



# Ofcom's proposed Plan of Work 2024/25

The Consumer Council response

9 February 2024

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## Consultation response form

<b>Consultation title</b>	Ofcom's proposed Plan of Work
<b>Full name</b>	✂
<b>Contact phone number</b>	✂
<b>Representing (delete as appropriate)</b>	Organisation
<b>Organisation name</b>	Consumer Council Northern Ireland
<b>Email address</b>	✂

### Confidentiality

We ask for your contact details along with your response so that we can engage with you on this consultation. For further information about how Ofcom handles your personal information and your corresponding rights, see [Ofcom's General Privacy Statement](#).

<b>Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.</b>	<input checked="" type="radio"/> Nothing / Your name / Organisation name / Whole response / Part of the response (you will need to indicate which question responses are confidential)
<b>Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.</b>	<input checked="" type="radio"/> None / Whole response / Part of the response (you will need to indicate below which question responses are confidential)
<b>For confidential responses, can Ofcom publish a reference to the contents of your response?</b>	<input checked="" type="radio"/> Yes / No

### Your response

Question	Your response
<b>Question 1: Do you have any comments on Ofcom's proposed Plan of Work 2024/25?</b>	Confidential? – Y/ <input checked="" type="radio"/> N  Full response detailed in this document

Please complete this form in full and return to [planofwork@ofcom.org.uk](mailto:planofwork@ofcom.org.uk)

## Executive summary

The Consumer Council welcomes the opportunity to comment on Ofcom's proposed Plan of Work.

As Northern Ireland's consumer representative body, we share much common ground through extensive statutory powers in areas such as consumer affairs, energy, transport, food accessibility and non-statutory functions covering unfair practices in any market.

As consumers continue to experience the worst Cost-of-Living crisis in decades, it is incumbent on regulators like Ofcom to support consumers facing financial hardship, particularly vulnerable consumers. The Consumer Council appreciates and welcomes Ofcom's response to issues around affordability in telecoms, and its aim to improve awareness of solutions for the most vulnerable consumers such as social tariffs.

The Consumer Council supports Ofcom's expanded range of duties and powers as the online safety regulator and welcome the implementation of the online safety regime. To be successful these new duties must be understood by consumers and result in increased safety online, and easier reporting of harmful content.

We are supportive of the Annual Plan and the continued focus on tackling key areas of cost for consumers and commitment to focus on consumers who need help the most. We have used this consultation to highlight key Northern Ireland considerations for the year ahead including:

- Telecoms is an essential service for Northern Ireland consumers particularly in the areas of broadband and mobile.
- Understanding regional difference is important. Consumer detriment can be significant at a regional level but relatively small in comparison to the UK, meaning issues of consumer detriment in Northern Ireland struggle to be prioritised on a UK basis e.g. mobile roaming protections.
- The achievement of fairness for consumers necessitates different approaches to protections across UK regions. This is of particular relevance in Northern Ireland where the small size of our market, geographical separation from the

UK market, an EU land border, different regulatory regimes, and implementation of the Windsor Framework create a unique environment for businesses, and different challenges for consumer access, opportunities, and protections.

- Due consideration should be given to unfair behaviour and practices beyond EU Exit, whether in relation to market access or any divergence of regulations and standards.

We support Ofcom's proposal to ensure all postal users continue to have access to affordable and reliable services across the UK. We welcome Ofcom's commitment to focus on affordability, quality of service, USO reform and regulatory reporting of postal services. We have used this consultation to highlight key Northern Ireland considerations for the year ahead including:

- Postal services are essential to Northern Ireland consumers especially those in vulnerable situations.
- Ensuring access to affordable services is vital and the existing regulatory price cap mechanism for second class letters is an important safeguard for consumers.
- Quality of Service targets are an important part of the regulatory framework and help ensure consumers receive the level of service for the price they have paid.
- Before any USO reform, consumer needs must be taken into consideration.

The Consumer Council have worked with Ofcom throughout the year and inputted to various consultations including Mobile roaming – Strengthening customer protections, Review of ADR in the telecoms sector, and Prohibiting inflation-linked price rises. This work is vital to allow the Consumer Council to represent the lived experiences of consumers in Northern Ireland, particularly the most vulnerable.

Throughout 2023 the Consumer Council conducted considerable research in areas that relate to this consultation including:

- Consumers' Views and Behaviours in Response to the Rising Cost of Basics - not yet published
- Broadband Affordability and Accessibility research – not yet published

- Northern Ireland Household Expenditure Tracker Q2 2023 – November 2023
- Northern Ireland Consumers and Online Detriment – December 2023
- Mobile Roaming Experiences of Northern Ireland Consumers – July 2023
- Insight survey – February 2023
- Postal Price Cap survey – July 2023
- The Parcel Experience after EU Exit – Delivering for small and micro businesses – March 2023
- The Parcel Experience after EU Exit – Delivering for consumers – March 2023
- We carried out a qualitative study on the Impact on Consumers of Changes to Royal Mail's Universal Service Obligation in December 2023 which we aim to publish in February/ March 2024.

We have used this research as an evidence base for our response.

## About us

The Consumer Council was established in April 1985 as a non-departmental public body (NDPB) under the General Consumer Council (Northern Ireland) Order 1984 (The Order). We operate under the Department for the Economy (DfE) on behalf of the Northern Ireland Executive.

Our vision is to protect and empower consumers in Northern Ireland by ensuring the legislation and regulation for consumer protection works effectively for consumers here.

Our mission is to be the trusted go-to organisation for Northern Ireland consumers, working with governments and stakeholders to inform policy and decision-making, using our research, insight and expertise to deliver positive outcomes for consumers.

We have statutory duties in relation to consumer affairs, energy, postal services, transport, water and sewerage, and food accessibility. These include responding to enquiries, investigating complaints, carrying out independent research, educating and empowering consumers, and advising government on matters relating to consumer affairs.

Our non-statutory functions educate and empower consumers against unfair or discriminatory practices in any market including financial services. We are also a designated super-complaints body under the Enterprise Act 2002 and the Financial Services and Markets Act 2013.

As an insight-led evidence-based organisation, we:

- Provide consumers with expert advice and confidential guidance.
- Engage with government, regulators and consumer bodies to influence public policy.
- Empower consumers with the information and tools to build confidence and knowledge.
- Investigate and resolve consumer complaints under statutory and non-statutory functions.



- Undertake best practice research to identify and quantify emerging risks to consumers.
- Campaign for market reform as an advocate for consumer choice and protection.

We have responsibilities under the Rural Needs Act 2016 and Section 75 of the Northern Ireland Act 1998 to ensure government policies recognise consumer needs in rural areas, and promote equality of opportunity and good relations across a range of equality categories.

We represent and campaign on behalf of all Northern Ireland citizens, in particular those in vulnerable circumstances, and pay particular regard to consumers:

- who are disabled or have long-term health conditions
- who are of pensionable age
- who are on low incomes
- who live in rural areas

We use a set of eight guiding principles developed by the United Nations to assess where the consumer interest lies, and develop and communicate our policies, interventions and support. These provide an agreed framework through which we approach regulatory and policy work.

**Figure 1: Consumer Principles**



The principles ensure we apply a consistent approach across our statutory and non-statutory functions, and in all our engagement with consumers and stakeholders.

They serve to protect consumers, setting out the minimum standards expected from markets when delivering products or services in Northern Ireland. They also frame our policy position and approach to resolving consumer disputes with industry, offering a straightforward checklist to analyse and validate outcomes, in particular among vulnerable groups and consumers with a disability.

### **Super-complaints**

We are a designated super-complaints body set up under the Enterprise Act 2002 and the Financial Services and Markets Act 2000 Order 2013.

Under both Acts, the Consumer Council can, if we believe any feature or combination of features of a market in the United Kingdom (UK) is, or appears to be, significantly harming the interests of consumers, raise a super-complaint on behalf of consumers to the following regulators:

- Civil Aviation Authority
- Competition and Markets Authority
- Financial Conduct Authority
- Office of Communications
- Office of Gas and Electricity Markets
- Office of Rail and Road
- Payment Systems Regulator
- Northern Ireland Utility Regulator
- Water Services Regulation Authority

Under the Gas and Electricity Licence Modification and Appeals Regulations (Northern Ireland) 2015, we can appeal to the CMA if we believe a modification by the Utility Regulator to the licence of a gas or electricity provider is detrimental to the interests of consumers.

## **EU Exit**

The Order also gives the Consumer Council powers to monitor and report on the real and perceived impacts for consumers in light of Northern Ireland's unique position of being in the UK customs territory with access to the EU single market for goods, and the considerations of the NI Protocol, and more recently, the Windsor Framework.

It allows the Consumer Council to educate and empower consumers to understand how any changes might affect them and what actions they need to take. The work we carry out is aligned to the following Articles of the NI Protocol:

- Article 4: Customs territory of the UK
- Article 5: Customs, movement of goods
- Article 6: Protection of the UK internal market
- Article 9: Single electricity market
- Article 11: Other areas of North-South cooperation

## Response to consultation question

### Question 1: Do you have any comments on Ofcom's proposed Plan of Work 2024/25?

The Consumer Council is pleased to respond to Ofcom's proposed Plan of Work for 2024/25. Our reading of the consultation document is that Ofcom will prioritise the following consumer outcomes:

- Internet we can rely on
- Media we trust and value
- We live a safer life online, and
- Enabling wireless services in the wider economy

To ensure all consumers receive the same protection, irrespective of where they are in the UK, it is vital regulators understand regional differences when considering interventions to protect consumers and prevent harm.

We recognise the vital role Ofcom plays across a wide portfolio however, our response will focus on the areas where we feel we have evidence or expertise that is relevant.

### Northern Ireland context

Northern Ireland is unique in comparison to other regions of the UK. The small size of our market, geographical separation from the UK market, an EU land border, different regulatory regimes, and implementation of the Windsor Framework create a unique environment for businesses, and different challenges for consumer access, opportunities, and protections.

Equally Northern Ireland differs financially from the rest of the UK. With regards to consumer affordability, our latest Northern Ireland Household Expenditure Tracker<sup>1</sup> has found the discretionary income of our lowest earners, Quartile 1 households, is less than £27 per week and they spend 54% of total income on food (21%), rent and

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<sup>1</sup> Northern Ireland Household Expenditure Tracker Q2 2023  
<https://www.consumercouncil.org.uk/research/q2-2023-northern-ireland-household-expenditure-tracker>

utilities (21%) and transport (12%). The weekly discretionary income of Quartile 2 households rises to just £77. The households in Northern Ireland are more financially vulnerable than their UK counterparts. Gross household income for the lowest earning households in Northern Ireland is 9% lower than the equivalent households in the UK (£258.34 versus £284.15) and 71% of these households' income is derived from social securities (benefits) compared to the UK (60%).

The Consumer Council's 'Consumers' Views and Behaviours in Response to the Rising Cost of Basics'<sup>2</sup> research demonstrates that the majority of consumers (90%) in Northern Ireland are concerned or very concerned about the cost of basics, with over two-thirds (67%) concerned about the cost of communication and technology.<sup>3</sup> Over four in ten (44%) consumers struggle to afford the cost of basics with over a third (38%) saying that they were dipping into savings to cope with the cost of basics.

A higher proportion of consumers in vulnerable circumstances are more concerned about the cost of communication and technology. Those in receipt of Universal Credit (79%) and those with a disability (74%) show higher levels of concern about the cost of communication and technology in comparison to the general population (67%).

As consumers continue to experience the Cost-of-Living crisis, it is vital for Ofcom to support consumers facing financial hardship and put preventative measures in place to minimise detriment.

## Internet we can rely on

The Consumer Council supports Ofcom's aim to protect the interests of consumers, and their ability to access fast reliable connections. Consumers should have available high-quality networks that are reliable and secure that they can depend on.

The Consumer Council's research 'Broadband Affordability and Accessibility'<sup>4</sup> found almost three-quarters (74%) of consumers in Northern Ireland were satisfied with the

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<sup>2</sup> Consumers' Views and Behaviours in Response to the Rising Cost of Basics Research (not yet published)

<sup>3</sup> Concern about the cost of basics broken down by specific areas of essential spend include: 91% concerned about home energy costs, 80% concerned about food and non-alcoholic beverages, 71% concerned about transport costs, 67% for communication and technology, and 64% regarding mortgage/ rent/rates.

<sup>4</sup> CCNI Broadband Affordability and Accessibility research (not yet published)

speed of their broadband service. Less likely to be satisfied were those living in rural areas (65%) and those with a disability (65%).

Almost a quarter (23%) of consumers face broadband connection issues on account of where they live, rising to nearly one in three (31%) for those living in rural areas.

We welcome Ofcom's support to consumers in Northern Ireland through changes in communications technologies such as 2G/3G switch-off and support migration to VoIP, ensuring the benefits of improved connectivity are realised across Northern Ireland.

We would urge specific consideration be given to vulnerable consumers, including those in rural areas and those with a disability. Steps should be taken to ensure that when it comes to the availability of high-quality networks that are reliable and secure, the needs of vulnerable consumers are prioritised. In addition, it would be of benefit to outline what type of consumers are defined as vulnerable in this proposed plan of work for 2024/25.

## **Improving information on network performance**

The Consumer Council supports the call for better information on network performance enabling consumers to make informed choices about the network that best suits their needs.

Due to the increasing digitisation and the migration of many essential services online as a result of the pandemic, we have conducted a considerable amount of research over the last 12 months to determine the impact on Northern Ireland consumers. This has given us additional insight into the experience and concerns of consumers when it comes to digital literacy, online harm, mobile roaming, and broadband affordability and accessibility.

From our 'Broadband Affordability and Accessibility' research, we know that close to a fifth (18%) of consumers in Northern Ireland find it difficult to understand what broadband speeds are right for them. Improving information on network performance will increase consumers' ability to make informed decisions about their telecommunications services and be able to shop around for the best deals.

Also relevant is our 'Consumers' Views and Behaviours in Response to the Rising Cost of Basics' research, which found that four in ten (41%) consumers have found it difficult or very difficult to switch and save on internet and broadband, and over a third (36%) found it difficult to switch and save on mobile phone usage. When asked why it is difficult to switch and save the most common reasons cited included:

- being locked into or still in the contract
- the process to change provider is complicated/difficult
- there are too many options/variables to make comparisons
- difficult to understand and concerned about changing technology

The Consumer Council agrees that for consumers to get the right services for them, they need to be able to successfully engage with the market – they need clear information that they can easily understand. We support the review of the practice of inflation-linked in-contract price rises to ensure consumers have clarity and certainty about what they will pay for telecoms products and will be responding to this consultation.

## One Touch Switch

The Consumer Council supports the planned launch of the One Touch Switch project in March 2024. It is important that Ofcom monitor and report on the implementation of this project, to ensure there is clear consumer benefit.

For One Touch Switch to be meaningful and succeed it will be important for consumers to have broadband choice to be able to avail of the benefits.

In our 'Broadband Affordability and Accessibility' research 97% of consumers in Northern Ireland say that internet access at home is important to their daily life. However, nearly a third (32%) said they had less choice in broadband providers due to where they live, and four in ten (41%) found it difficult or very difficult to switch and save on internet and broadband.

It will be essential that this initiative is promoted widely to ensure consumers understand their rights and protections and the benefits of switching. Work should be considered in partnership with consumer bodies to promote the benefits and ease of switching, improving consumer choice.

The Consumer Council is well placed to work with Ofcom in this area due to our experience of informing consumers about varying energy tariffs and empowering them to switch to the best deal.

## **Affordability**

Consumers should be able to access affordable telecommunication services, and we welcome Ofcom's reporting on affordability and monitoring of social tariffs. We know from our 'Broadband Affordability and Accessibility' research that around one in six (15%) consumers in Northern Ireland have struggled to pay their broadband bill in the last 12 months, with one in five (21%) saying it was not affordable. Amongst those who struggled to pay, around two in five (42%) paid their bill but made cuts elsewhere, whilst about a fifth (22%) missed at least one payment.

Broadband affordability is an additional struggle for Northern Ireland's most vulnerable consumers. The research demonstrates that consumers in vulnerable groups are much more likely to struggle to pay their broadband bill, those with a disability (27%), those from low-income households (18%), and those in receipt of benefits (25%).

The Consumer Council supports Ofcom's continued monitoring of the affordability of telecom services in addition to monitoring whether providers are treating vulnerable customers fairly and stress the importance of the vital work they do in this area.

## **Mobile coverage and roaming customers' protections**

Last year we welcomed the opportunity to work with Ofcom on mobile roaming research examining consumers' experiences as a result of the reintroduction of mobile roaming charges.

This is an additional financial concern, particularly for consumers in Northern Ireland, given the land border with the EU and the potential for inadvertent/unintended roaming charges.



The research showed that around three in ten (28%) consumers in Northern Ireland had experienced inadvertent/unintended roaming<sup>5</sup>. Over one in five (22%) had experienced inadvertent/unintended roaming on the Republic of Ireland/Northern Ireland border, with over a third (32%) experiencing consequences as a result. The most likely penalties included additional charges by their provider (14%) and having their services restricted (9%).

We welcome the continued focus on mobile coverage and roaming customer protection in Ofcom's proposed Plan of Work for 2024/25.

## Social tariffs

We appreciate and welcome Ofcom's response to issues around affordability in telecoms, and their aim to improve awareness of the options available (such as social tariffs) by working with government, consumer advocacy groups, charities, and other relevant stakeholders.

Awareness of social tariffs continues to be low in Northern Ireland, we know from our 'Vulnerable Consumers and Online Detriment'<sup>6</sup> research that most consumers were not aware of social tariffs (86%), those that did know about social tariffs (14%) were most likely to have seen them advertised online (40%), followed by learning about them from friends and family (20%). As cited previously, 71% of the lowest earning households' income in Northern Ireland derives from social securities (benefits) in comparison to the 60% in the UK. Continuing to raise awareness of social tariffs will be vital for those eligible and struggling to manage the cost of their broadband.

We look forward to partnership working in this area, helping promote social tariffs in Northern Ireland and reducing the financial burden for consumers.

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<sup>5</sup> 'Mobile Roaming Experiences of Northern Ireland Consumers'

<https://www.consumercouncil.org.uk/research/mobile-roaming-experiences-northern-ireland-consumers>

<sup>6</sup> Vulnerable Consumers and Online Detriment research

<https://www.consumercouncil.org.uk/sites/default/files/2023-12/Final%20Version%20-%20NI%20Consumers%20and%20Online%20Detriment.pdf>

## We live a safer life online

We welcome Ofcom's expanded range of duties and powers as the online safety regulator and support their long-standing work to improve media literacy through their "Making Sense of the Media" programme.

Consumers should be aware of what they can do to be safer online, and easily report harmful content. The shift to digitalisation, accelerated by the COVID-19 pandemic, has transformed consumer expectations and access but so has the risk landscape and prominence of digital exclusion. Digital markets help many consumers overcome vulnerability, but equally, discriminatory, unethical, or criminal practices can exacerbate and exploit it.

The Consumers Council's research demonstrates the need for greater consumer protection and digital literacy. Our latest Insight Survey<sup>7</sup> found that almost two in five (38%) had been targeted by a scam in the last three years. The most likely methods of scams include email (63%), telephone calls (54%), and text messages (45%). Amongst those who had fallen victim to a scam, around two-thirds (67%) said they had been affected financially, and nearly three in five (55%) said their physical and emotional well-being was affected.

Also relevant is our research 'Vulnerable Consumers and Online Detriment'. This found that over half of consumers in Northern Ireland (56%) said they had encountered negative online content in the past year, with scams, fraud, or phishing the most prevalent (53%). Those who were confident using the internet were more likely to report having a negative online experience (60%) and were more likely to take action when they experienced online harm. However, many in the focus groups felt that reporting negative content would not achieve anything, or they did not know how to report it or who to report it to. Of those who experienced negative content online, 74% took at least one action. The most likely actions taken were to unfollow/unfriend/block (42%) and report the content (36%), with one quarter saying they did nothing (26%).

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<sup>7</sup> Insight Survey <https://www.consumercouncil.org.uk/research/consumer-insights-survey-2023>

The Consumer Council's Insight Survey reflects this with just over two in five (42%) consumers in Northern Ireland knowing where to report a scam, around three in ten (31%) did not know, and a similar number (28%) were not sure.

Based on priorities set out in the Online Safety Act, we support Ofcom seeking to achieve "choice" for consumers. Consumers need to be aware of what they can do to be safe online, including controlling the content they see, the people they interact with, and being able to easily report harmful content. It will be imperative that consumers understand what these new powers are and how to engage with them to improve their online safety.

It will also be vital to work with other regulators where markets intersect to ensure consumers have positive opportunities, access and outcomes when interacting with digital markets.

## **Enabling wireless services in the wider economy**

### **Regulation of postal services**

#### **Affordability**

The Consumer Council believes the Universal Postal Service must be affordable to all consumers across the UK. Ofcom's user needs research<sup>8</sup> shows that affordability is the most important feature of the postal service for UK consumers. Similarly, for SMEs across the UK, affordability was the second most important feature of the postal service. This underlines the need for a regulatory framework which ensures consumers and SMEs do not have affordability issues with the Universal Postal Service.

In December 2023 the Consumer Council carried out research<sup>9</sup> to explore the potential impact of any changes to the Universal Service Obligation (USO) on consumers in Northern Ireland that use and/or rely on the services. The research

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<sup>8</sup> [https://www.ofcom.org.uk/\\_\\_data/assets/pdf\\_file/0014/208220/2020-review-of-postal-user-needs-report.pdf](https://www.ofcom.org.uk/__data/assets/pdf_file/0014/208220/2020-review-of-postal-user-needs-report.pdf)

<sup>9</sup> Qualitative Study on the Impact on Consumers of Changes to Royal Mail's Universal Service Obligation November 2023 (not yet published)

was a qualitative study which involved eleven focus groups with each group representing one of Northern Ireland's local government districts.

Across the focus groups, the Cost-of-Living crisis was a common concern. There was concern that Royal Mail prices had increased significantly, in particular the cost of stamps. There were suggestions among participants that there should be special rates across the various Universal Postal Services, in addition to the existing price cap, for those of retirement age, the unemployed, and those with disabilities. These consumers in vulnerable situations depend heavily on the services provided by Royal Mail and were worried if prices continued to increase, they would not be able to afford to use the services.

Some of those in the focus groups who were students felt that if Royal Mail reduced prices for packages they would be more inclined to return unwanted and unsuitable goods that they had purchased. Uniform pricing across the UK was considered very important by participants, particularly by those selling items online.

The only price protection condition that Ofcom applies within its regulatory framework is the safeguard cap for second-class letters (up to 2kg). The second-class service is the most basic part of the Universal Postal Service which must be affordable to all consumers. In this context, the existing regulatory price cap mechanism is an essential safeguard for consumers.

## Quality of service

The Consumer Council welcomed Ofcom's decision to fine Royal Mail £5.6 million for a significant failure to meet its postal delivery targets in the past financial year<sup>10</sup>. The investigation launched by Ofcom found Royal Mail fell short of its performance targets across the 2022 to 2023 financial year for first- and second-class mail deliveries. We welcome Ofcom's decision to further assess Royal Mail's quality of service performance during 2023/24, and its consideration on opening a further investigation into Royal Mail's ongoing performance issues.

The Consumer Council emphasises the importance of the Quality of Service (QOS) targets and Ofcom's role in ensuring Royal Mail meets these targets.

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<sup>10</sup> [Royal Mail fined £5.6m for missing delivery targets - Ofcom](#)

Our research in December 2023<sup>11</sup> showed some participants acknowledged an increase in letter delivery delays, apparent in many cases via the length of time between the date stamp on the letter and when it was received. Among those who received a high volume of medical letters, there were instances of missed appointments because they had not received the letter with enough advance notice of the appointment date. In addition to not benefitting from the appointment, there was concern about the possibility of multiple missed appointments leading to a discharge.

Improving Royal Mail QOS performance must be a priority for Ofcom's postal work in 2024/25.

## USO Reform

The Consumer Council acknowledges the Ofcom 'Call for input: The future of the universal postal service'<sup>12</sup>, released on 24 January 2024. It is our understanding that following the closure of this call for input on 3 April 2024 Ofcom will consider all stakeholder input, assess the options and provide an update in the summer of 2024 on the next steps.

Ofcom have a duty to ensure that the USO meets the needs of users. The Consumer Council welcomes its decision to seek stakeholder input and views on these areas. As part of our work programme for 2024/25, we intend to engage with consumers to further understand their views and experiences in relation to changes to the Universal Postal Service.

From our December 2023 research, we found:

- Having uniform prices throughout the UK and the same service standards was positively received by Northern Ireland consumers. Royal Mail was thought to be protecting the Northern Ireland consumer with their uniform pricing obligation.
- The current frequency of delivery and collection matched consumer needs. However, any potential reduction in the frequency of delivery and collection

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<sup>11</sup> Qualitative Study on the Impact on Consumers of Changes to Royal Mail's Universal Service Obligation November 2023 (not yet published)

<sup>12</sup> [Call for input: The future of the universal postal service - Ofcom](#)

would feel like a backward step rather than an evolution to meet consumers' needs.

- For older participants and those with disabilities, the frequency of letter delivery and collection was most important. This was primarily due to the number of medical appointments they were receiving via post.
- For younger participants and those shopping online frequently, parcel collection and delivery was considered more important than letters.

The Consumer Council will respond to the Ofcom call for input in greater detail to highlight the potential impact of any USO changes on Northern Ireland consumers. We look forward to continuing to work with Ofcom to ensure that regulatory protection continues and is effective in preventing consumer detriment.

### **Regulatory reporting**

The Consumer Council welcomes Ofcom's decision to continue monitoring work across the postal sector, which will look at the impact of obligations on the parcels market for the handling of complaints, the obligation on operators to ensure the fair treatment of disabled customers, and Royal Mail's efficiency progress and the longer-term sustainability of the postal USO.

This work will be particularly important in 2024/25 as new parcel movement arrangements under the Windsor Framework are implemented from 30 September 2024.

We look forward to engaging with Ofcom on these areas throughout 2024/25.

## Conclusion

The Consumer Council welcomes the opportunity to comment on Ofcom's proposed plan of work for 2024/25 and supports Ofcom's commitment to furthering the interests of telecoms consumers.

We support Ofcom's expanded range of duties and powers as the online safety regulator and welcome the implementation of the online safety regime. Consumers should be aware of what they can do to be safer online, and easily report harmful content.

In this consultation response, we have highlighted the importance of understanding regional differences and key considerations for Northern Ireland including the implementation of the Windsor Framework.

Our response demonstrates how Northern Ireland consumers, particularly vulnerable consumers, are experiencing significant economic impacts. Telecoms and post are essential services for consumers in Northern Ireland and as the Cost-of-Living crisis continues, it is incumbent on regulators like Ofcom to support consumers facing financial hardship.

The Consumer Council appreciates and welcomes Ofcom's response to issues around affordability in telecoms, and its aim to improve awareness of solutions for the most vulnerable consumers such as social tariffs. Only 14% of Northern Ireland consumers are aware of social tariffs, therefore continuing to raise awareness will be vital for those struggling to manage the cost of their telecoms.

For consumers to get the right services for them, they need to be able to successfully engage with the market – they need clear information that they can easily understand. Consumers should be able to make informed choices about what best suits their needs, and we welcome working in partnership to promote the work Ofcom is doing in addition to amplifying the messaging around social tariffs and the One Touch Switch project.

We welcome Ofcom's planned changes to communications technologies, ensuring the benefits of improved connectivity are realised across Northern Ireland. Specific consideration should be taken for vulnerable consumers, including the needs of those in rural areas and those with a disability being prioritised to mitigate detriment.

The Consumer Council look forward to providing a response to the Ofcom call for input on potential USO reform. We will highlight how any changes may impact Northern Ireland consumers.

We are supportive of Ofcom's decision to assess Royal Mail's Quality of Service (QOS) performance during 2023/24. The QOS targets are an important part of the regulatory framework and help ensure consumers receive the level of service for the price they have paid.

We welcome Ofcom's commitment ensure that the USO meets the needs of users and provides affordable services. It is important that the Northern Ireland consumers do not feel they are treated differently because of which part of the UK they live in. Having uniform postal prices throughout the UK and the same service standards is essential.

The Consumer Council looks forward to working with Ofcom throughout its work plan and engaging on key consumer policy issues across areas of shared interest. Although outside of Ofcom's Proposed Plan of Work for 2024/225, we also look forward to a closer working relationship with Ofcom and continuing discussions to become the region's consumer advocate for telecoms.

We are keen to support Ofcom in ensuring Northern Ireland consumers are adequately protected and markets are regulated in a way that prevents harm, producing clear consumer benefits.



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