

Communications Consumer Panel and ACOD's response to Consumer Scotland's Draft Work Programme 2023/24

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 Scotland, England, Northern Ireland 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

We welcome Consumer Scotland's attention to the needs of Scottish consumers and support their focus on the key themes of tackling the cost of living; climate change, mitigation and adaptation; and a focus on consumers in vulnerable circumstances.

Consumer Scotland's remit is wide-reaching and we hope that our sector-specific expertise will enable both organisations to share insights that benefit as wide a range of consumers as possible, in Scotland and across the UK communications sector.

Migration from the PSTN (Public Switched Telephone Network) to VOIP (Voice Over Internet Protocol) network

We appreciate Consumer Scotland's allyship in working to ensure that consumers and citizens do not suffer when the PSTN network is switched over to VOIP. We are of the view that a nationwide communications campaign supported by the main industry players responsible for the switch-off is the best option for consumers and citizens.

[Our qualitative and quantitative research](#) from 2021 and 2022 has indicated that more needs to be done to ensure that consumers, citizens, micro-businesses and businesses that supply services to consumers and citizens using the PSTN network need more information

in order to prepare fully.

Linked to this, we share concerns with Consumer Scotland around the switch-off of 2G and 3G services, upon which many consumers rely. We believe that it would be an easy assumption for communications providers to make that consumers have a mobile phone that would work if their landline service was affected by a power cut after migration to VOIP. However, this would be a flawed view and disruption, outage or retirement of these services would affect consumers who rely on them - including those in remote and rural areas, such as the Scottish Highlands and Islands - disproportionately. We believe consumers' needs must be fully accounted for during industry-led changes and consumers should not be left to face the unintended consequences of a loss of service during an emergency, or additional costs during a cost-of-living crisis.

We look forward to continuing to work with Consumer Scotland and other consumer advocacy and advisory bodies across the UK to promote the consumer voice and encourage providers to do what is right when widescale industry-led changes impact consumers. We will commission further research to support our mutual interest in this area, working closely with Consumer Scotland and others to avoid duplication.

The priorities and needs of consumers in vulnerable circumstances

We welcome Consumer Scotland's attention to the needs and priorities of consumers who are less well-served or who experience barriers to an equal, inclusive service.

We believe that consumers are made vulnerable when they encounter these barriers and we frequently highlight to policymakers and industry the intersectionality of consumer detriment that exists. Consumers are holders of multiple identities and some consumers can effectively be restricted from benefitting from multiple services that others take for granted, for reasons such as having accessibility requirements, being old or young, speaking English as a second language, living in a remote or rural area, having no fixed address, being on a low income, being digitally less confident and other reasons.

With communications services proving to be ever more essential services that consumers rely on in their daily lives, we believe that all consumers should have an equal right to access these services, which should be co-designed with consumers from the outset.

As you know, we find the meetings of our [Consumer Stakeholder Hub for Scotland](#) invaluable. The meetings, chaired by our Member for Scotland, Amanda Britain, enable to us to listen to a range of consumers' experiences from cross-sector organisations, on a topic where we can influence change, such as affordability in the communications sector. We share summary notes of the meetings with policymakers and industry to ensure that the consumer voice is fed into their work on an ongoing basis. We have also taken deeper dives into issues facing a sub-group of consumers, such as the needs and priorities of people with sensory loss, where we have highly valued regular input from The Alliance's Sensory Support Hub and formerly Deaf Scotland.

We look forward to hearing more about Consumer Scotland's Short Life Working Group (SLWG), drawing on cross-sector expertise and insight to help develop your approach to

hearing the consumer experience. We would welcome an update to our Consumer Stakeholder Hub or Panel meeting if and when appropriate.

Post

Our [research](#) has previously focused on the issues faced by postal service users across the UK, including those in remote and rural locations in Scotland. We looked at three groups: people living in remote and rural areas; people with accessibility requirements and micro-business owners (with some cross-over across two or more categories). As a follow-up we commissioned a small scale focus group on postal services experience in the wide-reaching IV postcode area. Both studies were not surprising, having listened to consumer stakeholders in Scotland and Ofcom Scotland but alarming in the impact experienced by individual consumers and micro-businesses, which underpin the UK's economy.

We support Consumer Scotland's further consideration in this policy area. A universal service with affordability and service quality at the heart must remain available to Scottish consumers, as to all UK consumers, with transparency of parcel delivery pricing and options that enable Scottish consumers to afford to send and receive parcels and letters and to expect reliability.

As highlighted earlier in this response, consumers may experience multiple intersectional layers of detriment and to look into this in more detail, we have commissioned a qualitative study looking in depth into the experiences of consumers living in remote or rural parts of the UK, using communications services. We appreciate Consumer Scotland's input in terms of remote and rural locations in Scotland.

Summary

We believe that Scotland's consumers (including micro-businesses and citizens) and all UK consumers, deserve as many 'touch-points' as possible across the consumer landscape.

We welcome as many evidence-based, consumer-focused organisations as possible voicing the needs and priorities of consumers to provide an equity of empowerment for consumers with profit-making organisations. This is particularly needed to support consumers in the complex, converged and consolidated market of digital communications services and in ensuring reliable postal services remain universally available and affordable.

We appreciate Consumer Scotland's swift and robust initiation into the UK consumer advocacy landscape and would continue to share thoughts and actions on mutual interests and complementary remits, to support Consumer Scotland in promoting the rights of Scottish consumers in the sector where we have influence.