

## Communications Consumer Panel and ACOD's response to Citizens Advice's draft workplan 2023/24

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### About us

The Communications Consumer Panel, established by the Communications Act 2003, is a group of independent experts with direct sectoral experience. We ensure the voice of UK consumers, citizens and micro-businesses is represented in communications policy development.

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

The Panel pays particular attention to the needs of older people and people with disabilities, the needs of people in rural areas and people on low incomes, and the needs of micro-businesses, which have many of the same problems as individual consumers.

Four members of the Panel also represent the interests of consumers in England, Northern Ireland, Scotland and Wales respectively. They liaise with the 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. Following the alignment of ACOD (the Advisory Committee for Older and Disabled people) with the Panel, the Panel is more alert than ever to the interests of older and disabled consumers and citizens.

### Our response - different remits, mutual aims

We welcome the opportunity to comment on Citizens Advice's draft workplan. We value regular collaboration with Citizens Advice as an active participant in our Consumer Advocacy Hub for the Communications sector (including postal services) and look forward to working closely with them in the year ahead.

Naturally, we share many of Citizens Advice's main aims and objectives, with our different remits enabling our complementary consumer advocacy functions to work harmoniously to provide a voice for consumers and users of this sector.

We align with Citizens Advice's thinking on its key four themes<sup>1</sup> and support their use of public campaigning to tackle market failures and promote fairness to all consumers, particularly those most likely to suffer harm or barriers to good value products and services. We have encouraged policymakers and industry to rely less on the term 'vulnerable' to describe consumers or the circumstances they face. We have found from

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<sup>1</sup> **Making markets work for consumers** - speaking out on behalf of consumers where there are market failures; **Better value infrastructure** - making sure investment is well managed to deliver value for money and good consumer outcomes; **A fair deal for consumers in vulnerable circumstances** - so that those most likely to suffer harm can access good value products and services; **Protecting consumers in rapidly evolving markets** - maximising the opportunities presented by innovation to change and improve the way markets serve consumers.

listening to participants at our National Stakeholder Hubs that some consumers find the term ‘vulnerable’ pejorative and when applied to their circumstances. We support them in urging policymakers and industry to seek to identify and remove barriers to equal and inclusive service. We welcome Citizens Advice’s focus on Equality, Diversity and Inclusion and look forward to meeting and working with their specialist EDI and policy officer who will lead their work on the three EDI commitments<sup>2</sup> described within the draft workplan.

### **Providing a voice for consumers experiencing multiple intersections of detriment**

We welcome any insights and evidence from the Citizens Advice’s Intersectionality dashboard. We regularly highlight to Ofcom and others the layers and intersections of detriment that can be faced by consumers in the UK communications sector, when experiencing market failures in more than one market, which prevents consumers from being able to make independent, informed decisions and from leaving unfair contracts.

In the coming year, we will be taking an in-depth look into the experiences of consumers in the UK’s remote and rural areas, with a qualitative study that we look forward to sharing with Citizens Advice and other Consumer Advocacy Hub participants as soon as we are able to.

### **Making postal services work for consumers and micro-businesses**

We share Citizens Advice’s concerns about protecting and strengthening the postal USO and holding Royal Mail to account for quality of service failures. We meet regularly with Ofcom and Royal Mail and believe that the consumer and micro-business voice should remain at the heart of decision-making around postal services, despite challenges facing the sustainability of the service. While numbers of letters may have declined, the importance to those who rely on them should not be underestimated and a universal accessible and affordable service must remain. We welcome Citizens Advice’s commitment to protecting this vital service and support further research in this area.

In terms of affordability, we strongly agree that the second class price cap must remain in place. We will continue to work with Citizens Advice, Ofcom’s post monitoring team, Royal Mail and others to ensure that second class post remains affordable to all, especially during this cost-of-living crisis and at a time where people who are digitally excluded risk further exclusion if incorrect assumptions are made about postal users’ needs and budgets. Consumers, citizens and micro-businesses should not have to make difficult decisions about their own budget in order to use the postal service.

### **Summary**

- We welcome continuing collaboration with Citizens Advice, ensuring that our research and insights programmes best serve consumers, citizens and micro-businesses, with no duplication. We have valued their participation in our

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<sup>2</sup> Integrating equality by design into every major advocacy project we undertake; Doing regular stock takes of our data to understand how our clients’ problems map against protected characteristics to identify any gaps in our advocacy work; Ensuring at least one of our policy changes each year has a positive impact on groups who experience intense disadvantage, detriment or harm



Consumer Advocacy Hub and Communications Consumer Hub for England as well as ad hoc meetings on topics of interest.

- Consumers' lives cross sectoral boundaries and we appreciate Citizens Advice's insights from other sectors which helps to inform consumer advocacy work in the communications sector.
- We support Citizens Advice's choice of themes and recognition of the intersectionality of consumer detriment. We welcome the introduction of an EDI specialist to Citizens Advice and look forward to working with them.
- We support Citizens Advice's continuing strength of voice on behalf of users of UK postal services and in protection of a postal service that is affordable and accessible, holding policymakers and industry to account for failure to deliver promised good quality service levels.