



Communications Consumer Panel and ACOD's response to 'Digital comparison tools for telephone, broadband and pay-TV: Proposed changes to Ofcom's voluntary accreditation scheme'

The Communications Consumer Panel, established by the Communications Act 2003, is a group of independent experts with direct sectoral experience. We ensure the citizen and consumer voice 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, the EU, 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.

Response

We welcome the opportunity to provide a formal response to Ofcom's consultation, having discussed our views with the team during the policy option development phase.

In a fast-paced sector, with a vast number of tariff choices and complexity in services and contracts on offer, it is vital that consumers are able to access information from an independent broker on the options available to - and suitable for - them, their budget and their needs. These services should be accessible to all, so that no consumer who wants to is unable to use these services. A summary of our views on Ofcom's proposals is below:

- We support the changes to the pillars of the accreditation scheme, particularly improvements relating to the accessibility of digital comparison tools and retention of the requirement that consumers are able to use tools offline, by contacting the comparison tool provider by telephone. The improvements will make the process of using those digital comparison tools that Ofcom accredits fairer and will empower consumers to understand where comparison information comes from and any selection involved in the process, so that they can make an informed decision.



- We are pleased that Ofcom took into account the Panel's views on making digital comparison tools more accessible and fairer to all, including using clear and plain language. Digital comparison tools should set the standard in terms of giving consumers information on tariffs across many providers, in a clear and jargon-free way, so that once they take up a contract with a communications provider, they are in a good position to engage with their provider over their needs and any problems.
- We note that Ofcom proposes to amend the auditing process within the accreditation scheme. We strongly urge Ofcom that if it is to be conducted in-house, rather than outsourced to an external provider, that Ofcom make this process as transparent as possible, so that consumers can be assured that the necessary level of rigorous monitoring and follow-up action is taking place. We also recommend that Ofcom seeks input from consumers on their use of digital comparison tools, in order to provide evidence of what works and what doesn't to those providing these services.
- We have also urged Ofcom to consider ways to make the voluntary accreditation scheme more attractive to the larger digital comparison tools, providing a 'charter mark' that will enable consumers to evaluate how effective and fair all digital comparison tools are, across the board.