



The Work of the Communications Consumer Panel and the Advisory Committee on Older and Disabled People

2015-16

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Foreword

The last year has seen much activity and debate in the fast changing communications environment. It is a momentous time for the industry, and we have seen a number of consultations and calls for input, on a range of issues which will shape the communications landscape for many years. This offers an important opportunity for the Panel and ACOD (Advisory Committee for Older and Disabled People) to put the perspectives of consumers and micro businesses at the heart of the debate.

Broadband and mobile coverage and quality of service have been, and continue to be, at the forefront of this agenda. Nuisance calls, digital engagement, privacy and security of personal data, customer service and complaint handling, are other very important topics where the Panel and ACOD have been instrumental in ensuring that the voices of consumers, citizens and micro businesses are heard.

Our starting point is always: “What is the scale of the issue for consumers, citizens and micro businesses? And can the Panel and ACOD make a difference?” We then organise our work by focusing on key areas of engagement, whilst keeping a wider range of topics under review, following the debate and progress, and contributing with expert advice and constructive challenge.

Advocating for those who are more vulnerable or whose voices are not usually heard within the industry, and working with communications providers, Ofcom and other industry stakeholders, are valuable and important roles of both the Panel and ACOD. We use research to inform our work, commissioning our own where necessary. In 2015 we published [We're Not All the Same! Inclusive Communications: Helping older and disabled people to get more from their communications services](#). Our research highlighted ways in which communications services mitigate some of the potentially disempowering effects of age or disability. However, it also showed that customer service issues can cause disproportionate problems and frustrations, that there are still barriers to inclusion and that there is a lack of awareness of disabled people's rights to equivalent access. In particular, the report has helped raise the profile of the measures for disabled end-users that apply to anyone who provides an electronic communication service or network, and was welcomed by communications providers.

I believe we are making a difference. We have seen real progress this past year across a number of areas including: initiatives to help fight against the scourge of nuisance calls; changes to consumer service; provision for more vulnerable consumers; better consumer information; and moves to place the consumer and citizen voice even closer to the heart of policy making. Collaboration, constructive challenge and clarity of purpose remain central to our approach. We will continue to ensure that the interests of consumers, citizens and micro businesses are protected and promoted, so that the emerging communications arena is inclusive and fair, and so that the market succeeds in meeting the needs of us all.

Jo Connell OBE DL - Chair, Communications Consumer Panel and ACOD

About the Panel and ACOD

The Panel's objective is to:

"... protect and promote the interests of consumers, citizens and micro businesses in the communications sector by giving advice to Ofcom, the EU, Governments, industry and others."

The Communications Consumer Panel consists of eight independent experts. Established by the Communications Act 2003, the Panel carries out research, provides advice and encourages Ofcom, governments, the EU, industry and others to look at issues through the eyes of consumers, citizens and micro businesses. We pay particular attention to the needs of older people and people with disabilities, the needs of people in rural areas and people on low incomes, and the needs of micro businesses, which face many of the same problems as individual consumers.

The Advisory Committee on Older and Disabled People, ACOD, advises Ofcom about the interests in the communications sector of older and disabled people living in the UK. Cross-membership of the two bodies was established in Summer 2012. Four members of the Panel also represent the interests of consumers and citizens in England, Northern Ireland, Scotland and Wales. Topography and population distribution vary across the Nations, thus each present different challenges but, at the same time, similar problems with communications services can have varying impacts and levels of detriment in different Nations. Our National Members liaise with key stakeholders in the Nations to understand the perspectives of consumers and citizens in all parts of the UK and input these to the Panel's consideration of issues. They also attend meetings of the Ofcom Advisory Committee for each Nation so that there is a two-way communication of ideas.

The Panel ensures that the consumer and citizen voice is heard on a broad range of issues, which we address in three main ways:

- Key areas of engagement: proactively pushing issues up the regulatory or policy agenda, or seeking changes in policy;
- Research: stimulating and influencing debate, and informing our policy advice and the work of others;
- Keep under review: the Panel keeps many other issues under review - particularly where we have previously raised concerns and stimulated action - and intervenes where appropriate.

The Panel is highly cost effective, operating on a small annual budget. We remain based at Ofcom's offices so have low overheads. Where appropriate, Ofcom shares data and research with us, so that the Panel need only undertake research in carefully targeted areas where we identify a need for a specific consumer perspective. We meet monthly but conduct much of our work electronically.

Panel activities

The Panel's job is to ensure that the communications sector works for consumers, citizens and micro businesses, and in particular the more vulnerable in society: which may include older people, disabled people and indeed anyone who finds themselves in a vulnerable situation. We have a unique relationship with Ofcom. Sometimes described as a 'critical friend' to Ofcom, the Panel provides robust and independent advice that is constructive, realistic and cognisant of the trade-offs which regulatory decisions may sometimes involve. This is made possible by the fact that Ofcom shares information and ideas in confidence with the Panel at the beginning of regulatory processes, before consulting formally with other stakeholders. This unique position enables us to give strategic advice on policies early on in their development, as plans are being formulated, so that consumer and citizen interests can be built into Ofcom's decision-making from the outset.

Our single sector specialism generates and sustains a focus and expertise so that we can challenge in a constructive environment, offer comprehensive advice, and influence the development of policy in a timely way. Attendees at Panel meetings realise that it is a place for robust, informed debate but with the over-riding intention to help Ofcom and other stakeholders deliver better policy and outcomes - for individual consumers, citizens, micro businesses and ultimately for the UK economy and society.

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

We have a small budget for research and focused use of this has contributed evidence and insight to Ofcom's and others' work. For example, our *Going Round in Circles*¹ research continues to inform Ofcom's work in relation to communications providers' complaints and Alternative Dispute Resolution (ADR) referral systems, and our *Inclusive Communications*² research has ignited a debate with Government departments, Ofcom, third sector organisations, and businesses about how communications providers can best support customers with additional communication support needs, such as people with disabilities, and older consumers. Communications providers have also told us that these reports are of huge value to them. Our understanding of the industry allied to our focus on consumers enable us to deliver in-depth analysis that move the debate forward in a constructive and informed manner.

Our activity is often behind the scenes, shaping policy as it is just starting to develop; and outcomes are often long term. Sometimes we can see that we have clearly affected a change in policy - for example, BT agreed to change its BT Privacy renewal practices after we raised concerns about its fairness to consumers.

¹ <http://www.communicationsconsumerpanel.org.uk/going-round-in-circles/going-round-in-circles>

² <http://www.communicationsconsumerpanel.org.uk/research-and-reports/we-re-not-all-the-same-inclusive-communications>

But in terms of evaluating our impact and our role, we also greatly appreciate the feedback we get from our stakeholders on various areas where we had given input or raised concerns and challenges including:

“The Board very much values the independent and expert input from both the Consumer Panel and ACOD and look forward to working with you over the coming year. Your ability to hold Ofcom to account in these areas is important.”

Dame Patricia Hodgson, DBE, Ofcom Chairman

“The Panel’s research is useful as it allows us to look at the accessibility issues behind the headlines and causes of complaints.”

EE

“Your clear and strong voices for the consumer interest are an invaluable part of the industry landscape...”

Digital UK

“The Panel’s research had been useful in allowing us to make a case to make changes within the business - where there is the desire to change, evidence provides a gateway”

Talk Talk

“The Panel’s research and recommendations are valuable as insights into real life issues, enabling changes to be made to processes”

3

The changing nature of telecoms

In our consultation responses over the past year we have highlighted the changing nature of the telecoms sector and how consumers’ use of fixed internet and mobile voice/data has changed significantly.






Ofcom’s 2015 Communications Market Report highlighted the fundamental role of telecoms to many people’s lives. Seven in ten (69%) internet users agree that ‘technology has changed the way I communicate’ and six in ten (59%) agree that ‘new communication methods have made my life easier’. Digital communications are seen to bring benefits. Almost two-thirds (64%) of online adults agree that being online is ‘invaluable for keeping me informed about current issues’, and six in ten (60%) agree that it helps them keep in

touch with close family and friends. Just over half (52%) agree that it ‘inspires me to try new things’.

Market Consolidation in the mobile market is an issue of interest to the Panel in the context of consumer impact. We wrote to the European Commission³ and the Competition Markets Authority⁴ to highlight our concerns relating to the proposed mergers of BT and EE and Hutchison 3G and O2, stating that the position of all UK telecommunications consumers must not be weakened in any way by the desired acquisitions. We believe the consumer should be at the heart of a competitive market and the Panel raised its concerns that a reduction of players in the communications market risked diminishing competition, consumer choice and service provision. The Panel maintained its concerns that the proposed mergers might have led to greater tie-ins or hard to exit contracts. To ensure that consumers’ interests remain central to the operation of a successful competitive market, we stated that individual mergers could not be viewed in isolation.















Influencing the debate - consultation responses








The Panel’s output is high and encompasses a wide variety of activities and topics. We strive to ensure that a range of organisations take account of and understand the consumer perspective; we respond to a wide variety of consultations; and we inform and stimulate debate by organising or presenting at a number of events and working with a wide range of partners. On average the Panel responds to two consultations or discussion documents per month, in 2015/16 our responses have included:

- [Response to Citizens Advice and Citizens Advice Scotland draft workplan](#) March 2016 
- [Response to Ofcom's draft Annual Plan 2015/16 and Ofcom's Chairman's response](#) March 2016 
- [Communications Consumer Panel and ACOD's response to Ofcom's 'Review of how we use our persistent misuse powers: Focus on silent and abandoned calls'](#) February 2016 
- [Communications Consumer Panel and ACOD response to DCMS in relation to requiring direct marketing callers to provide Calling Line Identification](#) February 2016 
- [Communications Consumer Panel and ACOD comments to the European Commission in relation to the proposed merger between H3G and O2](#) January 2016 

³ www.communicationsconsumerpanel.org.uk/downloads/comments-to-commission-re-proposed-mno-merger.pdf

⁴ <http://www.communicationsconsumerpanel.org.uk/downloads/cma-bt-ee-merger-prelim-comments-180315.pdf>

- [Communications Consumer Panel and ACOD response to DCMS' call for inputs into a new digital strategy for the UK](#) January 2016 
- [Communications Consumer Panel and ACOD response to the House of Commons Science and Technology Committee call for evidence in relation to Digital Skills](#) January 2016 
- [Communications Consumer Panel and ACOD response to Ofcom's consultation on access service targets for non-domestic channels](#) December 2015 
- [Communications Consumer Panel and ACOD response to the Commission's evaluation and review of the regulatory framework for electronic communications networks and services](#) December 2015 
- [Panel and ACOD submission to the CMS Committee Inquiry: Establishing World Class Connectivity Throughout the UK](#) Nov 2015 
- [Communications Consumer Panel and ACOD response to Ofcom's consultation What's on the telly? Proposed improvements to EPG accessibility for people with visual impairments](#) Oct 2015 
- [Communications Consumer Panel and ACOD response to the discussion document related to Ofcom's Strategic Review of Digital Communications](#) Oct 2015 
- [Communications Consumer Panel and ACOD response to the BBC Charter Review Public Consultation](#) Oct 2015 
- [Communications Consumer Panel and ACOD response to the DCMS' EU Electronic Communications Regulatory Framework: Post Implementation and Forward Looking Review](#) Oct 2015 
- [Communications Consumer Panel and ACOD response to Ofcom's consultation on Consumer Switching: Consumer experience of switching mobile communications services and options for process reforms](#) Oct 2015 
- [Communications Consumer Panel and ACOD response to PhonepayPlus' discussion document on vulnerability](#) September 2015 
- [Communications Consumer Panel and ACOD response to Ofcom's consultation on revising the penalty guidelines](#) September 2015 
- [Communications Consumer Panel and ACOD response to Ofcom's discussion document on its review of the regulation of Royal Mail](#) September 2015 
- [Communications Consumer Panel and ACOD response to Ofcom's consultation on an Approval Logo for the metering and billing scheme and a modification to the Ofcom metering and billing direction](#) August 2015 

- [Communications Consumer Panel and ACOD response to DCLG and DCMS' Review of how the planning system in England can support the delivery of mobile connectivity](#) August 2015 
- [Communications Consumer Panel and ACOD response to call for evidence - Improving Mobile Communications for UK Rail Passengers](#) July 2015 
- [Communications Consumer Panel and ACOD response to BIS' call for evidence on the protection of micro and small businesses in purchasing products and services](#) June 2015 
- [Communications Consumer Panel and ACOD response to Citizens Advice's review of the consumer codes](#) June 2015 
- [Communications Consumer Panel and ACOD response to the terms of reference for Ofcom's Strategic Review of Digital Communications](#) May 2015 
- [Response to Ofcom's letter to stakeholders on its review of the regulation concerning complaint handling and dispute resolution in the postal market](#) April 2015 
- [Response to the Extra Costs Commission's consultation on its Interim Report on the extra costs faced by disabled people](#) April 2015 

Review of Ofcom's consultation process

Reflecting the consumer and citizen voice in policy development and decisions is vital - and yet hard to achieve effectively.

So to help ensure that as wide a group of consumer and citizen stakeholders as possible could input into Ofcom policy development, we set up a sub-group of the Panel, joined by two external stakeholders, to undertake a review of how Ofcom consults - in the widest sense.

We have been pleased to see some of the approaches we recommended being used subsequently and look forward to their continued use - particularly around the promotion of consultations and the acceptance of consultation responses in alternative formats.

One of the key recommendations from the Panel was for Ofcom to create a consultations mailing list, to enable interested parties to be notified of consultations it has underway. We're delighted that Ofcom has now established such a mailing list which we hope will be useful for people to keep up to date with the issues that Ofcom is consulting on. Interested parties can sign up to the consultations update mailing list at: <http://www.ofcom.org.uk/emailupdates/Consultations>

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2015/16 work areas

The pivotal role of communications to people's lives, and the need to ensure that digital connectivity is available to all, has heavily influenced the areas of work we have chosen to focus on. As described in our published workplan, we undertook a range of work centred on the following key areas of engagement and research projects:

Key areas of engagement

- Broadband/mobile coverage and quality of service
- Nuisance calls, scams and ease of reporting
- Treating consumers fairly and customer service
- Privacy and security of personal data
- Digital engagement/detriment
- Micro businesses' experience of communications

Research

- Digital Footprints - the use of personal data
- Inclusive communications

Review

- Affordability and debt
- Consumer implications of changing industry structure
- Consumer Information
- PSB Review
- Mobile Payments
- Non-geographic calls
- Post
- Switching
- Spectrum Strategy
- Traffic management

Additional ACOD specific work areas

- Inclusion and Accessibility
- Portrayal and participation

Key areas of engagement

Broadband/mobile coverage and quality of experience

As noted above, every year consumers, citizens and micro businesses become more reliant on communications services. With this in mind our view remains that any sub-optimal delivery of those services has a more pronounced effect on users. Poor service, in any shape or form, is not just a cause of irritation for individual consumers and micro businesses - it is an issue of real and significant detriment.

Connectivity is required that is always on, secure, high quality and ubiquitous

The Panel's driving force continues to be our belief that, given the increasingly central role of communications in people's lives, society and the economy, it is vital to support fully the communications needs of all consumers, citizens and micro businesses. To support consumers' and businesses' needs connectivity is required that is always on, secure, high quality, seamless and ubiquitous. These needs include areas such as financial dealings; electronic payments for goods and services; access to digital services; health services; digital privacy; Government services and so on. And on the not too distant horizon, the Internet of Things and increasingly connected cities will mean that communications become ever more important as the lifeblood of human activity and wellbeing.

We believe that the ambition should be for mobile and broadband coverage to be truly universal - and for mobile coverage to relate to both indoor and geographic coverage, as well as roads and rail.

This year we have worked on a number of fronts - engaging with MPs, responding to consultations, and working directly with Ofcom, Government departments and the EU, to encourage policy-makers to consider the needs of all consumers in policy making, regardless of their current level of engagement with the market.

We believe that the ambition should be for mobile and broadband coverage to be truly universal - and for mobile coverage to relate to both indoor and geographic coverage, as well as on roads and rail.

Our extensive responses to both Ofcom's Strategic Review of Digital Communications (DCR)⁵, the European Commission's Review of the Telecoms Framework⁶ and DCMS's Consultation on the Framework⁷, enabled us to continually highlight consumer needs, not least: availability and access to the full range of communications services for the whole population; high standards of coverage, speed and reliability; and excellent customer service and complaint handling systems.

Our responses noted the Panel's belief that the cornerstone of a successful telecommunications sector will be a combination of availability, accessibility, affordability, reliability, innovation and trust. Such a market should innovate, improve service standards, offer uncomplicated choice and give good value for consumers.

However, market failures do happen, for example, mobile coverage is not optimal, people do not have certainty about the exact broadband speed that they will receive, and too many people are unable to enjoy a reliable broadband service. When the market does fail its consumers in these ways we believe that the regulator must be flexible and agile enough to act quickly and decisively, so that consumers' and citizens' interests are both protected and promoted.

Despite the developments in superfast broadband and mobile coverage, we noted that there is still some way to go and it is vital that consumers and citizens in the widest sense should not be left behind, left out or left wanting. Excellent network coverage and call quality combined with the provision of better information will help people make better choices, and make greater use of the functions and applications that they want, which in turn we believe will drive up service levels and ensure that a thriving competitive market benefits all stakeholders.

We have emphasised that telecommunications are now rightly regarded as the fourth Utility, but in direct contrast to many utilities, there are multiple suppliers who interact with consumers, both residential and business. For consumers to be truly empowered there has to be an integrated approach - a holistic understanding of consumers' needs underpinning pragmatic solutions at every level - ranging from the regulatory approach to providers' direct support of people's increasingly complex setups.

Our responses emphasised how voice, text, and at a rapidly increasing pace, data, are all central aspects to people's lives both collectively and individually. People have every right to expect to have the ability to receive mobile coverage indoors and out, on roads and rail, and to move seamlessly from network to network and from device to device. The line between personal and business use of communications will become ever more blurred - any ultimately irrelevant - and connectivity on demand will be an everyday expectation.

⁵ <http://www.communicationsconsumerpanel.org.uk/downloads/dcr-response-final.pdf>

⁶ [Communications Consumer Panel and ACOD response to the Commission's evaluation and review of the regulatory framework for electronic communications networks and services](#)

⁷ [Communications Consumer Panel and ACOD response to the DCMS' EU Electronic Communications Regulatory Framework: Post Implementation and Forward Looking Review](#)

Infrastructure

As we highlighted in a number of responses, including to DCLG and DCMS' Review of How the Planning System in England Can Support the Delivery of Mobile Connectivity⁸, in order to achieve the ambition for a connected future where seamless coverage is available for all, the Panel believes that failures on infrastructure must be addressed.

In many of our responses we referred to Ofcom's *Connected Nations Report*⁹, which demonstrates that there is more work to be done on mobile coverage and quality of service. While 99% of premises can receive a 2G signal, the proportion of the entire UK landmass able to receive a signal from all four operators has remained at 55%.

Although this is expected to increase following the agreement between the Government and all major operators for them to achieve 90% geographic coverage of voice services by 2017, not-spots and partial not-spots continue to have a negative impact across UK premises, roads, rail and landmass. They have a disproportionately high impact in rural areas and may give rise to serious safety issues. Not-spots are a particular concern in relation to business owners with a disability and for companies working in many rural areas and outside major conurbations.

Not-spots continue to have a negative impact across UK premises, roads, rail and landmass. They have a disproportionately high impact in rural areas and may give rise to serious safety concerns.

However, partial not-spots exist across the whole UK, including London and other major cities, particularly in-building. Whilst we understand that 4G rollout is important, we argued that it is far more democratic and equitable for all parts of the UK to have access to at least some acceptable form of mobile voice and data provision via 2G and 3G than for only some areas to have access to 4G, and others to be left with a vastly inferior service.

Highlighting that there is often a lack of effective competition in rural areas, we warned that unless the fundamental economics of rural coverage provision change, the commercial market alone will never achieve universality; it is imperative that public policy continues to address gaps in the market, is alert to where these are likely to occur in future provision, and takes steps to address them.

At Ofcom's Consumer Experience event, Panel Chair Jo Connell noted that there are still too many people that are unable to participate fully in the market or reap benefits from its development, especially in rural areas. She again emphasised that rural areas experience disproportionate problems with mobile coverage. Coverage inside buildings tends to be worse than outside and indoor coverage in rural areas is particularly poor. So

⁸ <http://www.communicationsconsumerpanel.org.uk/downloads/dclg-dcms-how-the-planning-system-in-england-can-support-mobile-connecti...pdf>

⁹ <http://stakeholders.ofcom.org.uk/market-data-research/market-data/infrastructure/connected-nations-2015/>

while 72% of rural premises in the UK have voice call coverage from all networks outdoors, only 31% of rural premises have the same level of coverage indoors. And 13% of rural premises have no coverage at all indoors.

We have continued to highlight that there is currently no agreed definition of what constitutes an acceptable threshold level to determine 2G voice call coverage. Based on its drive testing research conducted for last year's Infrastructure Report, Ofcom identified that a signal level of at least -86dBm was needed to provide good 2G voice call coverage. This level was used to report on 2G mobile coverage levels in the report. Mobile operators use a lower (-93dBm) signal threshold to determine 2G voice call coverage. While it is possible to make calls at these lower signal levels, it is more likely, from the drive test results, to lead to consumers experiencing interrupted and/or dropped calls. While Ofcom's most recent research supports the historic use of -86dBm for traditional phones, a more realistic threshold for modern smartphones is -81dBm. We therefore called for work to be carried out to establish an agreed and commonly used definition of what constitutes an acceptable threshold level.

Mobile coverage on the rail network is non-existent in many areas, sporadic and unreliable at best. According to the Office of Road and Rail, UK citizens are increasingly choosing to travel by rail. In 2014/15, over 1.6 billion passenger journeys were made by train, across the UK, and since 2008, the number of passenger journeys on the UK rail network has increased by 23%.¹⁰ In our response to the Department for Transport/DCMS consultation *Improving coverage for rail passengers*¹¹, we highlighted that evidence suggests that there is a strong need for access to mobile communications across the breadth of the UK rail networks; this need is particularly evident for business users.

There are relatively few technical solutions, but of those that are available, some have been tried and tested. We feel the evidence points towards a combination of specialised, trackside installations and on-board repeaters or boosters.

We were therefore encouraged by the Department of Transport announcement earlier this year that train operators are being asked to set out how they will meet the commitment to provide free Wi-Fi on trains for passengers. We urged progress on as many lines as possible in the very near future.

Broadband and the Universal Service Obligation (USO)

We were pleased to note that Ed Vaizey, the former Minister for Culture, Communications and Creative Industries, recognised consumers and citizens should have "*access to the internet whenever and wherever they need it*"¹².

Our responses to both DCMS's and the EC's consultations on the Electronic

¹⁰ http://orr.gov.uk/_data/assets/pdf_file/0005/18095/passenger-rail-usage-2014-15-q4.pdf

¹¹ <https://www.gov.uk/government/consultations/mobile-communications-for-uk-rail-passengers>

¹² <https://www.gov.uk/government/news/uk-digital-strategy-the-next-frontier-in-our-digital-revolution>

Communications Regulatory Framework¹³¹⁴ and Ofcom's Strategic Review of Digital Communications¹⁵ emphasised that the Panel considers that 10Mbit/s is the absolute minimum for an acceptable broadband user experience. But according to Ofcom's Connected Nations Report 2015, 8% of UK premises are unable to obtain speeds of 10Mbit/s; and 2% are unable to achieve 2Mbit/s - and as we have highlighted above, the problem is much worse in rural areas, where the figures are 48% - or 1.5 million households - and 9% respectively.

The Panel welcomed DCMS' subsequent announcement last year regarding a USO of 10Mbit/s. We are engaged with Ofcom as its thinking develops and we look forward to seeing the implementation plan for an affordable USO as soon as possible.

Although we have been encouraged by the greater availability of free public Wi-Fi, availability is currently patchy. Moreover, there is inadequate supervision of the security of such networks and poor information available to the public in terms of the security measures that are available. We stated that we believed that communications providers, including mobile network operators (MNOs), have a key role to play in raising people's awareness. The Panel had the opportunity to reiterate these points as part of its response to DCMS' call for inputs into a new digital strategy for the UK¹⁶.

We have previously welcomed the Government scheme launched with local bodies across the UK in 2015 to subsidise the costs of installing superfast capable satellite services. We are now encouraging exploration of technology neutral solutions to enable delivery of accessibility to these remaining areas as soon as possible. We are also urging close co-operation between Government agencies at all levels to ensure that the experiences and strategies of bodies working in one part of the UK (e.g. Community Broadband Scotland) are shared across the whole of the UK. We would support a requirement for all new housing developments and business parks/premises to include the provision of fibre broadband.

Nuisance calls, scams and ease of reporting

Nuisance calls, including live marketing calls, silent calls, abandoned calls, and recorded marketing message calls - and texts from businesses - can cause consumers irritation, anxiety, distress and potential financial loss. There is also a risk that they adversely affect people's likelihood of engaging with services by phone in general: a reduction in people's trust in their communications service is bad both for consumers and businesses.

We have seen some tangible progress in this area, e.g: the DCMS Nuisance Calls Action Plan; the Which? Taskforce's report; the budget announcement of a £3.5 million package to explore ways of protecting vulnerable people from nuisance calls; the lowering of the

¹³ <http://www.communicationsconsumerpanel.org.uk/downloads/dcms20pir20081015.pdf>

¹⁴ <http://www.communicationsconsumerpanel.org.uk/downloads/ec-telecoms-framework-review-response.pdf>

¹⁵ <http://www.communicationsconsumerpanel.org.uk/downloads/dcr-response-final.pdf>

¹⁶ <http://www.communicationsconsumerpanel.org.uk/downloads/digital-strategy-190116.pdf>

Information Commissioner's Office's (ICO) threshold for enforcing the regulations; and the amendment of the legislation to make it easier to exchange information between Ofcom and the ICO and some CPs' moves to block nuisance calls at a network level. However, the calls persist.

This year, the Panel has raised the continuing issue of nuisance calls in response to consultations by both DCMS¹⁷ and Ofcom¹⁸, and highlighted the scale of the problem. Ofcom has estimated that the overall number of nuisance calls made to UK consumers is around 5 billion per year: silent calls comprise about 1.5 billion calls, abandoned calls around 200 million, live sales 1.7 billion calls and recorded sales messages 940 million.

Ofcom also estimated the financial harm caused by all nuisance calls to landlines at a figure of £406m per year. It estimates £139-169m of this is caused by silent calls and £12-17m by abandoned calls.

For the past three years Ofcom has commissioned diary research, which involves around 1,000 consumer participants making a record of all the nuisance calls they receive during a four-week period in each study year. The research for 2015 showed that:

- 86% of participants received a nuisance call of some kind on their landline phone;
- 70% received a live marketing or sales call to their landline;
- 60% received a silent call to their landline;
- 52% received a recorded sales call to their landline;
- and 17% received an abandoned call to their landline.¹⁹

Older people are much more likely to be affected by the incidence of such calls. In the research, overall experience of nuisance calls increased with age, and those 65 years and over reported a significantly higher incidence of nuisance calls compared with those aged 16-34. For live marketing/sales calls, silent calls, recorded sales calls and 'other' nuisance calls, incidence was also higher amongst those aged 65+ compared to those under 55 years old.

In our previous response to the inquiry into the unsolicited marketing industry by the All Party Parliamentary Group (APPG) on Nuisance Calls²⁰, we welcomed the Government's expressed intention to legislate to enable Ofcom more easily to share information with the ICO and the Insolvency Service about companies undertaking such activities, and to

¹⁷ <http://www.communicationsconsumerpanel.org.uk/downloads/ccp-acod-dcms-cli-feb-2016-final.pdf>

¹⁸ <http://www.communicationsconsumerpanel.org.uk/downloads/ccp-acod-ofcom-persistent-misuse-23-feb-2016-final.pdf>

¹⁹ http://stakeholders.ofcom.org.uk/binaries/telecoms/nuisance-calls-2015/Nuisance_calls_W3_report.pdf

²⁰ <http://www.communicationsconsumerpanel.org.uk/downloads/appg-nuisance-calls---130913.pdf>

explore other options with regulators to remove barriers to enforcement, such as the ability of nuisance callers to conceal the telephone number which they are calling from, and the scope to lower the legal threshold that needs to be met before ICO can take action.

Following our support for the proposal to remove the current legal threshold to prove that a contravention was likely to cause ‘substantial damage’ or ‘substantial distress’,²¹ we were extremely pleased that the Government announced that there would be a change in the legislation to make it easier for the ICO to impose fines of up to £500,000 on the companies behind cold calls and nuisance texts. This new legislation came into effect from 6 April 2015.

As we had additionally called for greater co-ordination between agencies, we were also pleased that our calls for amendments to legislation, to make it easier for the ICO and Ofcom to exchange information, were accepted.

We wrote to communications providers to emphasise our belief that Caller Line Identification (CLI) should be offered free of charge by default, which is currently not the case among all providers. There are few tools available to consumers to combat nuisance calls, but CLI generally allows people to make an informed decision about whether to answer a call. As it is the service provided by telephone companies, and paid for by consumers, that is being abused it seems logical for CLI - one of the main available defence mechanisms against nuisance calls - to be freely available for all consumers. In light of the Government’s drive to ensure the provision of CLI, we cannot see how some communications providers can continue to justify charging for CLI, especially when other providers provide CLI to all their customers free of charge.

As part of our work in this area, we raised concerns with BT about their policy on Caller Display charging and were pleased that they agreed to change their renewal process so that customers who currently have Caller Display will continue to receive the service on renewal without having to opt-in again.

The CLI service can be used to report nuisance calls to regulators, as well as being critical for the effective use of handsets and services that rely on caller display to block and filter certain calls. We have argued for a requirement for all business calls to carry an authentic and returnable CLI - with an exemption process for those that may have a legitimate reason for withholding e.g. abuse shelters.

Our response to DCMS’ consultation on ‘Requiring direct marketing callers to provide Calling Line Identification (CLI)’²² referred to the fact that in the area for which Ofcom has direct responsibility, i.e. abandoned and silent calls, the Guidelines set out that business callers should help consumers identify them by ensuring a valid and accurate CLI is available. However, this is not currently the case for all marketing calls as the Privacy and

²¹ <http://www.communicationsconsumerpanel.org.uk/downloads/ico-threshold-final.pdf>

²² <http://www.communicationsconsumerpanel.org.uk/downloads/ccp-acod-dcms-cli-feb-2016-final.pdf>

Electronic Communications Regulations (PECR) and the Privacy and Electronic Communications Directive contain provisions enabling a calling party to withhold their CLI.

We therefore agreed with the proposal that the Government should amend PECR to make it a requirement for direct marketing callers to provide CLI. Mandatory CLI from direct marketing companies, requiring a genuine telephone number that can be called back, will be a vital tool in protecting and helping consumers.

In response to Ofcom's review of its statutory policy statement²³ on the exercise of its powers relating to the persistent misuse of electronic communications networks and services, we agreed that no-one should make nuisance or silent calls or send nuisance messages. We welcomed the clarification of the guidance in relation to the levels of abandoned calls, although we urged Ofcom to go further and enhance its enforcement process so that it can take greater, and more effective, enforcement action more quickly.

We emphasised that Persistent Misuse Powers are a very important element of the protection framework for consumers. We therefore proposed their revision so that they better meet the needs of consumers in the context of high volumes of nuisance calls; and so that businesses can be very clear about expectations and consequences in respect of misuse.

Whilst we support Ofcom in encouraging industry to aim higher to ensure that consumers are safeguarded from annoyance, inconvenience and anxiety, we suggested reducing the abandoned call rate threshold, ideally to 0% - but to a maximum of 1% - to work towards eliminating one potential source of nuisance calls.

We strongly endorsed Ofcom's intention to publish details of enforcement action, which we believe will act as a powerful deterrent to persistent misuse. As a principle it also demonstrates transparency on Ofcom's behalf, which we encourage, and will give consumers greater confidence in Ofcom; as a consequence encouraging them to report misuse. Publicising the names of companies helps to redress the power imbalance in this area: whereby some companies abuse the personal information they hold about consumers (for the purpose of making unwanted calls) through the channel of communications services that people have paid for.

Nuisance calls remain a significant concern for the Panel and continue to be a priority area.

Treating consumers fairly and customer service

A key area of work for the Panel over the past year has been to encourage greater

²³ <http://www.communicationsconsumerpanel.org.uk/downloads/ccp-acod-ofcom-persistent-misuse-23-feb-2016-final.pdf>

consumer protection from high bills run up on lost and stolen mobile phones, urging action to limit the consumer's exposure to such charges.

Last year the Panel wrote to Ed Vaizey, to highlight that little progress had been made on implementing the agreement for caps on bills for lost or stolen mobiles that had been announced by his predecessor in 2013. The Panel also held a series of face-to-face meetings with the mobile network operators to highlight the issues directly. We were therefore pleased to note that EE, O2, Three, Virgin and Vodafone have implemented a £100 cap when a phone is reported lost or stolen within 24 hours.

We have identified that there is no such consensus among mobile virtual network operators (MVNOs) and have been liaising with communications providers to encourage work to progress this. We have also written to DCMS to highlight the problem.

At Ofcom's Consumer Experience event, Jo Connell highlighted the Panel's concerns about disproportionate increases in fixed line rental, especially for the 10% of UK households who do not take broadband. These consumers are more likely to be older or on a low income. Jo also highlighted that increasingly complex pricing and promotional offers made it hard for people to compare prices and identify the best deals.

Customer Service and ADR

In our response to Ofcom's DCR, and the EU and DCMS reviews of the Telecoms Framework, we referred to our research *Going Round in Circles?*²⁴; commissioned to understand the experiences of people who had contacted their provider to try and resolve an issue. The research highlighted themes that remain current:

- For a variety of reasons, some people who don't contact their provider are suffering in silence and 'getting by' on a substandard service;
- For some who did contact their provider, their initial frustration was exacerbated by a negative contact experience;
- 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;
- Some older consumers and some consumers with a disability seemed to be at particular disadvantage in their dealings with providers;
- Escalation of problems frequently appears to be ineffective and communications providers seem to be poor at telling customers about ADR.

Following the issues highlighted by the research, and our own subsequent exploration of the topic, the Panel made a series of customer service related recommendations in five key areas:

²⁴ <http://www.communicationsconsumerpanel.org.uk/downloads/going-round-in-circles.pdf>

- The quality of information provided to customers must be improved;
- Contact centre staff training should be reviewed and strengthened;
- The consumer contact experience should be improved;
- Greater support should be provided for older and disabled consumers;
- Escalation and ADR referral process should be reviewed and strengthened.

This year we published new qualitative research

We're Not All The Same! Inclusive

Communications, to explore in detail how accessible communications providers are to customers who have additional communication support needs, such as people with disabilities, and older consumers (aged 75+).

We discuss the findings in detail later in this document.

However, our research found that communications services can have even greater significance for older and disabled people by helping to mitigate some of the potentially disempowering effects of age or disability. They can help to reduce vulnerability by giving people access to information and services they cannot easily obtain through other channels, and by facilitating participation and inclusion.

We held a series of events around the UK to discuss both pieces of research, their findings and recommendations, with a range of stakeholders including communications providers and Ofcom, highlighting in particular the needs of disabled people. We will continue to urge the communications industry to raise the level of customer service it offers so that consumers enjoy better holistic standards.

Our research found that communications services can have an even greater significance for older and disabled people by helping to mitigate some of the potentially disempowering effects of age or disability

In order to hold CPs to account we requested regular updates in relation to our recommendations in five key areas: quality of information; contact staff training; consumer contact experience; support for older and disabled consumers; and ADR referral processes. We made clear that we remain particularly concerned about consumers' ability to access ADR schemes.

A crucial step in the complaints handling process is for providers to inform consumers, in a clear and timely fashion, of their right to take a complaint to the relevant ADR service. When ADR was introduced in 2003, the intention was for a free, simple, low risk and easily accessible independent resolution service. We note that thirteen years on, the weak link in the chain remains those providers who have failed in respect of making ADR accessible because they do not inform complainants of their rights and options. This must change, and the Panel continues to call on all stakeholders to work together to provide consumers

with the comprehensive complaints resolution process that they have every right to expect.

Over the past year, we have been raising these issues with Ofcom, the communications providers and ADR Services.

Referring to the findings of the Mott McDonald independent study²⁵ into ADR referral, released by Ofcom, the Panel has serious concerns:

- There is a lack of communication about ADR, with the first mention almost always coming from customers;
- Only one-fifth of complaints were logged with a correct start date;
- In over 60% of the cases where consumers had requested a deadlock letter, they did not receive one;
- Only approximately 5% of the complainants that should have received an eight-week letter from their CP (which informs consumers of their statutory right to ADR) had done so.

The Panel is calling for a four-week complaint duration time before consumers can approach the ADR schemes. We have also recommended the open publication of data on how providers perform in respect of complaints to the ADR schemes.

The Panel is calling for a four-week complaint duration time (a reduction from eight weeks) before consumers can approach the ADR schemes. We have also recommended the open publication of data on how providers perform in respect of complaints to the ADR schemes. We note that this has recently been launched, successfully, by the energy ombudsman.

We will continue to work with ADR schemes, CPs and Ofcom, to encourage improvements in complaint handling systems along with greater promotion of the ADR schemes.

Privacy and security of personal data

The range of opportunities offered by the internet, mobile apps and micropayments provide consumers and citizens with a host of potential benefits. However, with machine-to-machine data exchange on the horizon, and as the market for personal data becomes ever more complex and monetised, it is increasingly important that people understand the implications of the consent they are giving organisations for the use of their data and, with regard to security, the precautions they can take. This becomes more important with

²⁵ <http://stakeholders.ofcom.org.uk/market-data-research/other/telecoms-research/adr-access/>

the potential of the Internet of Things to collect and use increasing amounts and types of consumer information.

In our response to the Electronic Communications Regulatory Framework review we raised our concerns about online privacy and security of data. We highlighted that consumers need to be given the tools to: control their data; understand how data has evolved and how it might in future; the value of their data; and especially the implications of their consent to its re-release and use. We are calling for consumer-centric policies; clear and layered privacy notices and regulations that allow innovation but hold companies responsible if they misuse data.

We are calling for customer-centric policies - clear and layered privacy notices and regulations that allow innovation but hold companies responsible if they misuse data.

Ofcom's Strategic Review of Communications, offered the Panel²⁶ an opportunity to highlight that, with the advancement of the Internet of Things, it was more important than ever for consumers to have the tools to control their data and that companies should have a compliance culture (which could involve a Code of Conduct for example) - to supplement any existing regulatory framework - and adhere to it. The Panel therefore emphasised that it would like to see Ofcom take a proactive role when it comes to assessing consumer impacts, protection and awareness.

This year, the Panel has built on its previous research, *Online Personal Data - the Consumer Perspective*²⁷ to identify and highlight the issues, draw attention to the need for further work, and encourage regulators - including Ofcom, Governments and the EU - to ensure that consumer and citizen views and experiences are at the heart of policy making and regulation in this area. Further details can be found under *Digital Footprints* in the Research section below.

Digital Engagement/Detriment:

It is the Panel and ACOD's belief that all consumers should be able to benefit from the opportunities and enjoyment that communications services can bring.

Fundamental action needs to be taken to mitigate the increasing risk of the digital divide becoming an ever greater digital gulf. We live in an era in which we are seeing many Government services become "digital by

Fundamental action needs to be taken to mitigate the increasing risk of the digital divide becoming an ever greater digital gulf.

²⁶ <http://www.communicationsconsumerpanel.org.uk/downloads/dcr-response-final.pdf>

²⁷ <http://www.communicationsconsumerpanel.org.uk/online-personal-data/online-personal-data-1>

default” and when being online is becoming a *necessity of life* rather than an optional extra.

While the advantages of online connectivity apply to all groups in the community, they are especially relevant to disabled people, those on a low income and older people, many of whom may be less mobile than younger people. However, according to Ofcom’s 2015 Adult Media Use and Attitudes Report²⁸, 14% of UK adults remain offline and are more likely to be aged over 65, and in households within the DE socio-economic group. Two in three people aged 75+ are non-users of the internet. Internet access is also significantly lower for those consumers with a disability (65%) than for non-disabled consumers (88%)²⁹. Ofcom’s most recently published research on disabled consumers’ access to, and use of, communication devices and services also found that not all disabled consumers with access to communication devices and services were making personal use of them. A fifth of disabled consumers said their disability prevented their use of at least some communication devices and services, with differences seen among consumers with different disability types.

The Panel has long highlighted that digital engagement is a key component of modern society. The lack of engagement amongst some groups - because of poor access, affordability, a lack of skills, confidence or motivation, impacts not only on them directly, but also on the overall strength of the economy, impacting the broader population. The Tinder Foundation, alongside Go ON UK (now doteveryone), last year published a report, ‘*The economic impact of Basic Digital Skills and inclusion in the UK*’³⁰ which set out the huge financial and social benefits of everyone in the UK having the skills they need to survive in our digital world. The report estimated that over the 10 year period between 2016 and 2025, 4.9 million of those who do not possess Basic Digital Skills will get online without additional help, but the remaining 7.9 million (15% of the adult population) will need support to gain Basic Digital Skills at an estimated cost of between £45 and £334 per person. The report sets out the six main benefits to individuals and to the Government of equipping 100% of the population with Basic Digital Skills.

A fifth of disabled consumers said their disability prevented their use of at least some communication devices and services, with differences seen among consumers with different disability types.

²⁸ <http://stakeholders.ofcom.org.uk/market-data-research/other/research-publications/adults/media-lit-10years/>

²⁹ http://stakeholders.ofcom.org.uk/market-data-research/other/cross-media/disabled-consumers-ownership-comms-services/Disabled-consumers-use-of-communications-services/?utm_source=updates&utm_medium=email&utm_campaign=Disabled-consumers-use-of-communications-services&utm_term=disability%20disabled%20communications%20services%20mobile%20phone%20tv%20landline%20research

³⁰ <http://www.tinderfoundation.org/our-thinking/research-publications/economic-impact-basic-digital-skillsand-inclusion-uk>

Whilst solutions may be complex, the issue itself is straightforward: 23% of UK adults still don't possess the basic digital skills necessary to take advantage of technology, according to a recent report³¹ by Go ON UK. Research by Lloyds Bank³² reveals that it is not just individuals that are missing out on the benefits of being online. 23% of small businesses don't have basic digital skills. Without these, these SMEs are missing out on their share of the UK's annual website sales of £193 billion. Not only that, they also risk losing potential business because they can't be found online, may be missing an opportunity to deliver a better, more efficient service to their customers, and may not be maximising their competitiveness. In the charity sector the challenge is even greater - over half of all UK charities are lacking basic digital skills.

In our responses to the House of Commons Science and Technology Committee call for evidence in relation to Digital Skills³³ and DCMS' call for inputs into a new digital strategy for the UK³⁴ we highlighted that we believe that infrastructure cannot stand alone and must be linked to digital participation initiatives. The best connectivity in the world is fundamentally undermined if significant numbers of the relevant population are not able to use it to best effect. In our view, social inequalities will be heavily influenced one way or the other by communications availability and effective digital participation (or lack of these things).

We referred in our responses to our previous work in supporting government and others increase the number of people using the internet, including the development of the *Consumer Framework for Digital Participation*³⁵ and our 'Bridging the Gap: Sustaining Online Engagement' research, where we identified a number of areas for strategic focus and made recommendations for Government, policy makers and those delivering on the ground. Our responses also emphasised that, in the Panel's view:

- the challenge to increase participation is underestimated;
- meeting the challenge is underfunded; and
- people who remain unable to access online services will suffer increasing detriment if the challenge isn't met.

We therefore supported:

- the establishment and/or consolidation of comprehensive digital help;
- free access at locations people might regularly use, e.g. schools and colleges open to local citizens after school hours;

³¹ https://doteveryone-prod.s3-eu-west-1.amazonaws.com/uploads/Basic%20Digital%20Skills_UK%20Report%202015_131015_FINAL.pdf?utm_source=insights%20page&utm_medium=bdsresearch&utm_campaign=insights%22%20target=%22_blank

³² <http://resources.lloydsbank.com/insight/uk-business-digital-index/>

³³ <http://www.communicationsconsumerpanel.org.uk/downloads/hoc20digital20skills20jan202016.pdf>

³⁴ <http://www.communicationsconsumerpanel.org.uk/downloads/digital-strategy-190116.pdf>

³⁵ <http://www.communicationsconsumerpanel.org.uk/downloads/what-we-do/previous-projects/access-and-inclusion/FINAL%20DP%20SUMMARY.pdf>

- a free helpline for users of government digital services to provide technical as well as specific service support.

The Panel also expressed its belief that libraries have a vital role to play, in conjunction with other locally based agencies, in supporting and encouraging people who are not fully digitally engaged. They have the potential to deliver a well-supported, safe and sustained learning environment that excludes no-one. Commercial organisations, including banks and communications providers, also have a role to play - as in the Go ON UK model. As society changes, this is more important than ever before, so that we ensure that more vulnerable consumers and citizens are empowered and are not left behind.

Microbusinesses' experience of communications

There are an estimated 5.2 million private sector businesses in the UK and 95% of them can be classified as a micro business. They account for 33% of UK private sector employment and over 18% of turnover. As part of its 2014 report, *'Realising the potential: micro businesses' experiences of communications services'*, the Panel commissioned Jigsaw to carry out independent, qualitative research with a wide range of 115 micro businesses from across the UK.

The research highlighted that communications services play a critical role in the success of micro businesses. However, they face a wide range of challenges in using and fully exploiting the opportunities offered by these services and technologies for the benefit of the business; and, for the people running these enterprises, time is often at a premium.

Following the research, we highlighted that for micro businesses to gain greater benefit from their communications services, action needs to be taken in three key areas:

- Governments, in association with Ofcom, industry and communications providers, should focus on supplying improved speeds and coverage for both fast broadband and mobile voice and data;
- Communications providers should consider offering tailored communications service packages for micro businesses, facilitating access to robust services and business grade support levels;
- Governments, Ofcom, local authorities, local enterprise partnerships, chambers of commerce, trade associations and communications providers should review the information and advice they offer about the benefits of investing in communications, tailored to the needs and time restraints of micro businesses.

As a follow-up to the publication of our research, the Panel convened roundtable events in Belfast, Cardiff and Glasgow during April 2015. The roundtables offered an opportunity to discuss both our own research and policy recommendations in addition to Ofcom's quantitative research on SMEs' communications needs with a range of stakeholders. These included communications providers, and consumer, government and trade representatives.

The events highlighted a consensus around micro businesses' difficulty in identifying their communications needs and therefore the appropriate packages for their business. More could be done by both communications providers and business support groups to co-ordinate and provide information.

The discussions also revealed that there was a lack of clarity around termination costs, which was an issue for micro businesses, and it was agreed that the situation would benefit from the provision of comparison websites for micro businesses.

We re-emphasised these points in our response³⁶ to BIS's Call for Evidence on the protection of micro and small businesses in purchasing products and services. We have also advised Ofcom in relation to improvements of its small business portal, particularly in relation to sign-posting business to the information.

Research

Inclusive Communications

The Panel commissioned qualitative research to explore in detail how accessible communications providers are to customers with additional communication support needs, such as people with disabilities, and older consumers (aged 75+).

The research, *Inclusive Communications*, found that communications services can have a greater significance for older and disabled people by helping to mitigate some of the potentially disempowering effects of age or disability. They can help to reduce vulnerability by giving people access to information and services they cannot easily obtain through other channels, and by facilitating participation and inclusion.

However, the report highlighted that:

- Customer service issues, such as inflexible customer service responses and poorly trained customer service agents, can cause problems and frustrations;
- Systems-related issues such as passwords and call routing systems can act as barriers to inclusion;
- There is a lack of awareness – among service users and some communications providers' staff – of specific rights for disabled people relating to equivalent access;
- People use a variety of strategies to help overcome barriers to inclusion;
- Some (but certainly not all) think that disclosing their impairment is a useful strategy to get a better experience;

As a follow-up to the publication of our research, the Panel convened roundtable events in Belfast, Cardiff and Glasgow during April 2015.

³⁶ <http://www.communicationsconsumerpanel.org.uk/downloads/communications-consumer-panel-and-acod-response---bis-protection-of-msbs...pdf>

- Being assertive and making complaints are other ways of combating poor treatment, but many were reluctant to switch.

At the time of publication, Panel Chair Jo Connell said; “To enable consumers and citizens to benefit from the opportunities offered by modern communications services, it is vital that they are appropriately supported to do so. This research strongly suggests that some older and disabled consumers encounter a further barrier to effective use of their communications services. They are not receiving the quality of customer service to which they are entitled from their communications providers. This is unacceptable. Communications providers need to operate in a flexible way that is sensitive to the needs of the customer. Where additional adapted services are offered, they must suit the needs of the individual and be consistent and well signposted.”

The consumer experiences outlined in the Panel’s research highlighted a number of systemic issues, along with opportunities for improvements. We made a series of associated recommendations in our covering report; *We’re Not All the Same!*³⁷

The recommendations address the issues highlighted by the research, providing tangible actions for providers to not only improve the experience of older and disabled consumers, but to also increase the attractiveness of their businesses to those people. Panel Chair Jo Connell, and members of the Communications Consumer Panel, met with stakeholders in a series of roundtable events to discuss our recommendations. We held events in Belfast, Cardiff and Glasgow with a range of colleagues from private, public and third sectors in attendance. Discussions were based on our recommendations and the issues highlighted by the research.

Remarking on the events, Rick Hill, the Communications Consumer Panel member for Northern Ireland, said; “The event in Belfast involved useful discussion on the report and commitment from stakeholders to work with Ofcom to provide and circulate Northern Ireland specific advice on regulation.”

Mairi Macleod, Communications Consumer Panel member for Scotland, commented; “The round table in Glasgow provided an opportunity for the Panel and communications providers to hear from a range of organisations who support the most vulnerable in Scotland, providing some really useful insights.”

Rhys Evans, the Communications Consumer Panel for Wales said; “The discussion in Cardiff following the presentations was wide ranging and included topics such as the nature of regulation and whether it was more effective to issue process-

This research strongly suggests that some older and disabled consumers encounter a further barrier to effective use of their communications services. They are not receiving the quality of customer service to which they are entitled.

³⁷ <http://www.communicationsconsumerpanel.org.uk/downloads/were-not-all-the-same---final-report-171215.pdf>

focused or outcome focused regulations; and how to make customer service future-proof for an ageing population who may move in and out of vulnerability.”

Digital Footprints

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

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

Although the range of opportunities offered by the internet, mobile apps and micropayments provides consumers and citizens with a host of potential benefits, it is increasingly important that people understand the implications of the consent they are giving organisations for the use of their data, and the precautions they can take to safeguard their personal information.

This year, the Panel has commissioned new research that re-visits and builds on our 2011 research, *Online Personal Data - the Consumer Perspective*³⁸, to provide a comprehensive 5-year update.

The research combines a mix of desk research, a 1,000 face-to-face quantitative survey and in-depth interviews.

The objectives of this new research are to explore:

- The extent to which people are aware of the various methods of collecting data in the online environment;
- The extent to which people are prepared to share their own data and what benefits they expect in return;
- Consumer awareness of ways in which they can protect their online data, and their use of such methods;
- People’s understanding of online terms and conditions and the nature of consent they are giving online e.g. the use of their data by third parties;
- Expectations of how companies hold and treat their data;
- Attitudes towards what is currently being done to protect personal online data;

³⁸ <http://www.communicationsconsumerpanel.org.uk/online-personal-data/online-personal-data-1>

- Are adults aware of the way their children's data is being used and are they able to control consent on the use of it?
- The extent to which consumers are aware of, understand and use 'smart' products and 'the internet of things' e.g. smart meters, home automation apps, health and fitness apps with particular focus on the implications for their personal data.

The Panel will publish this new research in 2016.

Review

Affordability and debt

The Panel recognises that alongside the many benefits that the digital content market offers consumers come attendant risks; particularly as people who are in more vulnerable positions are more likely to use premium rate services (PRS) and can unknowingly and rapidly incur high bills.

PhonepayPlus's 2014-17 Strategic Plan emphasised protecting vulnerable consumers as central to their regulatory mission. The Panel has contributed to their discussion document on vulnerability³⁹ and has been part of the vulnerability working group to develop proposed vulnerability guidance.

The purpose of the guidance is to:

- Assist providers to interpret the Code and remain compliant with it;
- Assist providers to proactively ensure they mitigate any risks of taking unfair advantage of vulnerable consumers;
- Contribute to building trust in the market;
- Define who is likely to be considered as vulnerable consumers by detailing some of the characteristics and circumstances that may lead to a situation of vulnerability.

The Panel welcomes the proposals and supports their implementation.

Consumer Information

The proliferation of communications services, options and tariffs has brought an increasing level of choice for the consumer. But comparing the different options available in this complex market is not straightforward.

³⁹ <http://www.communicationsconsumerpanel.org.uk/downloads/ppp---vulnerability-300915.pdf>

A theme that recurs across our work is the vital need to increase the transparency and clarity of information about communications service provision. The Panel's work on behavioural economics⁴⁰ highlighted that, in contrast to traditional economic models, consumers do not act in a perfectly rational manner and are not constantly assessing the market for better deals.

We have encouraged businesses to continue to improve the information available online and by other means. We consider that prominent "plain English" information about contract length and early termination charges (ETCs) should be available to all customers, on bills, by phone and online, and it should be communicated specifically when enquiring about switching. We believe that clear information about service level expectations, pricing and customer service standards should be readily available to consumers without the need for undue searching.

At Ofcom's Consumer Experience event, Jo Connell welcomed the publication of information on broadband and mobile coverage but noted that the report revealed a significant percentage of people still have difficulty in comparing communications services prices, mobile coverage and broadband speeds, encouraging more work to be done in this area. Ofcom's Consumer Experience research has highlighted that the proportion of consumers aged 65+ who are unaware of any trusted sources of information is about double the average in each market - ranging from 5% in the bundled services market to 26% in the fixed line market. The research also highlights that amongst the general population, around a quarter of respondents consider it difficult to compare the costs of bundles of communications services: 20% of respondents stated that it is, or would be, "difficult" to compare the costs of stand-alone fixed-line services, and 24% said this about bundled services.

Jo also acknowledged that the publication of quarterly complaint statistics had a tangible effect on providers, and stated that the Panel would like to see this go further, with the publication of ADR referrals and outcomes.

Consumers need accurate, accessible and easily comparable information that does not overwhelm them with detail and Ofcom has a key role in making sure consumers are informed and making good buying decisions.

We place one caveat on informed choice - it is that information overload is a real risk, and can have the opposite effect. So information should help not hinder; and should inform, not confuse. Markets are complex and consumers are largely time poor; too much information (for example, too many tariffs and confusing deals) is not the solution.

Our response to Ofcom's consultation on an Approval Logo for, and modifications to, the Metering and Billing Scheme⁴¹ (the Scheme) advocated the use of an Approval Logo, to

⁴⁰ <http://www.communicationsconsumerpanel.org.uk/downloads/what-we-do/previous-projects/access-and-inclusion/BE%20intro%20final%20with%20date.pdf>

support consumers' awareness of the Scheme. Although Ofcom decided not to proceed with the introduction of a logo on this occasion, we believe this is a prime example of a positive step that can be taken to inform and assist consumers and micro businesses, which can also benefit communications providers.

Non-geographic calls

The Panel has continued to discuss the new arrangements for non-geographic calls with the Ofcom team and awaits an overview of its effects this summer, a year on from implementation.

Post

In addition to discussion at the Scottish Parliament's Cross Party Group on postal issues, we responded to Ofcom's discussion document on its review of the regulation of Royal Mail⁴². We stressed that we believed review was necessary, recognising both changes in market conditions and in consumer behaviour (both residential and micro business customers) in order to maintain a universal service that meets the needs of all consumers, is financially sustainable, fit for purpose and, crucially, affordable.

We reiterated our view that there should be clarification of the term "regulated postal operator", and we were pleased to see that Ofcom intends to examine this as part of the wider review. We believe that clearer, more meaningful terminology will make it easier for consumers to understand their rights and how to assert them. The Panel also contributed to Ofcom's review of postal complaints and redress⁴³.

Switching

The Panel has previously highlighted its concerns about the barriers to switching which face all consumers, but particularly those who are older, disabled, or on lower incomes. The number of different switching processes operated, lack of clarity regarding timescales and charges and the fact that switching processes are currently in the hands of the provider which has most to lose from the switch all leave consumers open to harm and detriment.

We believe that a Gaining Provider Led (GPL) process should be the model for all switching processes.

We have called for the process of switching communications providers to become easier for consumers and micro businesses. In our view, low switching levels lead to reduced competition, the poten-

⁴¹ <http://www.communicationsconsumerpanel.org.uk/downloads/ofcom-approval-logo-aug-2015-final.pdf>

⁴² <http://www.communicationsconsumerpanel.org.uk/downloads/review-of-the-regulation-of-royal-mail-sept-2015.pdf>

⁴³ http://stakeholders.ofcom.org.uk/binaries/post/review-complaint-handling-redress/Communications_Consumer_Panel.pdf

tial for the engaged to be cross-subsidised by the unengaged and a worse deal for consumers across the board. However, switching between CPs is often complex, and involves steps that must be coordinated between different providers in ways that do not arise in other consumer markets. What should be an easy and seamless consumer journey as part of a vibrant market can be an obstacle-ridden process that, evidence suggests, discourages switching and thus deprives consumers of potential benefit. Additionally, consumers may suffer instances of poor service that are in themselves a cause of harm and detriment, as well as having a negative impact on the industry's reputation.

We believe that a Gaining Provider Led (GPL) process should be the model for all switching processes. The Panel has previously urged providers to work with Ofcom to design a unified switching system as soon as possible. The aim should, we believe, be harmonised switching processes for all communications services including mobile, pay TV and cable services. We are also concerned by providers using a variety of contract end dates within a bundle, which can add to complexity and deter consumers from switching.

This year, the Panel has spoken at a variety of events, including the Broadband Stakeholder Group's *Competition in a Converged World* and responded to a number of consultations which have looked at switching within the communications market. These included the Panel's responses to the DCMS⁴⁴ and the EU⁴⁵ in relation to the EU Electronic Communications Regulatory Framework along with Ofcom's DCR review and consultation on Consumer Switching⁴⁶.

We made reference to the evidence provided by Ofcom that switching rates are low - which does not suggest a healthy and vibrant market. Even though the reasons may be unclear, low switching rates suggest that the market may not be working as well as it could for consumers. We believe that easier switching would also help consumers and micro businesses to understand and engage in the communications market, and will certainly do no harm.

Our responses emphasised that 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. 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.

We advised that we would welcome a policy approach which acknowledges the sometimes diverse needs of all consumers in the market. Age and/or disability does not necessarily confer vulnerability but, as has been seen, older and disabled people are more likely to

⁴⁴ <http://www.communicationsconsumerpanel.org.uk/downloads/dcms20pir20081015.pdf>

⁴⁵ <http://www.communicationsconsumerpanel.org.uk/downloads/ec-telecoms-framework-review-response.pdf>

⁴⁶ <http://www.communicationsconsumerpanel.org.uk/downloads/ofcom20mobile20switching20final20oct202015.pdf>

rely on more traditional communications services and, given lower switching levels, may be more likely to experience detriment. This concern extends to harder-to-reach groups such as rural communities with limited access to broadband, where everyone is more likely to be disadvantaged in relation to communications, irrespective of age.

We noted that one of the key difficulties that consumers face in choosing a new provider can be how to evaluate the plethora of services on offer. We have also pointed out that currently, there is a low level of use of price comparison websites by consumers, despite extensive use of consumer review sites in other sectors.

We urged that accredited websites should be able to provide comparable data across all providers; and we advised that information should be in consumer-friendly formats and offer assistance to people in assessing and evaluating the information.

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.

Spectrum Strategy

Whilst the Panel recognises the increase in mobile device ownership, we remain unsure about the evidence base behind long term demand predictions - the reliability of which we do not believe can be certain. Although it is important that consumers and citizens can enjoy the mobile data services they want and need, there are also sections of society who will not benefit to such an extent from improvements to mobile services. It is important that a balance is struck between the potentially competing needs of these groups.

When responding to a number of consultations this year, including the CMS Committee inquiry into establishing world class connectivity in the UK⁴⁷ and both responses in relation to the regulatory framework for electronic communications and networks^{48 49}, we have highlighted our belief that it is vital that the digital terrestrial television platform can remain viable, innovative and competitive so that the interests of consumers and citizens who are not on a pay TV platform are protected.

We urge that careful consideration is given to the impact that any change in spectrum allocation could have on DTT consumers - especially more vulnerable people. We have strongly encouraged the regulator to work with operators to ensure that they are using their allocated spectrum to best and most efficient effect as part of any process to make further spectrum available.

Inclusion and Accessibility

Throughout the past year, we have met CPs and broadcasters, as well as writing to the BBC Governors and Executive, to raise our concerns about ensuring that content is availa-

⁴⁷ <http://www.communicationsconsumerpanel.org.uk/downloads/world-class-connectivity.pdf>

⁴⁸ <http://www.communicationsconsumerpanel.org.uk/downloads/dcms20pir20081015.pdf>

⁴⁹ <http://www.communicationsconsumerpanel.org.uk/downloads/ec-telecoms-framework-review-response.pdf>

ble, accessible and inclusive on both broadcast and video on demand content. We have also met subtitle providers to hear about the latest developments in subtitling. There have been important technical developments in the provision of live subtitling and we are extremely keen to see these promoted and used as soon as possible for the benefit of people who currently experience detriment from the provision of delayed text.

In our response to the BBC Charter Review Public Consultation⁵⁰ we emphasised that audience members, and particularly older and disabled people, should be able to have access to content by their preferred method; and they should have equal opportunity to consume and enjoy a range of high quality content.

We stressed that it is extremely important that the BBC continues to provide comprehensive levels of accessibility - in its broadest sense - to content to ensure that, as far as practicable, users can enjoy equivalent access. Not everyone has internet access nor does everyone go online, and this is more likely amongst older and disabled people. Ipsos MORI research⁵¹ has highlighted however that many older people continue to watch television exclusively on a TV set.

As not everyone has internet access, we continue to encourage the development of an open-standard catch-up/on- demand player which would avoid consumers having to learn a number of different interfaces, with varying degrees of accessibility, in accordance with Government Digital Service guidelines on building for inclusion⁵².

The Panel has continued to engage with Ofcom's range of work on the accessibility of content, and we met a range of broadcasters and ATVOD in relation to the provision of access services for video on demand (VOD) content. We have written to the BBC Trust and Executive urging the publication of statistics in relation to the BBC's provision of subtitles for VOD content and met with industry providers. We wish to see everything possible being done to improve the provision of subtitles on VOD content sooner rather than later.

In our response to Ofcom's consultation on proposed improvements to Electronic Programme Guide (EPG) accessibility for people with visual impairments⁵³, we strongly supported the view that the speaking EPGs should be introduced as a mainstream application.

We highlighted that we have long argued that provision for people with disabilities should be built into technology as standard, rather than as a separate piece of development or hardware and we see no reason why EPGs should fall into a different category - particularly given the importance of TV to people with partial sight or blindness. We therefore called for the initiative to be implemented as soon as possible. We reiterated our belief that, as far as practicable, all content users should have equivalent access. In

⁵⁰ <http://www.communicationsconsumerpanel.org.uk/downloads/ccp-acod20-20bbc20charter20review20draft20final20-20081015.pdf>

⁵¹ <http://stakeholders.ofcom.org.uk/binaries/broadcast/reviews-investigations/psb-review/psb3/psb-review-ipsos-mori.PDF>

⁵² <https://www.gov.uk/design-principles>

⁵³ <http://www.communicationsconsumerpanel.org.uk/downloads/epg-code-amendments-oct-2015-final.pdf>

particular, we agreed that the EPG Code should be amended to require EPG providers to use their best endeavours to ensure that:

- Speaking EPGs are incorporated in multi-functional TV receivers;
- EPGs in multi-functional TV receivers enable users to highlight or list separately programmes with audio description, and with signing;
- EPGs in multi-functional TV receivers enable users to adjust the display of EPG information so that it can be magnified or the text enlarged;
- EPGs in multi-functional TV receivers include the option of high contrast displays with a minimum contrast ratio of 7:1.

In our response to Ofcom's consultation on access services targets for non-domestic channels, the Panel and ACOD also indicated their support of Ofcom's proposal to bring arrangements for signing on qualifying non-domestic channels in line with those for qualifying domestic channels⁵⁴.

In the coming year we will continue to engage with Ofcom's range of work on the accessibility of content, including on the accuracy of live subtitling, and maintain our focus on the provision of access services for video on demand content, so that, as far as practicable, users have equivalent access.

We will look to engage with the work to inform potential users about Next Generation Text Relay (NGT), as well as its further development. Our responses have emphasised that text relay and NGT is a vital service as it enables people with hearing and/or speech impairments to communicate with others via the telephone. We aim to continue to work with Ofcom as it monitors NGT to ensure it meets the required standards and undertakes research to compare the current and new relay service, as well as monitoring developments in speech recognition technology which may support further improvements to these services in the future.

We have long argued that provision for people with disabilities should be built into technology as standard.

In our responses to both the EU⁵⁵ and DCMS⁵⁶ in relation to their consultations on the regulatory framework for electronic communications networks and services, we highlighted Ofcom's mystery shopping⁵⁷ which suggests that disabled consumers may not consistently be getting the information they need about the services that are available to them via in-store, online or telephone interactions. This

⁵⁴ <http://www.communicationsconsumerpanel.org.uk/downloads/ccp-acod-response-to-ofcom-non-doms-channels-dec-2015.pdf>

⁵⁵ <http://www.communicationsconsumerpanel.org.uk/downloads/ec-telecoms-framework-review-response.pdf>

⁵⁶ <http://www.communicationsconsumerpanel.org.uk/downloads/dcms20pir20081015.pdf>

⁵⁷ <http://stakeholders.ofcom.org.uk/market-data-research/other/telecoms-research/mystery-shopping-telecoms-disabled/>

gives rise to a serious concern that there is a risk of significant consumer harm within the UK communications market.

We will continue to advise Ofcom on the development of its Single Equality Scheme and particularly its disability action plan which sets out how Ofcom will ensure that it is a positive organisation for disabled employees and consumers.

ACOD Specific Work Areas

To take advantage of the synergy between the Panel and Ofcom's Advisory Committee on Older and Disabled People (ACOD) and to avoid potential duplication, cross-membership of the two bodies was established in Summer 2012. The remits of the bodies remain unchanged. This means that Members, in their ACOD capacity, also provide advice to Ofcom on issues relating to older and disabled people including television, radio and other content on services regulated by Ofcom as well as about issues concerning the postal sector.

Portrayal and participation

The number of people in the UK aged 65 and over is growing. Public Sector Broadcasting (PSB) remains very important to older consumers, who often use PSB channels as background content or as company. Older people watch more TV than any other group.

In response to the BBC Charter Review Public Consultation⁵⁸, we noted that the BBC has a worldwide reputation for quality programming. That programming is, on the whole, accessible to almost all UK citizens and is an important part of UK culture.

We advised that any move to reduce the scope of the BBC in UK broadcasting means running the risk that competitors invest less in original, high quality content - and less in content that is reflective of the full spectrum of the UK audience. The needs and expectations of the older audience - and their online connectivity - should be taken fully into account when considering the future of BBC content and delivery.

Viewers and listeners need to see themselves, their communities and wider society represented in content. Our response to the BBC Charter Review Public Consultation made reference to this, highlighting that there should be adequate portrayal of the Nations and Regions in network programming. We suggested that a new Charter should replace voluntary targets with new minimum levels for Nations' and Regions commissioning, ensuring they are represented widely on the network. Irish Gaelic, Scottish Gaelic and Welsh should continue to be represented on the BBC's output.

We referred to Ofcom's research into diversity in Public Sector Broadcasting (PSB)⁵⁹ which found that 51% of people with a disability think that there are too few people with

⁵⁸ <http://www.communicationsconsumerpanel.org.uk/downloads/ccp-acod20-20bbc20charter20review20draft20final20-20081015.pdf>

disabilities on the five main PSB channels. The UK population overall agrees, as 48% of all PSB viewers believe there are too few people with disabilities on screen. When asked to consider whether people with disabilities had been featured positively, 39% of disabled people said they thought that disabled people had been featured “very positively” or “positively”, compared to 43% of all PSB viewers.

We recognised the positive steps being taken by the BBC in increasing the representation of disabled people, such as the *Defying the Label* series, which followed the everyday experiences faced by a number of individuals with disabilities, impairments and facial disfigurement. We encouraged further work to tackle stigmas around mental illness, and increase understanding of cognitive or learning impairments, where it has been shown that the effects of the stigma can be as damaging to the individual as the effects of the illness or impairment⁶⁰.

⁵⁹ http://stakeholders.ofcom.org.uk/binaries/consultations/psb-review-3/statement/PSB_Diversity_Report.pdf

⁶⁰ <http://www.mentalhealth.org.uk/help-information/mental-health-a-z/s/stigma-discrimination/>

Annex 1: Financial report

	Actual 2015/16	Budget 2015/16
Panel Member Fees	109,556	110,015
Panel Member Expenses	16,314	13,665
Support (inc. Advisory Team, research, consultancy, stakeholder relationships and design and publications)	243,326	248,465

Annex 2: Panel Members

Jo Connell OBE DL (Chair)



After a career in IT, Jo retired as Managing Director of Xansa plc in 2003. She was a Trustee of Help the Aged from 1991 and Chair from 2004-2009 where she played a key role in facilitating and supporting the charity's merger with Age Concern England to create Age UK, the UK's largest older people's charity.

Since 2001 Jo's roles have included being a Non-Executive Director at many information technology and communications companies including RM plc and THUS Group plc. Jo was also Chair of the Hospice of St Francis, Berkhamsted, Master of the Information Technologists' Company in 2008/9 and Pro Chancellor and Chair of the Board of Governors at the University of Hertfordshire until August 2013.

Jo is currently Chair of the Worshipful Company of Information Technologists charity and a trustee of the Hertfordshire Community Foundation. In 2008 Jo was appointed a Deputy Lieutenant for Hertfordshire. In 2012 she was awarded the OBE for services to older people.

Jaya Chakrabarti, MBE



Cofounding digital agency Nameless, in 1999, Jaya has also launched a new social enterprise organisation, Semantrica trading as <https://tiscreport.org/>, in 2016, tackling slavery in supply chains with big data. Jaya is a passionate advocate for engaging business with community through technology to improve people's lives, and was honoured with an MBE in 2014, for services to the creative digital industries and the community in Bristol.

Outside work Jaya has engaged with projects focused on increasing democratic engagement, net neutrality, education, privacy, protecting children, women's rights and human rights. Jaya sits on a number of advisory boards including the University of Bristol Physics Department Business Advisory Board and more recently, the Bristol City Council Brexit Reference Group.

Jaya is a Research Fellow with the University of Northampton Business School, a Business Fellow at the University of the West of England.

Rhys Evans (Member for Wales)



Rhys Evans has worked on a range of consumer issues on behalf of vulnerable consumers across a number of sectors including retail, communications and energy in his previous role of Wales Director of Consumer Futures (formerly Consumer Focus Wales).

He was previously Chair of the Consumer Direct Wales Advisory Board, and has advised the Welsh Government on a number of consumer issues including customer service, consumer engagement, digital inclusion and financial inclusion.

Rhys runs his own business delivering coaching, mentoring and management training programmes. He is a member of the Association for Coaching and works as an associate to a number of organisations providing coaching, business development and training services.

Chris Holland (Member for England)



Chris Holland was Head of Specialist Dispute Resolution at BT where he was responsible for a wide range of specialist customer service areas, including all aspects of BT's membership of Ombudsman Services: Communications. He helped implement the telecommunications ombudsman service (Otelo), and until March 2011 was a non-executive director of the Ombudsman Service Ltd. He was Chairman of the Otelo Members Board between 2006-2011.

Chris held a number of customer services roles in BT, including heading the Chairman and Chief Executive's Service Office between 1987-2001. He was Chairman of the Postal Redress Scheme (POSTRS) between 2013-2015; and was an organisational healthcheck consultant with Time to Change (a mental health charity).

A qualified counsellor, Chris has done voluntary work with young people. Currently he acts as a consultant across all dispute resolution schemes offered by IDRS Ltd, including the Communications and Internet Services Adjudication Scheme (CISAS); he runs his own consultancy company; and he is a member of the Voice of the Listener and Viewer.

Richard Hill, MBE (Member for Northern Ireland)



Following degrees in Applied Maths and Church History, Rick worked as a parish minister for 17 years. He left church work in 2007 to develop a portfolio career.

He is Owner/Director of Titanic Gap Ltd, Media Consultancy, a Board member of the Independent Press Standards Organisation, and until May 2015, Chairman of the Consumer Council (Northern Ireland).

He has previously been, Chair of the Working Group on Consumer and Competition Policy for Scotland, Chair of Northern Ireland Screen Commission, Chair of Consumer Focus Post

and member of the Consumer Focus UK Board, a member of the BBC Audience Council for Northern Ireland and BBC Broadcasting Council for Northern Ireland.

Mairi Macleod (Member for Scotland)



Mairi Macleod was born and brought up in the north of Scotland and now lives in Glasgow.

She worked for 15 years in the field of access services for television, in particular subtitling - first with the Independent Television Facilities Centre (ITFC), then a long period with the BBC in London and Scotland, and latterly with Red Bee Media Ltd. Since 2009, she has been doing a variety of freelance work, including social policy research interviewing, training, subtitling and translating.

In 2009, she was appointed to Ofcom's Scottish Advisory Committee. Mairi Macleod is a volunteer for Deaf Connections, a charity based in Glasgow.

Craig Tillotson



Craig has enjoyed a successful and varied career over the last 30 years in the telecommunications and payments industries as a business unit leader, board director and strategy consultant. He gained substantial operations and strategic management experience within Vodafone and T-Mobile Groups. From 2001 to 2003 he was Product Management Director for Vodafone UK launching Vodafone Live and the original Mobile Broadband product set. In 2003 he became Strategy and Wholesale Director and in 2007 took over the leadership of the UK Consumer Business Unit.

In 2012 Craig was appointed as the first Chief Executive of the Faster Payments Scheme Limited. The Faster Payments Service is a world leading real time 24 x 7 retail payments service providing instant movement of money between customer accounts across all banks and building societies in the UK. As Chief Executive he is accountable for the day-to-day operational integrity and strategic development of the scheme and its services. Craig is also a director and Executive Chairman of Paym, the cross-industry mobile payments service launched in 2014.

In 2014 he was also appointed by the Financial Conduct Authority to be a member of the new Payment Systems Regulator Statutory Panel.

Bob Twitchin, MBE



Bob Twitchin was Chair of the Ofcom Advisory Committee for Elderly and Disabled People (DIEL) from 2000 to 2004 and a member of the Ofcom Consumer Panel (now the Communications Consumer Panel) from 2005 to 2008. He was a member of the steering group of PhoneAbility until 2015, a charity that was dedicated to improving access to ICT for older and disabled people. Bob is an Associate of Business Disability Forum.

Bob is a fellow of BCS, the Chartered Institute for IT, and formerly Chair of ITCanHelp, a network of volunteers providing free help with computing problems to disabled people at home, in day care centres or residential care. ITCanHelp is part of Abilitynet, a UK charity helping disabled people to use computers and the internet to change their lives at work, at home and in education.