



Communications Consumer Panel and ACOD response to Citizens Advice's review of the consumer codes

Introduction

The Communications Consumer Panel (the Panel) and the Advisory Committee on Older and Disabled People (ACOD) welcome this opportunity to respond to Citizens Advice's invitation to stakeholders to give views on its review of the consumer codes.

The Panel works to protect and promote people's interests in the communications sector. We are an independent body set up under the Communications Act 2003. The Panel carries out research, provides advice and encourages Ofcom, governments, the EU, industry and others to look at issues through the eyes of consumers, citizens and microbusinesses.

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. Through its Members, the Panel represents the interests of consumers in Scotland, Wales, Northern Ireland and England. Following the alignment of ACOD with the Panel, the Panel is more alert than ever to the interests of older and disabled consumers and citizens.

Response

General Comments

The Panel welcomes this review of the consumer codes used by Citizens Advice. As highlighted in the consultation document, the consumer landscape has changed and, in order to be fit for purpose, it is important that the consumer codes used reflect this.

We particularly welcome the introduction of a new categorisation of Communications and Technology as well as the reappraisal of the codes used for post issues. We agree that the ability to assign multiple codes makes good sense and more closely reflects the nature of products and the complexity of consumers' lives.

A revised set of codes - renewed and updated regularly - is to be welcomed, but we would like to highlight that the codes in themselves are just tools; the way in which they are applied and analysed is where value and insight is obtained.

We strongly urge that the evaluation of the codes will not simply examine whether they are still in use, but will also look at the way in which they are being applied. In other words, a lack of use of a particular code may relate to staff awareness and training as much as whether it remains relevant to people's lives. We would therefore encourage thorough training for staff and a consistent application of the new codes.

We understand that the codes used within Citizens Advice Bureaux are out of scope of this consultation. We are concerned that this may diminish the overall value and use that can be made of the codes and the data collectively. The Panel would strongly urge consistent use of complaint coding, including across all the individual Bureaux. To have two sets of codes risks creating inconsistent data and detracts from the potential value of the resource for both Citizens Advice itself and for other stakeholders.

Code Classifications

The Panel has reviewed this consultation from the perspective of consumer and citizen interests in the communications industry. Our response therefore focuses on those sections relevant to Communications, Mail and Broadcast (Sections H- J)

- In relation to Sections H- J, the Panel would encourage Citizens Advice to liaise closely with Ofcom on how the regulator classifies complaints it receives in these areas. This would ensure that the Citizens Advice consumer codes are complementary and comparable with data being collated by other key organisations in the communications sector.
- In relation to Section H (Broadcasting) the Panel would suggest that more and better information may be obtained if the current codes are expanded. For example, 'HA01 Content of broadcasts' could be further broken down into matters relating to portrayal, swearing, sexual content, etc.
- On reviewing Section I, the characterisation by service is fairly broad when compared to the breakdown of services and problems listed under Mail (Section J). An alternative format might be to have a different structure for the top level categories, such as, but not limited to;
 - Billing
 - Sales
 - Repair
 - Quality of service
 - Debt/ disconnection
 - Customer service
 - Complaint handling

Each of the codes identified within the consultation document could then be captured under these new top level categories. It would therefore be possible to identify, for example, the total number of billing complaints in communications services as well as having a breakdown by fixed line, mobile, broadband, etc.

- The Panel notes that under the current proposed coding, there is no accommodation for particular issues that may impact more vulnerable consumers. For example, services such as text and video relay services, free directory enquiries, priority fault repair, third party bill management, accessible bills, emergency SMS, television access services and Electronic Programme Guides, and text phones.
- The Panel notes that there are currently no codes suggested for complaints in relation to switching communications suppliers or nuisance calls under IB - Ancillary Communication Services. We would urge that this be considered with a view to ensuring that these important consumer issues are properly captured.
- In relation to the categories listed under IC - Digital/ Media Content and Gaming, the Panel wonders if the headings may be too broad. For example, the 'social media' code could include a number of issues which, due to the generality of the overall coding, might be of limited value for further analysis.
- The Panel would recommend including email as an additional code under IC.

Summary

- The Panel welcomes this review of the consumer codes particularly the introduction of a new categorisation of Communications and Technology.
- The Panel strongly urges consistent use of complaint coding, including across all the individual Bureaux. To have two sets of codes risks creating inconsistent data.
- In relation to Sections H- J, the Panel would encourage Citizens Advice to liaise closely with Ofcom on how the regulator classifies complaints it receives in these areas.
- The Panel would recommend Citizens Advice review, and possibly expand, the codes under sections H (broadcasting), I (Communications and Technology) and IC (digital/ media content and gaming). As suggested above, liaison with Ofcom would ensure codes were complimentary and comparable.
- The Panel would ask that Citizens Advice consider how to incorporate particular issues that may impact more vulnerable consumers.
- The Panel would urge the inclusion of codes relating to switching communications providers and nuisance calls under IB (ancillary services) as these are also important consumer issues.