

Your response

Question	Your response
<p>Question 1: 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</p>	<p>Confidential? – N</p> <p>TalkTalk is continuously seeking to improve how we best identify customers who may be vulnerable.</p> <p>Financial vulnerability is particularly difficult to identify and manage as it potentially covers a range of different scenarios where customers may experience difficulties to pay on a temporary or more permanent basis. We would argue that the best way to address the needs of financially vulnerable customers is to have robust and clear processes that make sure that all customers are treated in a fair and transparent manner and where available payment support options are flagged to customers as early as possible.</p> <p>It is important that Ofcom’s guidance sets a realistic but clear expectation on the customer that they too have a key responsibility to engage with their provider to be able to avail themselves of the payment support and assistance on offer.</p>
<p>Question 2: 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.</p>	<p>Confidential? – N</p> <p>We agree that it is important that providers give customers clear and prominent information about sources of free debt advice in their payment and collection related communications to customers in arrears.</p> <p>TalkTalk works closely with a range of external organisations that can provide free and independent debt advice to customers.</p> <p>We also note Ofcom’s suggestion that providers should consider offering consumer organisations a direct way to</p>

	<p>contact them on the customer’s behalf rather than via general customer service contact channels. TalkTalk is happy to consider any such avenues, but all parties need also to address the potential challenges in this area in terms of accurate customer validation and the need for consistent customer messaging and experience.</p>
<p>Question 3: 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</p>	<p>Confidential? – N</p> <p>We welcome the outcome of Ofcom’s analysis that the evidence does not suggest there is any significant consumer harm arising from current industry practices around debt collection measures (including disconnection). It is important to emphasise that, as mentioned above, providers do require consistent customer engagement in order to be able to offer the best possible support and advice when the customer is liable to enter debt collection.</p> <p>We believe that providers generally do offer a sufficient level of information about their debt collection procedures and that there is therefore no need to consider amending General Condition C3.12. Providers need to be able to balance the specific information that they offer individual customers who are struggling with debt and the more general debt collection information published on their website.</p>
<p>Question 4: 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.</p>	<p>Confidential? – N</p> <p>We provide reasonably detailed guidance to customers about the specific support that we offer when they may be struggling to pay their bill. We are continuously looking to improve our processes in this regard and we are therefore happy to consider any further guidance based on industry best practice.</p>