# CAS Response to CCP Strategic Plan for 2022/23

Scotland’s Citizens Advice Network is an essential community service that empowers people through our local bureaux and national services by providing free, confidential, and independent advice. We use people’s real-life experiences to influence policy and drive positive change. We are on the side of people in Scotland who need help, and we change lives for the better. We welcome the opportunity to respond to this consultation.

Citizens Advice Scotland (CAS) values the collaborative working relationship that exists between stakeholder organisations such as ourselves and the Communications Consumer Panel (CCP). Consumers have benefitted from our joint efforts to shine a light on issues of consumer detriment in communication services and advocate for actionable solutions. We support continuing engagement to identify areas of shared interest and to advance consumer protection. Communication services, both postal and digital, are an important part of keeping our communities and workplaces connected and it is essential that citizens have equal access to services. We know from our network of 59 Citizens Advice Bureaux across Scotland that clients have been reliant on communication services, both digital and postal, throughout the pandemic.

CAS supports the themes of inclusivity, vulnerability, and resilience that inform the CCP’s strategic priorities. Our own consumer advocacy work is informed by the seven Consumer Principles of access, choice, safety, information, fairness, representation, and redress. We consider that the CPP’s strategic priorities and the Consumer Principles are sympathetic frameworks which allow us to consider issues affecting consumers and small businesses accessing communication services.

**Affordability and debt**

CAS is encouraged to see that the CPP is prioritising affordability and debt as a policy area of particular focus. We know that rising prices across the UK, including in energy markets are creating substantial pressures on household incomes. Affordability is a key concern for our work on digital and postal services. We continue to advocate that Universal Service Obligation (USO) postal services are affordable for all consumers.

For digital services, CAS would welcome efforts to increase awareness of targeted or social tariffs to increase accessibility and affordability of services for consumers. Considering the impacts of inflation, CAS believes that affordable communication services are particularly vital now, especially for more vulnerable consumers. We agree that in the next year it will be important to remain focused on protecting financially vulnerable consumers accessing communication services. We agree with the Panel that more can be done to ensure that all consumers can access these services and we believe that communications providers should work to ensure that the way they communicate reflects customer needs. We further agree that providers should seek to actively interrogate their complaints data and to learn lessons from this.

**Postal Services**

CAS supports the CCP’s focus on ensuring that consumers across the whole of the UK can access high quality, reliable and affordable postal services.

We are supportive of the CCP’s focus on the impacts of surcharging costs for consumers in Northern Ireland and the Scottish Highlands. We believe that there is also a need for further monitoring in relation to the affordability of redirection services, along with considering how affordable redirections are for our small and micro business communities.

CAS is also concerned about consumers impacted by sustained postal delivery delays. As we enter the second year of Royal Mail falling short of the Quality of Service targets required by the USO, we believe that additional steps must be taken to ensure consumers are receiving the services set out in the USO. CAS has welcomed Ofcom’s proposals to improve the parcel market for consumers by issuing new guidance on complaint processes and by requiring all operators to publish and comply with policies to meet the needs of disabled consumers. However, we consider that these changes will require rigorous monitoring together with the possibility of enforcement action to have the effect of raising standards and improving services.

**Migration to VOIP**

CAS shares the view that VOIP technology can have significant benefits for consumers. However, we also recognise the need for consumers to be protected from detriment during the migration. CAS shares the CCP’s concerns that some consumers may be exposed to harm if their existing homecare and other products are incompatible with VOIP or in the event of long-lasting power outages. We agree that consumers must be supported, and provided with accessible information, during and after the transition and this is especially true for Scottish consumers living in remote and rural areas who may be unable to access reliable alternative communication methods. We also believe that there is a need to learn lessons from recent weather-related power outages and to ensure that these lessons are adequately applied to the VOIP migration process.

**Digital privacy and ethics**

CAS agrees that all consumers should be able to go online safely and confidently and that consumers could benefit from further work on digital privacy and ethics. CAS looks forward to seeing how this work progresses and engaging where appropriate.