

# Citizens Advice Scotland response to Ofcom's consultation: Mobile roaming: Strengthening customer protections

## Proposals for new rules and guidance

### Background

Citizens Advice Scotland (CAS), our 59-member Citizen Advice Bureaux (CAB) and the Extra Help Unit form Scotland's largest independent advice network. Scotland's Citizens Advice Network is an essential community service that empowers people in every corner of Scotland through our local bureaux and national services by providing free, confidential, and independent advice. We use people's real-life experiences to influence policy and drive positive change. We are on the side of people in Scotland who need help, and we change lives for the better.

### Introduction

CAS welcomes and fully agrees with Ofcom's view that consumers who are confident and able to engage in the market to get the right services for their needs are vital to a well-functioning market. CAS believes that when consumers are equipped and empowered to make informed decisions about mobile services it is of benefit to both consumers and mobile providers. CAS understands that clients of the Citizens Advice network in Scotland greatly value being provided information that will assist them in making an informed decision when using or purchasing a service. CAS welcomes the findings of research conducted by Ofcom and colleagues within consumer advocacy bodies throughout the United Kingdom that highlight the significant value that consumers place upon receiving roaming alerts when travelling abroad.

CAS are concerned that presently, some consumers are not receiving the information required to make an informed decision on mobile services when travelling abroad. As per Ofcom's figures highlighted in paragraphs 3.14 - 3.18 and 3.21 - 3.22 of the consultation document, it is evident that there are significant gaps in consumers' knowledge and that the information available on providers' websites is not of the highest quality to effectively inform consumers. CAS understands that unexpected charges as a result of roaming can be challenging for consumers, particularly for financially vulnerable consumers and vulnerable consumers more generally. It is essential for Ofcom, industry and consumer advocacy bodies to understand the context in which consumers find themselves in presently. With many consumers struggling financially, it is essential that consumers are equipped with information and knowledge that assists them in making informed decisions. CAS are aware that many consumers in Scotland are

already struggling with the cost of going on holiday, with 36% of people in Scotland unable to go on holiday over the last year because they couldn't afford it due to the cost-of-living crisis<sup>1</sup>.

Similarly, CAS are concerned that consumers within the United Kingdom can be subjected to unexpected charges through inadvertent roaming while within the UK. While CAS has not seen evidence to suggest consumers in Scotland have experienced this issue, CAS understands from colleagues within the Consumer Council for Northern Ireland and from Ofcom research highlighted in paragraphs 3.23 - 3.29 that this is a hugely significant issue for consumers within Northern Ireland.

### **Question 1: Do you agree with our proposals to introduce rules and accompanying guidance requiring providers to send customers roaming alerts that include information on roaming charges, mobile bill limits and where to access more information?**

CAS fully agrees with Ofcom's proposals to introduce rules and guidance requiring providers to send customers roaming alerts that include information, mobile bill limits and where to access more information. With consideration of the breadth of research presented by Ofcom and others that highlights the importance consumers place on informative roaming alerts, CAS consider that Ofcom is fully justified in its reasoning for the proposed rules and guidance. Additionally, CAS agrees with Ofcom's judgement that existing measures do not adequately protect consumers from the harms identified by Ofcom's and other's research. Furthermore, with the expiry of the Retained Roaming Regulations on 30<sup>th</sup> June 2022 and many providers voluntarily developing measures to provide roaming information, CAS considers that it is essential that Ofcom's proposed rules and guidance are implemented to ensure a standardised and robust level of roaming information. CAS notes the research conducted by Ofcom which highlights that there is a mixed quality and clarity of information available to consumers and we consider that this risks consumers, at present, not being equipped with the knowledge and information required to make a fully informed decision about roaming.

CAS fully agrees with Ofcom's analysis that to make informed choices about using roaming services, to be able to use their device with confidence outside of the UK and avoid unexpected roaming bills, customers need to know when they are roaming and to have timely information on if/what they will be charged and how they can limit their spend. CAS fully agrees with Ofcom's analysis that consumers would significantly benefit from accurate and personalised information relating to any roaming charges that they may receive, as highlighted by research in paragraphs 3.6 - 3.7. We fully agree with Ofcom's proposed changes to GC C3 to require providers to:

- Provide roaming alerts that meet minimum criteria.

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<sup>1</sup> All figures, unless otherwise stated, are from a survey carried out in Scotland by YouGov Plc for Citizens Advice Scotland.

The total sample size was 1509 adults. Fieldwork was undertaken between 13th February - 5th March 2023. The survey was carried out online. The figures have been weighted and are representative of adults in Scotland (aged 18+).

- Have measures in place to enable customers to reduce and/or limit expenditure related to inadvertent roaming while they are in the UK and publish clear, comprehensible and accurate details of those measures, which is easily accessible.
- Provide clear, comprehensible and accurate information to customers about how to avoid inadvertent roaming both in and outside of the UK, particularly in border regions.

## **Question 2: Do you agree with our proposals to introduce rules and accompanying guidance requiring providers to**

### **(a) have and publish measures to enable customers to reduce and/or limit expenditure related to inadvertent roaming while in the UK and**

CAS fully agrees with Ofcom's proposals to introduce rules and accompanying guidance requiring providers to have and publish measures to enable customers to reduce and/or limit expenditure related to inadvertent roaming while in the UK. As previously mentioned, the research conducted by Ofcom and the Consumer Council for Northern Ireland shows that consumers who inadvertently roam while within the UK are subject to significant consumer harm. CAS welcomes any measures that will reduce consumer harm within this area and believes that Ofcom's proposals will go a significant way to achieving this.

### **(b) provide information on how to avoid inadvertent roaming both in and outside of the UK?**

CAS fully agrees with Ofcom's proposals to introduce rules and accompanying guidance requiring providers to provide and publish information on how to avoid inadvertent roaming both in and outside of the UK. We fully agree with Ofcom's analysis that such information will help ensure that customers are able to mitigate the impact of inadvertent roaming and use their device with confidence in the UK and it will particularly benefit customers in Northern Ireland for whom inadvertent roaming is a recurrent issue.

## **Question 3: Do you agree with the proposed implementation period of 6 months from publication of the statement and the changes to General Condition C3 and guidance?**

CAS agrees with the proposed implementation period of 6 months from publication of the statement and the changes to General Condition C3 and guidance.