



**Communications
Consumer Panel**

and Advisory Committee for Older
and Disabled people



**Panel Defnyddwyr
Cyfathrebiadau**

Pwyllgor Cyngtori Pobl
Hŷn ac Anabl

Foreword: our strategic plan for 2023/24

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.

Context

The communications market is dynamic, fast-paced and continually evolving, so 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.

Each year, we review our strategic plan for the year ahead, taking into account what we have heard from our stakeholders during the year, what we know from our research findings, and any emerging issues in the communications sector, which covers fixed and mobile telecoms, broadband and alternative internet services, spectrum management, broadcasting and on-demand programme services and postal services.

We focus on the actions we can take within our own unique remit as a statutory consumer panel with a sectoral specialism. By ensuring we collaborate with consumer bodies with different remits, covering multiple sectors, but with mutual interests, we are able to scan the consumer landscape. This empowers us to identify and target challenges that may affect communications consumers in the present or near future, while maintaining awareness of broader, overarching issues that prevent consumer inclusivity, which we track against our strategic vision for the next three years. To ensure our thinking and language are current, we consult with our stakeholders before publishing our final plan.

One of our key aims is to highlight to Ofcom what it does not know about the consumer, citizen and micro-business experience, to help to make its policy-making inclusive.

Who are we?

The Communications Consumer Panel and Advisory Committee for Older and Disabled People (ACOD) are statutory bodies which exist to listen to and feed in the consumer voice to Ofcom, governments and the communications industry, with a unique remit to function as a 'critical friend' to Ofcom. All members have dual membership of the Communications Consumer Panel and ACOD and consider the needs and experiences of consumers overall, with a further consideration for any group of consumers that may experience barriers to an equality of outcome in the market. Some of those barriers include a lack of access, accessibility, usability, affordability and information. We also consider the needs and experiences of micro-businesses - businesses with up to ten employees, which rely on communications services to run their business successfully, without the resources of larger





Communications Consumer Panel

and Advisory Committee for Older
and Disabled people



Panel Defnyddwyr Cyfathrebiadau

Pwyllgor Cyngori Pobl
Hŷn ac Anabl

businesses.

Panel Members are Non-Executive Directors, appointed by the Secretary of State. They cover a wide-ranging matrix of skills, strengths, experience and stakeholder networks, enabling them to provide and deliver robust, timely policy interventions. A small Executive Team, resourced by Ofcom, provides operational support to Members.

Panel Members' biographies are on our website, here:

<https://www.communicationsconsumerpanel.org.uk/panel-members/panel-members>

How do we work?

The Panel's has a unique remit, as a 'critical friend' to Ofcom

- We collaborate with other consumer bodies, academics, industry, Ofcom and governments to ensure the consumer voice reaches communications policymakers and providers.
 - We facilitate a dynamic UK-wide network of National Consumer Stakeholder Hubs (National Hubs) and meet with them regularly to listen to the cutting edge issues faced by the consumers, citizens and micro-businesses they represent, when using the communications sector. We also hold individual meetings with stakeholders.
- We provide expert advice to industry, Ofcom and governments, in meetings, consultation responses and via our publications, informing the debate by commissioning robust independent research.
 - We facilitate a 'safe space' for the main industry players to discuss and debate non-competitive consumer issues, at our Industry Forum. We provide them with presentations from best practice customer service providers in other sectors, with a particular focus on fairness for consumers who have additional access requirements.
- We share insights with other consumer bodies, charities and not-for-profits to expand the public knowledge base on behalf of consumers, citizens and micro-businesses, extending the value of our research and insight programme.
 - We value highly our connections with other UK consumer bodies. Our Consumer Advocacy Hub is invaluable in ensuring that we do not duplicate, but complement each other's work.

Selecting our targeted, focal areas for the year ahead

The Panel's remit is broad. When reviewing our plans and looking at the particular value the Panel and ACOD can add in the year ahead, we ask ourselves the following questions:

1. What have we learned from our work programme?





Communications
Consumer Panel

and Advisory Committee for Older
and Disabled people



Panel Defnyddwyr
Cyfathrebiadau

Pwyllgor Cyngtori Pobl
Hŷn ac Anabl

2. What are the future challenges that we can help to address?
3. What don't we know?

Our focus on inclusivity

Many of the issues communications consumers are currently facing are a result of wider societal challenges e.g. a continuation from the pandemic and other global issues such as the war in Ukraine and the subsequent supply problems. While cost passed down through retail pricing and consolidation in the digital communications market have a very immediate impact on the consumers and citizens we represent, it is difficult for the industry to control many of the drivers in this area.

However, there are things that industry can control to make the communications sector fairer, and in particular, by making it more inclusive. We [published a think-piece written by Graeme K Whippy MBE](#) last year and, having contributed to the development of [Ofcom's Treating Vulnerable Customers Fairly guide](#), we continue to encourage Ofcom and industry to collaborate with consumer groups and charities to develop a more in-depth understanding of the consumer journey.

Only armed with this knowledge can we understand why the communications consumer experience is more difficult for some consumers than others and how consumer detriment can compound in the communications sector.

Consumers may experience barriers to inclusivity and equality of outcome for a number of reasons and one circumstance may lead to another. Examples of situations that prevent consumers from receiving equal and inclusive access to communications services include:

- While the cost-of-living crisis keeps a firm grip on the spending power of UK consumers and micro-businesses, there is an increasing gap between those who are able to afford and take advantage of the ever-increasing broadband speeds rolling out across the country and those who are struggling to pay their bills and are not aware of options such as social tariffs.
- A consumer on a low income may decide there is no option other than to stop paying for access to the internet, but that will prevent them from accessing deals that are only available online which may save them money.
- People in rural and remote areas may live in a location that doesn't feature in the mapping of fibre or in mobile coverage upgrade plans, leaving some people with poor or unreliable coverage. At the same time, these consumers may experience parcels surcharging, paying more than average to have parcels delivered, with no guarantee that the parcel will arrive on time.
- For citizens, consumers and micro-businesses, a lack of digital skills and confidence to engage online effectively and safely can mean that they may fall subject to fraudulent activity, which we know from previous research can prevent them from engaging further online.





Communications Consumer Panel

and Advisory Committee for Older
and Disabled people



Panel Defnyddwyr Cyfathrebiadau

Pwyllgor Cyngchori Pobl
Hŷn ac Anabl

- Consumers who have additional access requirements, such as accessible formats, alternative fonts or language, braille, subtitles, audio description, signing, video relay, or others to use telecoms and/or broadcasting services, still find provision of these services inconsistent, leaving them with unequal access to information, entertainment, education, employment opportunities and social connections.
- We have been disappointed to hear from stakeholders representing consumers and citizens with sensory loss that many of the same issues highlighted in our Access Services research continue.

We strongly encourage the communications sector to adopt an intersectional ‘social model of communications inclusivity’ recognising the matrix of detriment that consumers can experience. We have urged industry and policymakers to adopt the social model of disability and would encourage them to expand this enlightened approach to consider the challenges faced by consumers with financial difficulties, consumers in rural areas, citizens with low digital skills and other scenarios that can prevent consumers from receiving an inclusive service.





Our Strategic Priorities 2023/24

Our vision for the year ahead continues along the same themes as the current year, with a strong focus on inclusivity and equality in this sector, which we believe is built from a clear, enforceable right to access services in this sector; a strong culture of service and customer service, delivering to consistently high standards and listening regularly to consumers, co-designing services to meet their evolving needs.



A basic right to access to communications services

- 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.
- Consumers also need the skills and confidence to navigate the communications market, participate digitally and stay safe online.
- We believe that communications services should be a basic right for all UK citizens.





**Communications
Consumer Panel**

and Advisory Committee for Older
and Disabled people



**Panel Defnyddwyr
Cyfathrebiadau**

Pwyllgor Cyngchori Pobl
Hŷn ac Anabl



Excellent standards of service and of customer service

- We have further strengthened our view that excellent standards of service and customer service are vital for consumers, through the cost-of-living crisis and beyond.
- Communications services should integrate all consumers' needs and requirements from the outset. This means co-designing services with consumers and regularly checking the accessibility and usability of those services and of customer service and complaints processes. Consumers with a wide range of access requirements should have equality of access to offers and deals available both online and offline, and 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. Communications providers should build the assumption of a large minority of consumers having additional requirements into service design throughout, so that communications providers build flexibility and fairness into their culture.
- Our think piece, by Graeme K Whippy MBE, along with input from our Hub participants and our research, have supported our view that industry and policy-makers can and should do more to make the communications sector inclusive and an equally good experience for everyone. We look forward to further updates from Ofcom on the monitoring of actions taken by providers in line with Ofcom's Treating Vulnerable Customers Fairly guide.



Industry and policy-makers to listen actively to consumers' evolving requirements, to learn and adapt services and policies

- Our research and insight programme and our engagement with consumer stakeholders enable 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 how to adapt their services.
- 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.





**Communications
Consumer Panel**

and Advisory Committee for Older
and Disabled people



**Panel Defnyddwyr
Cyfathrebiadau**

Pwyllgor Cyngchori Pobl
Hŷn ac Anabl

- As stated above, we believe that all consumers 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 recording consumer requirements across the sector, so that consumers can switch provider easily.
- To support our work with our Industry Forum, we have commissioned research into what 'vulnerability' - a word commonly used across regulated sectors to label consumers with additional requirements - means to consumers and what is preventing them from accessing services they require,
- We look forward to publishing the above research and our independently-commissioned think piece on customer service across sectors, in the coming months.

Specific policy areas of particular focus for us in the coming year

We propose to continue to tackle the following ongoing, important policy issues, which we believe are the foundations of inclusivity and equality in the communications sector.



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. This is particularly disappointing given the prompt action we know this sector is capable of, since its swift interventions to keep consumers connected during the pandemic.

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. 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 to connect with communications providers.

We remain alert to the plight of consumers who continue to experience 'communications





Communications Consumer Panel

and Advisory Committee for Older
and Disabled people



Panel Defnyddwyr Cyfathrebiadau

Pwyllgor Cyngtori Pobl
Hŷn ac Anabl

poverty', particularly people with specific access requirements who are required to pay additional costs to have equivalent access to communications and - as we saw in our previous round of research, consumers putting communications service bills before food or utilities. We are also conscious of the impact of mid-contract price rises, on the average consumer's pocket as well as for those who are already struggling to pay their bills.

- We have commissioned research into the experiences of consumers who are on low incomes and qualify for social tariffs and look forward to sharing the findings in the coming months.
- We've also commissioned a piece of research looking into the purchasing decisions and experiences of young consumers entering the communications market for the first time.



Postal services

We have continued to work closely with Ofcom, the CCNI, Citizens Advice, Consumer Scotland 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 will also seek to ensure that the regulator takes action 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 remain concerned that the postal service retains its universality and fitness for purpose - including affordability. A vital part of this is the second-class safeguard cap and we will input into Ofcom's upcoming review of this.

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 service wherever they are in the UK.

- We have commissioned a piece of research looking at the individual and holistic experiences of consumers living in remote and rural communities - this includes not only access to decent digital connectivity, but also to postal services and broadcast programme services.





Communications
Consumer Panel

and Advisory Committee for Older
and Disabled people



Panel Defnyddwyr
Cyfathrebiadau

Pwyllgor Cyngchori Pobl
Hŷn ac Anabl



Wide-scale change in the communications sector: keeping consumers, citizens and micro-businesses informed in a timely and inclusive manner

Migration to Voice-over IP (VoIP) is now taking place across the UK, without a widescale communications campaign yet launched, many consumers unaware of how it may affect them and without communications providers having full awareness of who among their subscriber base might be left isolated and unprotected through a loss of service after 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 remain deeply concerned about the risk to those consumers who are unaware of the impact on VOIP services by outages such as power cuts. 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. To ensure consumers are supported and have the necessary protections in place, they need to be aware of and understand the possible impacts of migrating to VoIP and what protections and/or support options are available to them e.g. battery back-ups. It's important that this information is provided in a clear and accessible format that meets the requirements of consumers.

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.

We have been pleased to note that Ofcom and providers appear to have learnt from Migration to VOIP in the way that they are handling the switch-off of the 2G and 3G networks and hope that this listening and learning continues.

- We have commissioned a follow-up to our 2022 Migration to VOIP research to take stock.





Digital privacy and ethics

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.

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 revisited our Digital Footprints research ([Digital Footprints: a Question of Trust, 2016](#)) to see how differently consumers respond to the same questions of trust, protection and privacy, over six years on.

- We look forward to sharing the findings of our 2022 research on Digital Privacy and Ethics.

Summary of our proposals for 2023/24 and beyond

- We welcome regular collaboration with consumer stakeholders, charities, policy-makers, communications providers and others, which enables us to discuss developments across the communications landscape that could impact consumers, listen ever more closely to the consumer voice, identify areas where consumers are facing particular detriment and feed these insights into policy and industry decisions and the Panel’s work programme
- 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 access to communications services as a basic right, excellent service and customer service 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, widescale sectoral change such as 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 can navigate the communications sector safely and confidently. Communications services should reliably enhance lives, leaving consumers, citizens and micro-businesses free from risk of harm and unfair costs.
- We propose to set out our three-year vision for the years 2024-27 later this year. We welcome feedback from our stakeholders.

