

Your response

Question	Your response
Do you have any comments on our proposals?	<p>Scotland's Citizens Advice network 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. Citizens Advice Scotland (CAS) is the recognised advocacy body for Scottish consumers in the postal market. We also engage in advocacy activity around issues that consumers face in the telecoms market.</p> <p>CAS understands the challenges of providing fixed broadband, mobile, and postal services that meet the needs of consumers and businesses, especially in rural and remote areas. As such, we are interested in Ofcom's plan of work for 2021/22 and will continue to proactively engage with Ofcom. We welcome the opportunity to respond to this consultation on Ofcom's Plan of Work 2021/22.</p> <p><u>General</u></p> <p>CAS welcomes the commitment to support Ofcom's stakeholder network in Scotland.</p> <p>CAS is broadly content with the major themes proposed in the plan and welcomes the emphasis that the plan places on protecting vulnerable consumers. In our view, the effects of the pandemic are likely to result in increasing numbers of consumers experiencing such vulnerability, whether due to bereavement, financial pressure or physical or mental health issues. CAS believes that there will be a continuing need to support consumers during any recovery period and to ensure that consumers are able to make informed decisions about their use of communications services.</p>

Post

CAS notes Ofcom's commitment to working on a range of postal service issues, including work on sustaining the universal postal service for the future (section 3.11) as part of the **Getting Everyone Connected** priority. We will continue to work constructively with Ofcom to ensure that Scottish postal consumers get the best possible service.

We welcome Ofcom's commitment to review the effectiveness of competition in the letters and parcels market, and to consider the extent to which customers benefit from adequate protections in the market.

Likewise, we support Ofcom's statement (section 3.15) that fairness for customers of communications services should continue to be a key priority. It is vital that consumers are treated fairly by their providers and can trust that markets are operating effectively and without harm to vulnerable consumers.

CAS notes that Ofcom will continue to monitor Royal Mail's performance, efficiency, and consumers' experiences in the postal sector on an annual basis. CAS notes that Quality of Service has been impacted by the pandemic and would welcome Ofcom's continued monitoring of this area along with publication of key data in this regard.

CAS notes the increasing volume of parcel deliveries and declining letter delivery rates highlighted in section 3.11. The increase in demand for parcel delivery is leading to a greater prevalence of multiparty service arrangements (such as the use of last mile operators) which has implications for the operation of this market. CAS also notes the continued prevalence of issues such as surcharging and delivery delays or exceptions which affect consumers outside the central belt of Scotland.

We recognise that Ofcom has commenced its longer-term review of the postal regulatory framework (due to be updated in 2022)

following on from preparatory work undertaken in 2019-20 and 2020-21. We look forward to contributing to discussions around whether additional consumer protections are needed in the parcels market, in light of changes to the market and to the needs of postal users. With the continued rise in parcel services, especially during the pandemic, CAS is of the view that more protections may be needed to prevent consumer harm and that operators other than Royal Mail should also be subject to certain baseline requirements. Further, CAS notes that Ofcom research points to consumer concerns regarding the affordability of services such as redirections and would highlight that such issues are likely to increase given the pandemic's detrimental effect on household and business finances.

Telecoms

CAS welcomes Ofcom's strategic focus on **Investment in Strong, Secure Networks** in the 2021/2022 plan of work.

CAS is aware that the coronavirus pandemic has resulted in an increased reliance upon communications networks. These have played a crucial role in keeping people connected and informed. This reliance on communications services to access public services, which are increasingly delivered digitally, means that it is essential that our communications infrastructure is secure and reliable, for both consumers and businesses.

CAS was pleased to see the 5% increase in access to full fibre services for Scottish consumers and hopes to see this upward trend continue.

CAS broadly supports the Key Priorities identified in sections 3.7 and 3.8 of the Plan and we look forward to viewing Ofcom's Mobile Strategy when this is made available.

With regards to promoting fibre roll-out, CAS supports Ofcom's continued stakeholder engagement in relation to the retirement of the copper network. As Scotland's largest consumer advocacy body, CAS would welcome

engagement with Ofcom regarding the implications of this for consumers.

We also note Ofcom's work on the take-up of higher-speed services in section 3.8. We would urge Ofcom to be mindful of the barriers that consumers may face when considering higher speed services. This is particularly the case for gigabit capable services, which consumers may have relatively little awareness of¹. Consumers must be made aware of the existence of such services, as well as the potential benefits they may have. There may also be more practical barriers to the take-up of such services, including affordability and availability.

CAS welcomes Ofcom's strategic commitment to **Getting Everyone Connected** and supports Ofcom's proposed work in this area.

While we welcome the increased connectivity available to Scottish mobile phone consumers, we would urge Ofcom to continue to monitor the quality and reliability of this coverage. This is particularly important for consumers in rural areas, whose access to internet services is often reliant on 4G and 5G connections. We therefore welcome Ofcom's proposals to provide consumers with improved information on fixed and mobile coverage performance.

CAS also welcomes Ofcom's commitment to improve access to broadband services in the hardest to reach locations. However, we would highlight the issues that consumers still experience when attempting to exercise their rights under the Universal Service Obligation for broadband. We are aware that consumers in rural parts of Scotland have been quoted significantly high prices for the installation of a decent broadband connection (of more than 10mbps). Given the limited availability of decent connections for Scottish consumers in rural areas, we would urge Ofcom to consider what more could be done to ensure affordable, high quality connections are available to consumers in all parts of the UK. We are aware

¹GigaTAG interim report: <https://aaf1a18515da0e792f78-c27fdabe952dfc357fe25ebf5c8897ee.ssl.cf5.rackcdn.com/2249/GigaTAG+Interim+Report.pdf?v=1608208282000>

that Ofcom are mindful of these issues and are actively investigating them.

CAS further welcomes Ofcom's commitment to protecting consumers through the migration of voice calls to Voice Over Internet Protocol.

CAS are fully supportive of Ofcom's key priorities within the **Fairness for Consumers** section. We welcome the focus that Ofcom has placed upon affordability and vulnerability and note that Ofcom has worked proactively with providers throughout the pandemic to ensure that consumers are treated fairly.

CAS understands that the affordability of broadband and mobile services is a significant barrier to consumers accessing online services and we are therefore pleased to see Ofcom's commitment to consider whether any further measures, such as social tariffs, are needed to support consumers who are financially vulnerable. CAS welcomes the provision of social tariffs by some of the major providers, however, we would advocate for these to be available from a greater variety of providers to allow for more consumer choice in relation to these tariffs. We would also advocate for access criteria to be widened out so more consumers on low incomes are able make use of them.

We would highlight that consumers will continue to be vulnerable as the pandemic continues and the financial effects may be long-lasting. We believe that it will be necessary for Ofcom to engage in partnership working with the Competition and Markets Authority and other regulators to ensure markets are operating responsibly and that consumers are effectively signposted to advocacy and advice services for those who need additional help.

We would further urge Ofcom to continue to keep under review the voluntary commitments made by providers during the early months of the coronavirus pandemic. The effects of the pandemic are still being felt by consumers as we enter 2021. There are significant concerns from Citizens Advice Bureaux that debt levels may increase, across regulated utilities, and we feel that consumers would benefit from the continuation of those voluntary commitments.

In recent months we have seen from our own data that the levels of mobile telecoms debt are beginning to rise. Therefore we would urge Ofcom to continue to keep a close eye on how providers are responding to customers who may be financially vulnerable.

CAS welcomes Ofcom's new role as the regulator for UK-Established-Video-Sharing-Platforms. We further note that the UK Government is minded to appoint Ofcom as the future regulator for **protecting users from harmful online content**. We recognise that this will be a significantly new area of work for Ofcom to engage in.

We would highlight to Ofcom that our public advice site has seen significant increases in people searching for advice relating to Domestic Violence and the Sharing of Intimate Images. Advice sought in relation to Domestic Violence increased by 78% in the period between March 2020 and June 2020. We have seen a continued rise in advice sought in relation to Sharing of Intimate Images since February 2019 to May 2020, which increased by 275% in that period. CAS would recommend that Ofcom should engage with the Scottish Government and with stakeholder bodies representing those who have experienced online abuse and harm on these matters, in the event that Ofcom is appointed as the regulator for protecting users from online harms.