



Vodafone response to Ofcom consultation:

**“Treating vulnerable
customers fairly guide”**



Introduction

Vodafone welcomes Ofcom's amendments to the best practice guide "*Treating vulnerable customers fairly*". The impact of the pandemic and cost of living crisis has highlighted the threat of digital exclusion faced by the most vulnerable in society. Vodafone recognises digital connectivity as an essential part of everyday life, and its importance in providing access to work, education, healthcare, finances and allowing users to keep in touch with family and friends.

This is reflected in Vodafone's everyone connected campaign which aims to provide connectivity and support to one million people.

Tackling digital exclusion is at the heart of our business and we welcome Ofcom's best practice guidance as supporting these objectives and ensuring that customers in debt or struggling to pay are treated fairly.

Answer to question

1. Do you agree with the proposed revisions to our guide? Please provide your views with supporting evidence.

The revisions Ofcom proposes to make to its guide, rather than seeking to introduce additional regulation through the General Conditions of Entitlement, are a proportionate and appropriate way to satisfy its stated objective of ensuring that vulnerable customers are treated fairly.

Ofcom's amendments focus on four areas:

- identification, engagement and communication with customers in debt or struggling to pay;
- strengthening links with organisations and charities that can provide free debt advice and support;
- measures taken by providers to effect payment; and
- measures designed by providers to support customers who are in debt or struggling to pay.

These proposals are complementary to Vodafone's approach to customers who may be in debt or struggling to pay. They reflect our own processes to transparently support customers who engage with us and to only apply service restrictions in a phased manner to effect payment.

Ofcom has additionally highlighted the role social tariffs can play in enabling households on low incomes to access affordable communications service. Whilst Vodafone welcomes this addition, Ofcom should not



focus solely on social tariffs. Vodafone's Home Broadband pricing is consistently amongst some of the lowest cost services in the market and offers everyone low prices below the level Ofcom considers to be a social tariff.

Similarly Vodafone's Voxi For Now is a unique proposition in the market, offering endless 5G data, calls and texts for £10 a month with no contract for those receiving financial support. 20% of consumers in this cohort rely on mobile for their internet access and Voxi For Now is a unique offering in this market.

To ensure sustainable long-term products in the market Ofcom can reinforce retail-level best practice guidance with clear practical steps that Ofcom can take at a wholesale-level. Securing the provision of a discounted wholesale broadband offer for social tariffs from Openreach or through advocacy removing VAT from social broadband offers will allow the widespread sustainable provision of social tariffs across the market.

Vodafone UK

May 2022