications services. Ofcom's [Connected Nations Report 2018](#) found that:

- Around 3% of premises in Wales cannot access a decent fixed broadband service that delivers a download speed of at least 10Mbit/s and upload speed of at least 1Mbit/s.
- 93% of homes and businesses in Wales are in areas where superfast, or better, broadband is available, but only 38% of homes are using these services. This is the lowest take-up in any of the UK nations - Northern Ireland 45%, England 44%, and Scotland 40%.
- 10% of Wales' landmass has no good 4G coverage from any operator. This has improved from 22% a year ago but rural areas are still badly affected.
- 31% of homes and businesses in Wales do not have good indoor 4G coverage from all operators.
- We also estimate that there are 7,000 homes and businesses in Wales that cannot access a decent fixed broadband service or get good 4G coverage.

We encourage the Commissioner to press for greater high quality mobile and broadband coverage across Wales in order to help older consumers to stay connected and to access the services that they need.

Digital inclusion/including older people who are not online

The latest National Survey for Wales (2017/18) shows that in Wales make up the largest segment of people who are not online are senior citizens. With 75% of digitally excluded people being over 75 and only half of single pensioner households (51%) having access to the internet, we see this as an area that the Commissioner should have in her focus. Initiatives are in place to tackle this exclusion, such as the Digital Companions scheme¹, delivered by Digital Communities Wales.

As responses to this consultation are required via an online form, we would encourage the Commissioner to seek the views of older people who are not online, using her legal authority to enter premises other than private homes to interview older people (with their consent).

Helping older consumers get better deals

Affordability of communications services is a key way to ensure that older people can afford to do things that they want - and need - to do. The Commissioner should focus on measures to keep services affordable for consumers, particularly for older people who do not necessarily access services that attract the best deals. We have recently responded to ongoing Ofcom consultations on [end of contract and out of contract notifications](#) and [mobile handset contracts](#). In our responses we underlined the need to ensure that older people are not victims of a loyalty penalty due to their nervousness around switching communications supplier. We also highlighted that communications from suppliers should not create anxiety among older consumers and as such should be written in clear, plain language and should not be unduly persistent. We feel that this in an important way of ensuring that older consumers are able to stay informed.

Complaints and Alternative Dispute Resolution (ADR)

Our research '[Still Going Round in Circles](#)' shows how difficult, particularly vulnerable and older, consumers find making complaints with communications providers. Communications providers need to make sure that their contact centre agents and retail staff are able to communicate with older people about technology in plain language. The above research showed that many of the participants, particularly people over 65 felt belittled or were unable to speak on the same level as contact centre agents, due to the agents working from scripts or using jargon. We would imagine that this could be even more challenging for people whose first language is not English, but we have no evidence on that.

Ending ageism and discrimination

More engaged consumers are more likely to benefit from the best deals on offer. Older people have been shown by Ofcom to be less likely to switch provider and therefore they are generally less engaged, making them more susceptible to harm. The Panel raised

¹ <https://wales.coop/digital-companions-scheme-to-help-millions-of-welsh-seniors-access-essential-online-services/>

concerns about consumers who were paying for a landline-only (without broadband). Ofcom looked into the treatment of this group of people as part of its Standalone Landline Market Review and found that that people subscribing to a landline-only tariff were much more likely to be older and less likely to have access to the internet. We supported Ofcom in approaching BT to introduce a reduction in the costs to these people, whose charges had been steadily increasing, against a backdrop of decreasing wholesale charges, saving them £7 per month.

We encourage the Commissioner to work with Ofcom to support measures to ensure that consumers receive fair deals from their communications providers and are supplied with services in a way with which they are able to engage. There is a dedicated Ofcom Wales office in Cardiff Bay and we encourage the Commissioner to make contact with the Director and her staff there.

Scam and nuisance calls

The Panel monitors the reported volumes of nuisance and scam calls and texts, which can contribute to the financial abuse of older consumers. Such calls can also create a feeling of unease in the home and a fear of engaging with legitimate third parties over the phone.

We strongly supported moves by Ofcom to ensure that communications providers offer consumers caller identification services free of charge, as can be seen in our [consultation response](#) on this issue.