



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

**2017-18**

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## Foreword

Communications services are integral to the everyday lives of consumers, citizens and micro businesses. The rapid rate of change in this sector and the significance of its role to people's lives and the UK economy mean that it is vital that the perspectives of consumers and micro businesses are at the heart of the debate. Treating all consumers fairly, including facilitating improvements in broadband and mobile coverage and quality of service continue to be at the forefront of the Communications Consumer Panel's and ACOD's agenda. Highlighting the interests of those who may not always be heard by the industry (for example, consumers in vulnerable circumstances) is an important part of our role, as is working with charities, consumer groups, communications providers (CPs), Ofcom and other policy and industry stakeholders.

The Panel works to influence before, during and after policy development - through a variety of methods and channels. Our work results in significant policy changes - we contribute expert advice to ensure consumers' interests are high on the agenda and we do not shrink from airing issues more widely when necessary. When we anticipate consumer detriment, or identify it occurring, we work with those who can make a difference - Ofcom, CPs and UK and National Governments.

The Panel's wide remit enables it to identify sometimes diverse projects that are apparently unrelated but raise similar consumer issues and ensure that there are connections made between them. Our sector specialism and expert experience and understanding allow us to robustly challenge telecoms policy development from a position of strength, supported by sound evidence and resulting in pragmatic actions based on real world solutions.

In the last year we've provided expert advice and guidance on a wide range of topics including future plans for the public switched telephone network, the broadband USO, early termination charges, auto-switching, auto-compensation, proportional billing and continuous handset charging. We've achieved a number of tangible gains for consumers in relation to stopping the unfair practice of charging for CLI, the provision of insightful information from the Alternative Dispute Resolution Schemes about the cases they consider and a significant monthly reduction in fixed voice line pricing. Our research into access services on on-demand/catchup services is helping to achieve parity for consumers who want to use these services in a digital world. Our value has been further recognised: Ofcom has updated its rules and from October 2018, Communications Providers will have a new, wider obligation to consult with the Panel with a particular emphasis on consumers in vulnerable circumstances.

Our role is vital in ensuring that the consumer voice is heard in relation to infrastructure. Infrastructure issues and the allocation of spectrum have wide ranging implications for consumers and citizens - affecting not only mobile coverage and broadband provision but also Freeview, radio and a panoply of white space devices. The Panel's understanding has enabled it to promote key changes, such as national roaming that would lead to significant benefits for consumers across the UK should it

be introduced. We have ensured that the need to support and protect more vulnerable consumers on the Freeview platform when spectrum planning changes are made is understood and planned for.

Collaboration, constructive challenge, facilitation of discussion informed by robust evidence and clarity of purpose remain central to our approach to ensure that the interests of consumers, citizens and micro businesses are protected and promoted, so that the opportunities offered by existing and emerging communications services are 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**

## Who we are - 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."*

Under the Communications Act 2003, 'Ofcom's consumer consultation arrangements must include the establishment and maintenance of a panel of persons with the function of advising both Ofcom and such other stakeholders as the panel thinks fit.' In performing this vital role, the Panel is a group of independent experts with direct sectoral experience, supported by a small team. We ensure the citizen and consumer voice is represented in communications policy development.

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.

Panel members are recruited in an open process and selected through interview. They have expertise in IT and technology; business and SMEs; mobile and mobile payments; customer service and complaint handling; broadcasting; employment practices; disability issues; accessibility; the needs of older people; social exclusion and vulnerability. There are four members of the Panel who represent the interests of consumers in England, Northern Ireland, Scotland and Wales respectively. They liaise with key stakeholders in the Nations to understand the perspectives of consumers in all parts of the UK and input these perspectives to the Panel's consideration of issues.

## What we do - citizen and consumer challenge and advocacy

The Panel's job is to ensure that the sector works for consumers, citizens and micro businesses - and in particular people who may be in a more vulnerable position in society.

We act as a "critical friend" to Ofcom, and are not a campaigning organisation. Our unique relationship with Ofcom, made possible by a Memorandum of Understanding, gives us early, confidential access to the regulator's thinking and means we can proactively influence decisions. This is a distinctive and defining characteristic of the Panel.

The communications market is complex, highly technical and fast-moving - and impacts across society and the economy. As a result, the Panel and ACOD's work is diverse and broad, covering not just telecommunications such as broadband, spectrum (mobile and TV airwaves) and mobile, but also post, broadcasting and digital inclusion. The sector presents different challenges to those in utilities such as energy and water;

in many ways it is closest to financial services in its complexity, vast range of providers and related competitiveness. Overall indicators of consumer satisfaction with the market risk masking individual service variations. An appreciation of the complexities of the market is vital if progress on consumer service is to be made - different services within the sector present different challenges. As Ofcom's recent research has found, while overall satisfaction among mobile customers was in line with that among current account customers, and above gas, electricity, post and landline customers, satisfaction among broadband customers was below all of these other sectors. An accurate and informed assessment of the issues is vital to addressing their resolution.

When we anticipate consumer detriment, or identify it occurring, we work with those who can make a difference - Ofcom, communications providers and UK and national governments. Our sector specialism and expertise mean we can challenge in a constructive environment, offer comprehensive advice and influence the development of policy so that it delivers good outcomes for consumers and citizens.

## How we work

By Ofcom sharing information and ideas in confidence with us from the very start of policy making, we can make early, robust, high quality interventions, ensuring that consumer and citizen interests are at the heart of Ofcom's thinking throughout. The level of trust we have fostered in the sector enables us to effectively influence communications providers and the regulator, and to hold Ofcom to account where appropriate.

We encourage stakeholders to look at issues through the eyes of people who use - or are excluded from using - communications services. We work collaboratively with an extensive network of stakeholders - including strong representation from the devolved Nations - and give insight to businesses, regulators and Government, many of whom attend our monthly Panel meetings.

As well as inviting organisations and individuals to Panel meetings to share knowledge and ideas, we are often contacted by those seeking our advice or input.

We have a small research budget, which we use in a highly focussed way to conduct in depth (usually qualitative) studies on specific topics and themes. This has contributed evidence and insight to Ofcom's and others' work - and is welcomed by communications providers and other stakeholders.

Much of our work takes place electronically in between our monthly meetings; additionally, we meet regularly with Ofcom, communication providers and other stakeholders in order to advocate for the consumer. The Panel's activity is often behind the scenes, shaping policy as it is just starting to develop; and outcomes are often long term. Our intention is 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.

## Influencing the debate - consultation responses

Consultations are a valuable and effective means to position a consumer perspective at the very heart of the decision-making process. Our responses are informed equally by research, and by the valuable information and evidence shared with us by stakeholders and other consumer groups.

In 2017-18 our responses were:

- Communications Consumer Panel and ACOD's response to Ofcom's Diversity and Inclusion Programme 2018-2022 *February 2018*
- Communications Consumer Panel and ACOD's response to Ofcom's Annual Plan 2018-19 *February 2018*
- Communications Consumer Panel and ACOD's response to Citizen's Advice's draft consumer work plan 2018-19 *February 2018*
- Communications Consumer Panel and ACOD's response to Ofcom's consultation on making electronic programme guides (EPGs) more accessible *February 2018*
- Communications Consumer Panel and ACOD's response to the General Consumer Council for Northern Ireland's 2018-19 Work Programme *February 2018*
- Communications Consumer Panel and ACOD's response to Ofcom's consultation on clarifying how mobile numbers can be used by Communications Providers *December 2017*
- Communications Consumer Panel and ACOD's response to Ofcom's consultation on its broadband speeds codes of practice *November 2017*
- Communications Consumer Panel and ACOD's response to Ofcom's consultation on revisions to its CLI guidance *November 2017*
- Communications Consumer Panel and ACOD's response to DCMS's consultation on the design of a USO for broadband *October 2017*
- Communications Consumer Panel and ACOD's response to Ofcom's call for inputs on helping consumers engage with communications markets *September 2017*
- Communications Consumer Panel and ACOD's response to CAP and BCAP consultation on broadband speed claims in advertising *July 2017*
- Communications Consumer Panel and ACOD's response to Ofcom's consultation on mobile switching - 'auto switch', better information for consumers and the removal of notice periods *June 2017*
- Communications Consumer Panel and ACOD's response to Ofcom's consultation on automatic compensation *June 2017*
- Communications Consumer Panel and ACOD's response to Ofcom's call for inputs on its review of ADR schemes *May 2017*
- Communications Consumer Panel and ACOD's response to Ofcom's consultation on a review of the market for standalone landline services *May 2017*

- Communications Consumer Panel and ACOD's response to the Scottish Government's call for evidence on a Consumer and Competition Taskforce April 2017

## 2017-18 work areas

The Panel's Work Plan, which we consult on and publish annually, explains our priorities for the coming year and sets out the areas that we will address. In 2017-18 we undertook a range of work on the following key areas of engagement and research projects:

### Key Areas of Engagement:

- Broadband/mobile coverage and quality of service
- Nuisance calls
- Unfair policies and practices
- Customer service and complaints handling
- Vulnerability
- Access to broadcast and on-demand content

### Research:

The consumer experience of making complaints to communications providers

### Areas remaining under review:

- Progress on consumer related objectives highlighted in the Strategic Review of Digital Communications including pricing complexity, consumer information and switching
- Digital Participation
- Future plans for the public switched telephone network (PSTN)
- Affordability and debt
- Post - quality of service
- Internet of things, data privacy and security
- Micro businesses' experience of communications
- Non-geographic calls
- Spectrum Strategy

### ACOD specific work areas:

Inclusion, portrayal and participation



## Key areas of engagement

Our job is to highlight where and when the communications sector is at risk of not working for consumers. This ranges from identifying and militating against the risk of potential detriment happening in the first place, to suggesting solutions when harm does occur, and to working with all parties to find workable resolutions and improvements. We do this by focusing our resources on a number of key areas of engagement where we feel there are not only critical issues, but also where we feel we can make a difference.

As we move rapidly to a 'digital by default' culture, it is critical for the UK to have a robust infrastructure, both broadband and phone; a reliable and competitive postal service; accessible services; and redress for when these things go wrong. As consumers, we are severely disadvantaged if we do not have access to these services and as an economy and society we need them to be resilient and competitive.

## Broadband speeds, broadband/mobile coverage and quality of service

Ofcom estimates that 4% of the UK (1.1 million premises) still cannot receive broadband speeds of at least 10Mbps<sup>1</sup>. The announcement of a regulatory broadband USO is a significant step, for which the Panel advocated and which we have welcomed. We supported an initial 10Mbps USO minimum guarantee and the capacity to increase to meet consumer demand and expectation.

We also think it is vital that consumer information is consistent, transparent and accessible - setting out clearly consumers' rights, including priority fault repair and complaint handling.

The 2020 timetable is tight and we have urged that concentrated efforts are required to meet this target. We have reiterated to both Government and Ofcom that we believe that efforts to stimulate the take up of broadband and encourage digital engagement should feature in the planning and implementation of the USO, and that micro businesses and consumers in vulnerable circumstances should be given particular focus.<sup>2</sup> We have long called for, and have welcomed, Government plans for free basic digital skills training for consumers at risk of being left behind.

In 2018/19 we would like to see Ofcom encourage communication providers to improve coverage so that fewer households are dependent on the USO.<sup>3</sup>

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<sup>1</sup> [https://www.ofcom.org.uk/\\_\\_data/assets/pdf\\_file/0024/108843/summary-report-connected-nations-2017.pdf](https://www.ofcom.org.uk/__data/assets/pdf_file/0024/108843/summary-report-connected-nations-2017.pdf)

<sup>2</sup> <https://www.communicationsconsumerpanel.org.uk/downloads/ccp-acod-response-to-dcms-broadband-uso-october-2017.pdf>

<sup>3</sup> <https://www.communicationsconsumerpanel.org.uk/downloads/ccp-acod-response-to-ofcom-annual-plan-9-february-2018.pdf>

## Consumer information about broadband speeds

In terms of broadband speeds, we have long called for the replacement of the term “up to” with an indicative estimate labelled “at least”, to give consumers more certainty that the service they are buying will provide them with an assured minimum speed rather than a notional possible maximum speed that in reality they are unlikely to ever receive. Accordingly, we advised on Ofcom’s revised Broadband Speeds Code of Practice and wrote in support of CAP and BCAP’s proposal to make the wording used in broadband advertising more meaningful and less likely to mislead consumers<sup>4</sup>.

We believe there remains a strong case for proportional billing to be implemented when broadband speeds are not delivered as advertised and a consumer does not have the option of another service provider. We have urged Ofcom to consider how it can move the market in this direction, so that consumers are better served.<sup>5</sup>

## Mobile coverage

In regard to mobile coverage, the Panel believes that effective spectrum management is essential and we have encouraged Ofcom to demand that mobile network operators (MNOs) develop contingency plans for the predictable areas where coverage is poor or non-existent<sup>6</sup>.

We have pressed Ofcom to encourage better use of currently-held spectrum and enforce a ‘use it or lose it’ policy. We have also pressed for future spectrum allocations to best serve consumers by Ofcom obliging MNOs to meet or exceed agreed coverage targets; and if they do not do so, to financially penalise them.

We were pleased therefore to see reference to spectrum sharing in Ofcom’s Annual Plan. Having a strategy for dynamic spectrum sharing will be vital for the growth of the Internet of Things and the associated economies of scale. We believe that future spectrum auctions should be crafted so that operators are obliged to cater for the hard-to-reach areas from the start of the process - sometimes known as an ‘outside-in’ approach. This would prioritise providing reliable services to groups of consumers and citizens who have been consistently disadvantaged.

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<sup>4</sup> <https://www.communicationsconsumerpanel.org.uk/downloads/ccp-acod-response---cap-and-bcap-consultation-on-speed-claims-in-broadband-advertising-final-july-2017.pdf>

<sup>5</sup> <https://www.communicationsconsumerpanel.org.uk/downloads/ccp-acod-response-to-ofcom-annual-plan-9-february-2018.pdf>

<sup>6</sup> <https://www.communicationsconsumerpanel.org.uk/downloads/07022017-ccp-acod-response-to-ofcom-annual-plan-2017-18-final.pdf>

## Nuisance calls and ease of reporting

Nuisance calls and SMS messages are a major cause of consumer irritation, anxiety and distress, and can cause micro businesses to waste valuable resources. Ofcom estimates that each year UK consumers receive about 3.9 billion nuisance calls<sup>7</sup>. These affect consumers in Scotland to an even more worrying degree and following on from the work of the Nuisance Calls Commission, which the Panel was heavily involved in, we continue to engage fully in stakeholder efforts to tackle this plague on people in their own homes across the UK.

We have highlighted call blocking at a network level as a useful tool to help prevent nuisance calls reaching consumers, so we were pleased that BT joined Talk Talk and Vodafone in providing this service.

However, this is a complex area; call blocking services do not guarantee an end to nuisance calls. There is no single solution, a collaborative, unified approach is needed, involving governments, regulators and industry - both here and internationally.

## Unfair policies and practices

### *Charging for Caller Line Identification*

The Panel has been addressing several issues that we consider to be unfair to consumers. One of these is the unfair practice by CPs of charging for Caller Line Identification (CLI). CLI provides protection and peace of mind by allowing consumers to see who is calling them, so that they can answer the phone without fear of receiving a nuisance call. Charging for this protection is unfair, particularly as people who rely on their landline tend to be older/disabled/on lower incomes, so we are delighted that Ofcom has agreed and has enabled CLI to be provided free to all consumers.

We pressed Ofcom to mandate this requirement and strongly supported its inclusion in the update of the General Conditions that communication providers must adhere to by October 2018.

### *Eight-week referral period to ADR*

The Panel's view on Alternative Dispute Resolution (ADR) remains unchanged - and is outlined in detail below - but essentially we believe that having to wait eight weeks in order to seek redress if a deadlock letter has not been issued is unacceptable. We have continued to call for a reduction in the eight-week referral period and have noticed a shift in industry views on this.

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<sup>7</sup> [https://www.ofcom.org.uk/\\_\\_data/assets/pdf\\_file/0023/110957/nuisance-calls-joint-action-plan-2018.pdf](https://www.ofcom.org.uk/__data/assets/pdf_file/0023/110957/nuisance-calls-joint-action-plan-2018.pdf)

Additionally, we have been calling for publication of information about ADR complaints, and greater publicity of ADR in general. We believe that reform is needed. We would like to see Ofcom stringently holding providers to account for improving their performance and improving the usefulness of complaints data for consumers, by publishing data on the number of complaints referred to ADR, as well as linking to data on case outcomes.

#### *Call costs - access charges*

Since 1 July 2015, the cost of calling service numbers has been made up of two parts: an access charge, the part of the call charge that goes to the phone company; and a service charge, which is the rest of the call charge set by the organisation you are calling.

The Panel has serious concerns about a lack of awareness of access services charges and the levels at which they are set, and we have raised this matter with Ofcom<sup>8</sup>.

#### *Parcel surcharging*

In regard to postal services, parcel surcharging in rural and high-density urban areas is unfair to consumers - this is particularly detrimental as the rural population is also generally older. Consumers in hard-to-reach locations are facing either being disenfranchised or bearing prices that far outweigh the cost to deliver to them.

The Panel has called for collaboration by organisations in the parcel delivery pipeline to ensure people living and working in rural areas are not unfairly charged.

#### *Fixed voice line pricing*

Another unfair practice that disproportionately affects older people, as well as people on lower incomes, is the cost of a fixed line only service. In recent years, consumers on landline only contracts have paid disproportionately increasing prices that are counter to the reduction in underlying wholesale costs, as highlighted in Ofcom's standalone landline market review.

The Panel recommended a significant price adjustment for the affected consumers. We welcomed Ofcom's proposals to define this as a specific market requiring protection and the outcome that BT, with over 70% of that market, has reduced its charge by £7 per month for customers with a line only. We have been pleased to see some of BT's competitors following suit and reducing their prices.

#### *Handset charges*

We are also calling for an end to the unfair practice of continuous handset charges. Ofcom's Pricing Trends Report 2017<sup>9</sup> found that around two-thirds of consumers using post-pay (pay monthly etc.) mobile services have a handset included in the price of their service - and, of those, one million customers (6%) were out of their minimum

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<sup>8</sup> <https://www.communicationsconsumerpanel.org.uk/downloads/ccp-acod-response--clarifying-07-numbers-.pdf>

<sup>9</sup> [https://www.ofcom.org.uk/\\_\\_data/assets/pdf\\_file/0028/98605/Pricing-report-2017.pdf](https://www.ofcom.org.uk/__data/assets/pdf_file/0028/98605/Pricing-report-2017.pdf)

contract period. Of those one million consumers, 72% were continuing to pay a similar monthly tariff compared to when they signed up - so although they had paid off the cost of their handset, they were still being billed for it.

The transparency of offering the separation of the handset and service element of the tariff is by no means common practice across the industry and we have encouraged CPs to make it so. Additionally, consumers who switch from a handset-inclusive tariff to a SIM-only tariff with the same provider should not lose the benefits they had signed up to under the original tariff - this is a point we have raised with CPs.

### *Early Termination Charges*

We have been in talks with CPs and Ofcom about the unfair practice of early termination charges for customers that move home to an area without their CP's coverage. We are pleased that Ofcom has responded by opening an investigation into this and other unfair early exit fees<sup>1011</sup> and look forward to a positive resolution.

## Consumer engagement, customer service and complaints handling

We have contributed to a number of Ofcom initiatives, for example:

- We advised on the accessibility of data, the initial Comparing Service Quality report and its ongoing development, as well as our interventions in a range of early policy formation<sup>12</sup>. Although we recognise that customer service and complaint handling is an ongoing work area, we were disappointed that this was not a key area of focus within Ofcom's work programme in its Annual Plan and responded to the Annual Plan consultation accordingly.<sup>13</sup>
- We cautiously welcomed Ofcom's proposals to introduce an Auto-Switch process for mobile customers, though we are disappointed that the opportunity for a fully gaining provider led process across all communications services had not been taken.
- The Panel welcomed the introduction of automatic compensation, but we have cautioned Ofcom to be vigilant to ensure the costs of this are not indirectly passed to consumers by providers. We believe that it is essential that Ofcom takes into account the cost to CPs of their current way of dealing with disputes: it is possible that a good automatic compensation scheme supported by good communication to consumers will mitigate overall costs. Additionally, providers with a better record in service quality performance should have less to pay out and

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<sup>10</sup> [https://www.ofcom.org.uk/about-ofcom/latest/bulletins/competition-bulletins/open-cases/cw\\_01198](https://www.ofcom.org.uk/about-ofcom/latest/bulletins/competition-bulletins/open-cases/cw_01198)

<sup>11</sup> [https://www.ofcom.org.uk/about-ofcom/latest/bulletins/competition-bulletins/open-cases/cw\\_01217](https://www.ofcom.org.uk/about-ofcom/latest/bulletins/competition-bulletins/open-cases/cw_01217)

<sup>12</sup> <https://www.communicationsconsumerpanel.org.uk/downloads/ccp-acod-response-to-ofcom---helping-consumers-engage-in-communications-markets---15-september-2017.pdf>

<sup>13</sup> <https://www.communicationsconsumerpanel.org.uk/downloads/ccp-acod-response-to-ofcom-annual-plan-9-february-2018.pdf>

will theoretically be able to invest more in their infrastructure and new innovations.

## Vulnerability

The Panel has continued to make consumers in vulnerable circumstances a key priority area for the past year. We have welcomed Ofcom's continued focus on vulnerable consumers and have urged Ofcom to consider people in vulnerable circumstances in every consumer policy. Any consumer may feel vulnerable in their dealings with the communications market at any time and it is vital that CPs are flexible in their processes to make navigating the market and using CPs' processes hassle-free.

In our response to Ofcom's recent review of its General Conditions we supported the more holistic view of 'vulnerability' and Ofcom's proposal to require CPs to establish, publish and implement clear and effective processes and procedures in relation to consumers whose circumstances make them more vulnerable.

In recognition of our role in this regard, Ofcom strengthened the requirement for CPs to engage with us and made it a specific requirement for them to do so in relation to their support for consumers in vulnerable circumstances.

## Access to broadcast and on-demand content

The delivery of audio-visual content has been transformed in recent years. Although more people are watching TV via 'catch up' or on-demand programming, there are proportionally fewer accessible programmes for those with a sensory impairment than are available on traditional 'linear' or time-specific TV: Ofcom's Access Services Report published December 2017 showed that 62% of on-demand programming did not offer any accessibility provision<sup>14</sup>.

We believe that, as far as practicable, everyone should have the opportunity to take advantage of these developments and have equivalent access to both broadcast and on-demand content.

Our research, *Access to broadcast and on-demand content: Time to Catch Up!*<sup>15</sup>, published in October 2017, looked at the availability, awareness and use of subtitles, signing and audio description for TV and on-demand programming.

As well as highlighting an appetite for greater provision of access services across the media landscape, our research revealed that more awareness is needed of what there is available. We have worked with Ofcom, Action on Hearing Loss, RNIB and other stakeholders to help promote awareness of access services and will continue to be part

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<sup>14</sup> [https://www.ofcom.org.uk/\\_\\_data/assets/pdf\\_file/0024/108672/report-odps-accessibility.pdf](https://www.ofcom.org.uk/__data/assets/pdf_file/0024/108672/report-odps-accessibility.pdf)

<sup>15</sup> <https://www.communicationsconsumerpanel.org.uk/access-to-broadcast-and-on-demand-content-time-to-catch-up/access-to-broadcast-and-on-demand-content-time-to-catch-up>

of the fight for improved quality and availability.

We have long called for improvements to Ofcom's EPG Code to make EPGs more accessible and therefore support Ofcom's strengthened proposals.

## Research

This year, the Panel commissioned qualitative research into consumers' experiences of complaints handling and ADR in the telecoms sector, which we will publish this summer. Building on the findings and best practice gleaned from our 'Going Round in Circles' research (published 2013) and our 'We're not all the Same' research (published in 2015) we wanted to understand what progress has been made and where Ofcom and industry still need to focus their efforts. We strongly believe that complaint-handling and ADR should be a straightforward, clear and hassle-free journey for every consumer who has a reason to complain.

## Areas under review

### Implementation of policies set out in the Strategic Review of Digital Communications ('the DCR')

The DCR set out Ofcom's approach to regulating the communications market for the next decade. As well as better broadband and mobile coverage, the reform of Openreach and the intended resultant investment in fibre, the Review contained specific initiatives relating to consumers and improving the quality of service they receive.

We have seen significant progress on issues that we have raised, for example in the plans to introduce automatic compensation, to make switching easier and to provide clearer information for consumers. However, in others progress seems thwarted; the Panel has expressed concerns about the length of time it seems to be taking for consumers to enjoy the direct benefits flowing from the separation of Openreach, and aspects of customer service and complaint handling need significant improvement.<sup>16</sup>

### Digital Participation

Ofcom's Media Use and Attitudes Report 2017 revealed that 14% of adults in the UK are still non-users of the internet, the same as in 2015. One in three (35%) adults aged 65-74 are non-users, as are a majority (56%) of those aged 75 and over. A quarter of adults in DE households (27%) are non-users.<sup>17</sup>

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<sup>16</sup> <https://www.communicationsconsumerpanel.org.uk/downloads/ccp-acod-response-to-ofcom-annual-plan-9-february-2018.pdf>

<sup>17</sup> [https://www.ofcom.org.uk/\\_\\_data/assets/pdf\\_file/0020/102755/adults-media-use-attitudes-2017.pdf](https://www.ofcom.org.uk/__data/assets/pdf_file/0020/102755/adults-media-use-attitudes-2017.pdf)

Our Digital Footprints research showed that even for those people that are online, many still lack confidence. We have reiterated to both Government and Ofcom that we believe that efforts to stimulate take up of the USO should also encourage digital engagement, and that micro businesses and consumers in vulnerable circumstances should be given particular focus.<sup>18</sup>

### Future plans for the public switched telephone network (PSTN)

Approximately 1.5 million adults live in homes with a landline and no mobile phone or internet - 40% of these consumers are aged 75 and over<sup>19</sup>. The Panel's focus is to ensure that the migration from the PSTN to Voice Over Internet Protocol (VoIP) occurs without detriment to consumers - in particular, ensuring lifeline services are protected to enable people access to emergency services. We are concerned not only about the plight of land-line only consumers who do not regularly use a smartphone, but also of all consumers who may need access to the emergency services.

The Panel is also concerned about IP network resilience in emergency situations and cyber security. We are engaging with stakeholders and policy-makers who have an influence over the way migration and related communications take place.

### Affordability and debt

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

We have urged Ofcom to require that the debt collection policies of providers are governed by a more specific Code of Practice, that is easily accessible to all and not buried within Terms and Conditions or hidden in the small print. In addition, this should be linked to advice and support for consumers in vulnerable situations, including advice on steps to help avoid or mitigate debt.

### Post - quality of service

The Panel believes that it is vital to maintain a universal postal service that meets the needs of all consumers. This universal service must be financially sustainable, fit for purpose and, crucially, affordable. In May 2018 Royal Mail announced<sup>20</sup> that it had not met some of the quality of service targets that were set out for it in 2017/18. The targets are designed to ensure a satisfactory level of service for all consumers, citizens and micro businesses.

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<sup>18</sup> <https://www.communicationsconsumerpanel.org.uk/downloads/ccp-acod-response-to-dcms-broadband-uso-october-2017.pdf>

<sup>19</sup> [https://www.ofcom.org.uk/\\_\\_data/assets/pdf\\_file/0015/107322/standalone-landline-statement.pdf](https://www.ofcom.org.uk/__data/assets/pdf_file/0015/107322/standalone-landline-statement.pdf)

<sup>20</sup> <https://www.royalmailgroup.com/royal-mail-quality-service-15>



We have encouraged Ofcom's continued focus on this and were pleased that Ofcom has decided to open an investigation to determine whether there are reasonable grounds for believing that Royal Mail has failed to comply with its obligations as Designated Universal Service Provider<sup>21</sup> in respect of the financial year 2017/18.

### Internet of things, data privacy and security

Consumer confidence and trust in their provider, the Government and others were subjects of focus in the Panel's November 2016 report - Digital Footprints<sup>22</sup>. We recommended that all CPs should provide a free, basic, but robust level of security protection and we have been pleased to see that in recent months BT has enhanced its free security software.

We have worked with DCMS in the formulation of its Security by Design report and Code of Practice and have encouraged others to do the same. We hope the Code of Practice will help provide much needed standards and guidance in this area.

### Micro businesses' experience of communications

There are 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 18% of turnover. We have called for greater support for this growing market sector from Ofcom and CPs, to help them maximise the opportunities presented by communications services.

Tailored tariffs and more flexible contractual terms that are currently only available to larger corporations would enable micro businesses to compete with larger competitors on a more level playing field. A residential-style supply but with enhanced support, as well as improved service levels and response times to service faults should, in our view, be on offer. We urged Ofcom to include these businesses in consumer research and engagement work, which it has done, so that micro-businesses' needs can be taken into account and measures put in place to overcome barriers.

We believe there is also a need to ensure improved co-ordination between multiple providers in the value chain around a single customer - particularly customer-facing and wholesale providers.

### Non-geographic calls

The Panel has supported Ofcom's review of costs to directory enquiries (118) services. However, as highlighted under 'Unfair Practices' we have also discussed with Ofcom the need to monitor the costs of access charges by CPs. We consider that these charges should be fair, clear and upfront, so that there are no nasty surprises for consumers when receiving their bills.

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<sup>21</sup> Condition 1.9.1

<sup>22</sup> <https://www.communicationsconsumerpanel.org.uk/research-and-reports/digital-footprints>

## Spectrum Strategy

Responsible and creative use of spectrum is, we believe, increasingly necessary to meet demand. Details of our work in this area can be seen under 'Mobile Coverage'.

## ACOD-Specific Work Areas

In our ACOD capacity, we have continued to encourage Ofcom to set itself a high standard and to encourage the promotion of diversity, equality and equality of opportunity in its stakeholders. In broadcasting, on-screen portrayal of disabled people and older people is a live and important issue.

We responded to Ofcom's consultation on the latest version of its Diversity and Inclusion Programme. We will continue to push for higher standards in accessibility in TV and on-demand services<sup>23</sup>.

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<sup>23</sup> <https://www.communicationsconsumerpanel.org.uk/downloads/ccp-acod-response-to-ofcom-how-should-odps-accessibility-be-improved--3-april-2018.pdf>

## Annex 1: Financial report

	<b>Actual 2017/18</b>	<b>Budget 2017/18</b>
<b>Panel Member Fees</b>	98,412	62,993
<b>Panel Member Expenses</b>	11,842	12,950
<b>Support (inc. Advisory Team, research, consultancy, stakeholder relationships and design and publications)</b>	212,944	212,303

## 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.

### Amanda Britain (Member for Scotland)



Amanda has experience spanning research, public services, and organisational change in Scotland. In all roles, she has championed the interests of people who are socially or economically excluded. She is currently supporting Scotland's national [Technology Enabled Care Programme](#), is an advisor with [Life Changes Trust](#) dementia programme, and an associate with [Healthcare Improvement Scotland](#).

In 2012, Amanda was appointed a Board Member of the [Chartered Institute of Housing in Scotland](#), and in 2016 was elected Chair. She is Vice Chair of [Iriss](#), a charitable company that aims to build the capacity and capability of the social services workforce in Scotland, and a member of [Alzheimer Scotland](#)'s Human Rights and Public Policy Committee.

In parallel, Amanda has chaired the [Peter Gibson Memorial Fund](#), which in September 2016 published [Championing Consumers, a history of consumer advocacy in Scotland 1974-2014](#).

## Jaya Chakrabarti, MBE



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's honours list, 'For services to the Creative Digital Industries and the community in Bristol'.

Jaya co-founded digital agency [Nameless](#) in 1999, which became one of the leading creative digital agencies in Bristol. Jaya worked closely with clients including the RFU, Cancer Research, Sony Playstation, Warner Bros, the Home Office and the Food Standards Agency. Following her MBE Jaya set her sights on tackling modern slavery using big data, and set up the social enterprise [TISCreport.org](#) in 2014 (Transparency In Supply Chains Report). TISCreport.org is now the world's largest open data anti-slavery register, built to Government standards, with over 42k organisations with applicable modern slavery statements. It has gathered momentum incredibly quickly and is officially backed by Welsh Government.

Outside work Jaya has led projects on democratic engagement, net neutrality, education, privacy, protecting children, women's rights and human rights. Jaya presently serves as Vice President of the Bristol Chamber of Commerce and Initiative. Locally, she has been involved in many cross-sector initiatives with education and technology to increase social inclusion through the use of technology.

## 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 deliver 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.

Rhys' term with the Panel concluded in December 2017.

## 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 organisation 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 an occasional 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](#). Chris was also appointed as Independent Complaint Reviewer for the Centre for Effective Dispute Resolution (CEDR) in November 2016.

## 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, and Deputy Chairman of the [Independent Press Standards Organisation](#).

He has previously been Chair of [Northern Ireland Screen Commission](#), Chair of the General Consumer Council for Northern Ireland, 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. He was made MBE for services to Broadcast Media 2014.

## Craig Tillotson



Craig has enjoyed a successful and varied career over the last 30 years in the telecommunications and payments industries as a chief executive, 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.

Craig graduated from Cambridge University with a degree in Computer Science and spent the early part of his career as a strategy consultant with McKinsey & Company. For many years he was a specialist telecommunications reserve officer in the Royal Corps of Signals where he was awarded the Territorial Decoration (TD).

From 2012, until their merger with other central payment schemes in 2018, Craig was the Chief Executive of the [Faster Payments Scheme Limited](#) and Executive Chairman of [Paym](#), the cross-industry mobile payments company. From 2014 to 2018 he was one of the inaugural members of the new [Payment Systems Regulator's statutory Panel](#).

In 2018 Craig co-founded, and became Chief Executive of the Smart Request Company Ltd, a FinTech start-up.

## Richard Williams



Richard Williams is the Managing Director of [Freeney Williams Ltd](#), a disability and diversity consultancy. He is a Chartered Fellow of the [Chartered Institute of Personnel and Development](#), an Associate of both [Business Disability International](#) and the [Business Disability Forum](#) and is the Chair of [Age UK Brighton and Hove](#).

Richard is an experienced consultant and trainer with expertise in all areas of disability and their impact on individuals and organisations. Richard joined the Panel and ACOD in February 2018.