

Emailed to: [debt.review@ofcom.org.uk](mailto:debt.review@ofcom.org.uk)

30 September 2021

Dear Sir/Madam,

**Ofcom: Call for Inputs: Review of measures to protect people in debt or at risk of disconnection**

I write in response to the Ofcom Call for Inputs: Review of measures to protect people in debt or at risk of disconnection.

**Answer to specific questions:**

**Q1. Do you agree that we should amend the guide in the ways suggested? If not, are there any alternative options you think we should consider? Please provide evidence supporting your views, including any research you have conducted or have access to**

We support the amendments to the guide and agree that providers should continue to work on how they identify and support vulnerable consumers in practice and emphasis the support available when directly communicating with a consumer in debt or struggling to pay.

We also agree that rotating communication methods may be useful but ensuring a consumer's preferred method is first taken into account. It is also worth considering how different communication channels may overlap, for example, if a consumer's preferred method is to write and receive written communication through post, interim telephone calls by the provider may have no impact and therefore not an effective way to communicate with that consumer.. It's also important to consider how frequently a consumer is contacted as well as taking into account whether a consumer is unable to pay or unwilling to pay potentially because they disagree with the amount requested.

**Q2. Do you agree that we should amend the guide in the ways suggested? If not, are there any alternative options you think we should consider? Please provide evidence supporting your views, including any research you have conducted or have access to.**

We think the amendments make sense - recommending providers should routinely include clear and prominent information about sources of free debt advice in their payment and collection communications would be useful. We also agree with increasing the prominence of the recommendation in the guide that providers consider offering consumer organisations a direct way to contact them on a consumer's behalf rather than via general customer service channels.

**Q3. Do you agree that there should be more consistency in the way in which providers seek to effect payment from customers in debt? If so, how do you believe this could be achieved most effectively? Please provide evidence supporting your views, including any research you have conducted or have access to.**



We agree that providers should consider freezing additional charges and fees when a consumer is experiencing problem debt. We think that the suggestions listed in paragraph 4.49 seem sensible such as not disconnecting a consumer before a minimum of three months after missing a bill payment. A phased approach in service restrictions to effect payment rather than a complete suspension - and avoiding using service restrictions for those consumers who are vulnerable who are particularly reliant on their services, both make sense. We also think that even with service restrictions, it is right for access to free helplines to be protected and then to ensure there is awareness of the fact that even when a consumer's phone may not be able to make other calls that they are able to access free helplines or emergency numbers. Likewise we think it's important to consider individual circumstances before putting a consumer in a position where they are pursued by a debt collection agency.

We haven't seen evidence of significant harm from service restrictions and disconnections and on the whole, providers have been looking to embed the fairness commitments into their practices, but we agree it makes sense to continue to monitor how service restrictions and disconnections are used.

We also agree it would make sense to amend the General Conditions to ensure providers take a more consistent approach to publishing information about the measures they take to effect payment and where this information is available which may include on websites and apps, where providers interact with their consumers.

**Q4. Do you agree that we should amend the guide regarding the provision of information about measures to support customers? If not, are there any alternative options you think we should consider? Please provide evidence supporting your views, including any research you have conducted or have access to**

We agree with the idea of adding a recommendation to the guide that providers give consumers information about the support available to them, such as whether there are options for payment deferrals or to set up payment plans. We also think it would make sense to put this on outgoing debt communications, on websites or ensure it is communicated through customer service teams. We know that this may be different depending on the provider and the systems and processes they have in place.

Please do not hesitate to contact us if you would like further information regarding our response. Our response is not confidential.

Your sincerely,



Ed Dodman  
Director of Regulatory Affairs

**For more information regarding this consultation please contact:**

David Pilling  
Head of Policy and Public Affairs  
Ombudsman Services  
3300 Daresbury Park  
Daresbury  
Warrington  
WA4 4HS