



Communications
Consumer Panel

Advisory committee for older
and disabled people



Panel Defnyddwyr
Cyfathrebiadau

Pwyllgor Cyngori Pobl
Hŷn ac Anabl

Our strategic plan for 2022/23

Executive Summary: Reviewing our plans

In 2020/21 we set our strategic plan for the three years ahead. Our high-level priorities were:

- Universal availability of communications services
- Excellent standards of service and of customer service
- No consumer 'left behind' regardless of circumstances
- Prevention of consumer harm

We updated our priorities for the 2021/22 year, to take account of the peak impact of the pandemic, to:

- Universal availability of communications services (expanding this priority to ensure a focus on *basic, secure, affordable, reliable, resilient communications services that are both accessible and usable across a variety of devices.*)
- Excellent standards of service and of customer service (we retained this as a priority)
- No consumer 'left behind' regardless of circumstances (we retained this priority in spirit, combining it with aim one, noting that universal availability of communications services should mean universal accessibility and usability too)
- Prevention of consumer harm (we highlighted protection from scams and from unintended negative consequences of migration to VoIP as two forward-looking examples)

These individual priorities supported our overarching aim of ensuring that the consumer voice was heard - and acted upon - by policy makers and industry.

To fulfil this aim, we:

- worked with other consumer bodies, industry, Ofcom and governments, and
- informed the debate by commissioning:
 - five pieces of high quality, independent consumer research into issues affecting the communications sector;
 - two 'immersion' sessions, where the Panel heard directly from consumers across the UK about what is most important to them; and
 - a thoroughly-researched 'think piece' by Graeme K Whippy MBE, a respected accessibility expert, experienced in helping businesses provide excellent customer service to all their customers. The think piece was aimed at empowering advocates

in the communications sector to provide a business case for inclusivity, with practical suggestions on steps to take.

This document explains our proposed priorities, overarching themes affecting consumers, citizens and micro-businesses in the communications sector, and some of the policy areas that highlight the need to prioritise on the issues we have selected.



Working collaboratively to provide a voice for consumers, citizens and micro businesses using or affected by communications services

We continue to be grateful for the time and commitment our stakeholders have given to highlighting the issues affecting communications consumers, citizens and micro businesses at a time when digital connectivity and access to a landline and a regular postal service have been valued and relied upon more than ever before.

We value highly our engagement with a range of organisations, from UK-representative consumer bodies, to small and specifically-focused charities. This means that we can remain alert to both the effect of wide-ranging issues affecting many consumers or citizens - and also the impact of more niche issues on smaller groups of communications consumers, micro businesses or citizens. This helps to inform our research programme each year. We also recognise the importance of cross-sector collaboration and learning from other sectors so will continue to engage and strengthen relationships with organisations in other sectors.

Our work with industry, Ofcom and government bodies helps us to understand how we can most effectively highlight the consumer, citizen and micro business voice to help inform their plans.

Looking forward: Building on our strategic priorities

The communications market is dynamic, fast-paced and continually evolving. Adopting a flexible approach to our strategic plan means that, as the sector evolves, we can continue to ensure that the voices and interests of consumers, citizens and microbusinesses are heard in the communications sector. While we remain alert to developments across the sector, we continue to focus on the strategic priorities that we've consulted upon under our current remit.

When reviewing our plans and looking at the value the Panel and the Advisory Committee for Older and Disabled people (ACOD) can add in the year ahead, we asked ourselves the following questions:

1. What have we learned from our work programme?
2. What are the future challenges that we can help to address?
3. What don't we know?

As the impacts of the pandemic have continued to affect society and the communications sector, the key priorities we outlined for the 2021/22 year have ensured we clearly focus our work to protect and promote the voice of consumers, citizens and micro businesses during these difficult times.

We need to work together with our stakeholders to ensure that progress continues. Overarching themes we are continuing to hear from our stakeholders and from participants in our research hand insight programme include:

Inclusivity:

The communications sector still needs assistance in making its services inclusive to everyone. While coverage is improving across the UK, there is a gap between those who are able to afford and easily use it and those who cannot: because they live or work in areas of poor or unreliable coverage; struggle to pay their bills; lack the digital skills and confidence to engage online effectively and safely; or require additional support to use telecoms, TV or postal services, because the services have not been designed to be used easily and affordably by people with physical or cognitive disabilities, mental health problems, or low fluency in English. We have heard terms such as ‘communications poverty’ from our stakeholders, indicating that consumers are still feeling left behind.

Vulnerability:

We believe there should be a consistent and fair way of recording consumers’ additional requirements to make them less vulnerable in the communications market. Any consumer can become ‘vulnerable’ for the short or longer term and we have been working with communications providers to help raise standards of customer care for people who may be seen as more ‘vulnerable’. The first step in being able to provide better support is to be able to identify who requires it and what they need, under what circumstances. A practical application for this forethought around recording vulnerability data so that all consumers can use communications services safely and confidently is in the digital telephony switchover, also known as Migration to VOIP. We set out our current concerns about the handling of migration, later in this report.

Resilience:

Building on our concerns about migration to VoIP, we are concerned about outages to communications services - from power outages, to mobile network downtime, to the recent outages to access services in broadcast and on-demand TV programme services. We are keen to see that monitoring and redress are in place to ensure prevention from outages and protection and suitable compensation for those affected.

We propose to continue to focus on these broad themes, reflecting people’s needs throughout the enduring impact of the pandemic.

Having listened to consumers, consumer bodies, charities and other organisations on how essential communications services are to people, we have strengthened the wording of our strategic priorities.



Strategic Priorities - strengthening the consumer voice in our priorities

Universal availability of communications services *as a right for all*

- Consumers across the UK need access to basic, secure, affordable, reliable, resilient communications services that are both accessible and usable across a variety of devices. In turn, this will help consumers participate digitally and tackle the digital divide.
- Consumers also need the skills and confidence to navigate the communications market, participate digitally and stay safe online.
- The strengthened wording of this priority reflects our belief that communications services should be a basic right for all UK citizens.

Excellent standards of service and of customer service *for everyone, by design and throughout the customer lifecycle*

- We have further strengthened our view that excellent standards of service and customer service are vital for consumers, during, after and well beyond the pandemic.
- The strengthened wording of our priority highlights our understanding and belief that all consumers' needs and requirements should be considered from the outset by companies who provide communications services. To do that they need to seek the input of consumers and regularly check the accessibility and usability of their services and customer service.
- Our think piece, by Graeme K Whippy MBE, along with input from our Hub participants and our research, have supported our view that more can and should be done to make the communications sector inclusive and a frictionless experience for everyone.
- Consumers with a wide range of access requirements should be able to get the support they need from providers while looking for the best deal, signed up to receive a service and when terminating their contract with that provider, without battling through bureaucratic processes. The likelihood of a large minority of consumers having additional requirements should be considered from the design stage, throughout, so that communications providers build flexibility and fairness into their culture.

Listening to the consumer voice: getting to know consumers and their experiences so that lessons can be learnt

- We believe that our research and insight programme and our engagement with consumer stakeholders help us to make a difference by enabling us to input the consumer voice into policy-making and industry. However, we also believe that industry can use its own data to better understand what consumers need and what needs to be changed.
- Communications providers should seek to gain greater insight from their data on complaints, feedback, loss or retention of customers and the impact of network

outages. As there are many consumers who find complaints processes difficult, time-consuming or intimidating, we also recommend that providers and Ofcom review social media for feedback.

- As stated above, we believe that consumers - particularly consumers who require additional support - should benefit from consistently good standards of service and customer service across providers. To achieve this, providers should work to better get to know their individual customers' requirements - consistently record consumer information to ensure that requirements are met.
- To support our work with our Industry Forum, we have commissioned research into what 'vulnerability' means to consumers and what is preventing them from accessing the support they require - and what is important to them.
- We also believe that consumer charters may help consumers to receive a better standard of customer service and are looking into this further. We will publish our insights in the coming year.



Policy areas of particular focus for us in the coming year:

Affordability and debt

We have highlighted above the need for communications services to be affordable to all, by right.

We have seen positive action from communications providers in preventing disconnections wherever possible and offering payment plans. However, through our network of Hubs we have heard that consumers have been having difficulty getting through to their provider, in general and specifically when trying to resolve payment difficulties.

We have urged communications providers to promote their debt and disconnection policies and to be proactive and approachable in terms of identifying and contacting consumers who may be struggling. By improving how they record and identify 'vulnerable' consumers, communications providers can ensure that its customers receive the required support and/or protections, now and in the future.

To help achieve the above, we believe that providers should advise consumers of any support available to them from the outset and throughout the customer journey so it's easier for consumers to ask for support. In addition, information provided to consumers should be easy to access and available in a variety of formats. We have also, through our Hubs, highlighted what is available to consumers, by inviting Ofcom's policy team to talk to stakeholders. In turn, we invited StepChange to talk to providers at our Industry Forum and to answer questions on the 'Breathing Space' initiative.

We remain alert to the plight of consumers who continue to experience 'data poverty' and - as we saw in our previous round of research, consumers putting communications service bills before food or utilities. We believe that the impact of the pandemic on UK

households' finances means that we cannot remove focus from protecting consumers in financial vulnerability in the year ahead.

Postal services

We have continued to work closely and share insights with Ofcom, the CCNI, Citizens Advice and others in the past year, and remain focused on ensuring that postal services operators regulated by Ofcom provide a reliable service and treat consumers and citizens fairly. In particular, we continue to be concerned about consumers' experiences of post to and from Northern Ireland and in the Highlands and Islands. We've also heard through our Hubs that postal redirection services remain unaffordable for many consumers, and this can be a particular issue for small businesses. We've previously engaged with Ofcom and industry on this issue during the initial stages of the Covid-19 pandemic and in discussions on the future of postal regulation, and we'll stay alert to the issue moving forward.

We will also seek to ensure that action is taken by the regulator if operators fail to meet delivery targets. We are committed to further understanding the needs of postal services users across the UK and ensuring that processes are in place to guarantee these needs are known, prioritised and met.

We published research in 2021 into the attitudes of consumers who use parcel services and shared the findings and other insights gained through our Hubs with Ofcom as part of its review of future postal regulation. We have welcomed strengthened proposals from Ofcom for parcel services users, particularly users who have additional access requirements.

In the interest of fairness, we believe that postal - including parcels - service users should receive a good quality, affordable service wherever they are in the UK.

Migration to VoIP

Migration is now taking place across the UK, without the benefit of a widescale communications campaign yet launched and without communications providers having full awareness of who among their subscriber base might be put at risk by migration.

Ofcom's rules state that providers must ensure that customers who rely on their landline have at least one hour's access to emergency services during a power cut. We have previously highlighted our belief that those rules do not go far enough to protect consumers, however, without an understanding of which of their customers have additional support requirements, these basic safety needs may go unaddressed. Additionally, the lack of a widescale, easily understood by all, communications campaign means that there is room for misinformation, scams and disconnection from vital services such as telecare.

We welcome news that a leading provider is developing a campaign but remain deeply concerned about the risk to those consumers who are in more vulnerable positions. We would urge that any communications campaign needs to be accessible and available in a variety of formats to ensure that the information is far-reaching and inclusive. We have supported the work by Ofcom, the Home Office, consumer bodies and others in tackling scams and will continue to contribute to this work.

We are further concerned about the perception that consumers, citizens and micro-businesses will be able to substitute their landline service with a mobile phone service in an emergency. Those living and working in rural and remote parts of the UK have advised us that this would not be a reliable contingency plan for them.

We welcome Ofcom and DCMS' plans to tackle mobile coverage, but would temper enthusiasm with caution to maintain as a partial contingency the 2G/3G network. Alongside people living and working in rural and remote locations, those at higher risk of harm without access to 2G and 3G networks would be people who have older or second-hand mobile handsets.

Digital privacy and ethics

As explained earlier in this report, we believe that all consumers who are able to go online should be able to do so safely and confidently. Our National Hubs participants have highlighted this as an issue for discussion at an upcoming Hub session.

Following on from our 2021 report 'Digital Connectivity in the Pandemic', which looked at the way consumers felt and acted when they had to do something new online during lockdown, we plan to revisit our Digital Footprints research (Digital Footprints: a Question of Trust, 2016) and see how differently consumers respond to the same questions of trust, protection and privacy, over five years on.



Summary

- We welcome regular engagement with consumer stakeholders, charities, policy-makers, communications providers and others, which enables us to listen ever more closely to the consumer voice and to feed it into policy and industry decisions;
- We hear from stakeholders and research participants that inclusivity, handling of vulnerability and contingency to build resilience to outages, are overarching current themes for consumers, citizens and micro-businesses;
- We want to continue to promote and protect the rights of consumers, citizens and micro-businesses in this sector, by strengthening our current priorities - encouraging universal access to communications services as a right for all, excellent service and customer service from the design stage throughout the consumer lifecycle and urging communications providers to better understand their customers' needs and use their own data to keep learning;
- We believe that the policy areas of affordability and debt, postal (and parcels) services, migration to VOIP and digital privacy/ethics are some that we should focus on in the year ahead, so that consumers, citizens and micro-businesses making their way out of the pandemic can use communications services to support their recovery. Communications services should reliably enhance lives, leaving consumers, citizens and micro-businesses free from risk of harm and unfair costs.