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Ofcom
Riverside House
2a Southwark Bridge Road
London SE1 9HA

20 May 2022

By email only

Dear [<],

Consultation: Treating vulnerable customers fairly guide – proposals to amend the guide to help ensure customers in debt or struggling to pay are treated fairly

We are grateful for the opportunity to provide comments on Ofcom’s consultation on proposed amendments to the guide to help ensure customers in debt or struggling to pay are treated fairly. We are supportive of Ofcom’s timely review and its aim to ensure customers who fall into debt or are struggling to pay are treated fairly.

The flexibility of guidance in this area allows providers to engage with customers who are struggling to pay, based on the customers individual circumstances. It avoids a one-size-fits-all approach and allows providers to meet the aims of the guidance in a way that is appropriate for their customers. We are pleased to say that we already do most of the measures proposed in Ofcom’s guidance. However, there are a few areas where we take a slightly different approach. Whilst we rotate between communication channels when contacting a customer about their debt, we don’t always know what the customers preferred communication method is, we instead communicate via SMS first, followed by either email or outbound call and then we send a letter. For security verification purposes, we require a representative from a debt advice organisation to be in the same room as the customer when representing their clients. Additionally, we have worked with the Money and Pensions Service and we can now directly refer customers to the Debt Charities on EE if they require financial support (rather than the customer having to initiate the contact themselves), [<].

We welcome Ofcom withdrawing its initial proposal that providers should avoid disconnecting customers before 3 months, recognising the risks we (and others across industry) raised. Disconnection is an important tool to incentivise payment and to encourage customers to engage with their providers. It also allows providers to restrict the debt exposure a customer has, where we believe there is a high risk they cannot pay.

In our response to Ofcom's Call for Inputs, we highlighted that Ofcom should not be too prescriptive in the level of detail providers are required to publish on their websites about the types of payment plans available. Ofcom's amended guidance strikes the right balance. We already emphasise on our website the support available to customers in debt and direct customers to get in touch if they are having trouble paying their bills.¹ In EE we also include information on where customers can access free debt advice on customer bills, [X].

We have provided a broadband social tariff for many years and launched our new broadband social tariff, BT Home Essentials in June 2021. We are the only provider who offers sign up via all channels and we tell eligible customers about our social tariff if they fall into collections, in line with Ofcom's proposed guidance.

Alongside these amendments to the guide, we believe Ofcom should be encouraging providers who have not yet launched social tariffs to launch them, and if they have already launched them, to ensure they are meaningful for customers. This is particularly important in the context of the rising cost of living.

We look forward to Ofcom's final statement on this issue.

Yours sincerely

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¹ <https://ee.co.uk/help/help-new/billing-usage-and-top-up/paying-my-bill/what-should-i-do-if-i-cant-pay-my-bill; Can't pay or need more time to pay your bill? | BT Help>