



We are includem

Response to Ofcom's call for Input

Our mission: To provide the support young people need to make positive changes in their lives, and inspire a more hopeful future for young people, their families and communities.

Our vision: A world where every young person is respected, valued, and has the opportunity to actively participate in all aspects of life and society.

We work closely with children, young people, and their families, who are facing difficult challenges in their lives. Our trust-based, inclusive model of support is centred on the needs of each young person. We help young people make positive life choices and empower them to transform their lives; creating better outcomes for young people and their communities

The coronavirus pandemic and the mitigations introduced to limit its spread have had a profound effect on all of us. However, it is already painfully clear that the social and economic fallout from this crisis is going to hit hardest those who were already marginalised and struggling. Most of the young people and families we support are living in the most deprived areas of Scotland and experiencing poverty.

Families includem surveyed for our Staying Connected: Assessing digital inclusion during the coronavirus pandemic (May 2020)¹ found that:

- **20% of those surveyed did not have access to all the devices that they need** – even for families that did have access to devices, they told us they were often shared with parents or siblings, or they did not have the confidence or knowledge to use them.
- **33% of the young people and families surveyed did not feel they would be able to afford ongoing costs** – families reported struggling to cover costs of internet access and replacing damaged devices.
- **16% of those surveyed access the internet via their mobile data** – some families told us they simply could not afford a Wi-Fi connection and accessed the internet via mobile data packages as and when they could afford them.
- **11% do not have devices with video call functionality, with 1 in 4 saying using video calling would put pressure on their data allowances** – while video calling has been widely adopted by many support services, young people and families told us they were either unable to access this function or

¹ <https://includem.org/wp-content/uploads/2021/01/Staying-Connected-Assessing-digital-inclusion.pdf>



were concerned about the impact video calls would have on their data allowance which in turn limits their participation.

Our poverty research (October 2020)² explored the degree of deprivation experienced by the families we support further. Given the findings outlined in your call for input we think it is important to outline the four main findings of this research as it will demonstrate the extent of deprivation beyond digital exclusion.

- 60% of the families we support who receive social security struggle to put food on the table on a regular basis.
- 47% of the families we support have regular issues affording the internet.
- Over 50% of families we support have regular issues paying for heating.
- 1/3 of the families we support have regular issues paying rent.

In order to support young people and families throughout the pandemic, includem has ensured £140,000 is given directly to the children, young people, and families we support through our Young Person's fund, the Wellbeing fund, and the Barclays 100x100 fund – including over **£21,000** to assist with digital access and connectivity.

In our response to the Scottish Government's digital strategy³, we outlined the need for a holistic package of digital support that factored in not just access to devices but tackling poverty to ensure families have the means to stay connected (e.g. enough money for electricity bills, broadband and mobile data costs), digital skills so that families are confident and safe online, and support when devices reach the end of their 'lifespan', particularly if they have moved on from the organisation that was initially providing them with support.

Making sure customers, especially people in vulnerable circumstances, are treated fairly is a priority for Ofcom⁴ - and at includem we are committed to ensuring that the young people and families we support are treated fairly by providers.

Includem believes that digital access should fundamentally be viewed through a rights-based lens. In responding to this consultation, we seek to emphasise the need for communications providers to provide flexible payments options for those who face issues with debt – including those who may already have been 'frozen out' or

² <https://includem.org/wp-content/uploads/2021/01/Poverty-and-the-Impact-of-Coronavirus-on-Young-People-and-Families.pdf>

³ <https://includem.org/wp-content/uploads/2021/01/Digital-Strategy-Consultation.pdf>

⁴ https://www.ofcom.org.uk/_data/assets/pdf_file/0012/222321/review-of-measures-to-protect-people-debt-or-risk-of-disconnection.pdf



'blacklisted' due to issues with non-payments. Below, we have provided a case study which demonstrated the particular struggle of one family:

Supporting families who may have been blacklisted

*Names anonymised to protect identity

Includem supports many families who are being excluded from digital connectivity due to historical issues. The Taylor* family are just one of the examples of family we have worked with to solve this important issue.

The Taylor family are currently on a pay as you go tariff with very limited data for the family to share. They have tried again and again to move on to a pay monthly tariff that is affordable and gives the family what they are looking for – unlimited data to connect to the digital world but as a result of historical debt are not eligible for most contracts.

As part of our support and to combat digital poverty, includem offered to pay up front on the family's behalf, calling various telecommunications companies, however this offer was rejected on the grounds that the companies didn't often receive requests like this and didn't have a system to process a third party paying on their behalf.

As a result of this, the family continues to be on a pay as you go tariff, digitally disconnected due to their credit rating history with no support from the telecommunications providers or the incentive to help support them.

The Taylor story is just one of the many examples includem face on a daily basis where the process of paying up front for the families they support would be a welcomed option to tackle digital poverty.

For many of the families includem support this is a common experience, with **16% of families relying on Pay As You Go mobile contracts** to access the internet, with varying amounts of data. Many of the families were eligible for some of the free or discounted rates that were available during the pandemic but did not access them due to stigma, particularly where they needed to be referred by the school. For them this would have meant identifying the extent of their poverty and they were just not willing to do that for fear of the repercussions, after all children are 10 times more likely to come into care or be placed on the Child Protection Register when they are experiencing poverty⁵. It is important to also emphasise that for the families includem supports, digital debt is not their only debt, with many having to choose between heating their home and food on the table.

While we recognise that the measures offered by digital and mobile providers are very reasonable, they appear insurmountable for those experiencing destitution. We also know that signposting to debt advice organisation does not work for the families we support, they need a trusting relationship to broker in these services due to the stigma associated with debt and poverty.

⁵ <https://www.communitycare.co.uk/2017/02/28/children-poorest-areas-likely-enter-care-finds-study/>



Includem welcome Ofcom's analysis and identification of steps may be necessary and proportionate to ensure the protections for customers in debt or struggling to pay remain appropriate. In addition to these steps, we would encourage Ofcom and providers to consider ways in which data and digital can be made available to vulnerable customers in more flexible ways. **It should not be that those with the least means need to pay the most for access**, such as what happens for those accessing data through Pay As You Go mobile contracts.

Includem would ask for consideration of:

- **Development of systems or processes that would allow families to purchase home broadband on a Pay As You Go basis** which would allow them to plan to times of decreased and increased data usage such as around exam period or school holidays.
- **Development of systems or processes that allow set data usage on home broadband packages with a rollover of unused data**, similar to those available on monthly phone contracts. This again allows vulnerable families to plan and manage their data usage within their financial means.
- **More flexible payment options**, including developing systems that allow third parties to pay in advance for home broadband packages without continuing contracts.
- **Respecting families' right to privacy** by allowing them access to cheaper packages/contracts without the need for third party referral, such as schools.