

Ofcom's proposed Plan of Work 24/25

Citizens Advice Scotland response

The Citizens Advice network in Scotland

The Citizens Advice network is Scotland's largest independent advice provider. We empower people to realise their rights by providing free, confidential and person-centred advice across **59 local Citizens Advice Bureaux (CAB)**¹ in every corner of Scotland, as well as through our **Extra Help Unit (EHU)** which supports people across Great Britain with the most complex and urgent energy issues. Alongside our network of local, volunteer-based CAB, **Citizens Advice Scotland (CAS)**, the national membership body, looks at the problems people bring to the network and advocates for positive change where it is needed most.

Our holistic advice and support changes lives. Every year, more than 2 million people visit our online advice pages, while CAB provide tailored support to nearly 200,000 people across Scotland. On around 40% of occasions the network provides advice on more than one issue, reflecting the often clustered nature of issues people experience as well as the person-centred and holistic nature of our service. In 2023/24, our support put over £158m in financial terms alone back into people's pockets and local communities.

CAS comments

CAS welcomes this opportunity to respond to Ofcom's proposed plan of work. In the past year CAS has worked closely with colleagues throughout Ofcom and the telecoms industry to assist in the delivery of positive outcomes for consumers of telecommunication services. Overall, CAS welcomes the consumer outcomes prioritised in this workplan, particularly around "internet and post we can rely on" and CAS remains well placed to support Ofcom on delivering these outcomes, through the in-depth consumer evidence and insights generated from across Scotland's Citizens Advice Network.

CAS would like to commend Ofcom on some significant outcomes achieved in 24/25 that will ultimately improve outcomes for consumers throughout the telecoms market:

- **Bans on mid-contract price rises linked to inflation.** CAS welcomed the opportunity to feed into Ofcom's work in this area and we welcome Ofcom's decision to introduce new consumer protection rules. This action will ensure

¹ Each of the 59 CAB are local, independent charities.

that consumers will have clarity about how much they will be paying for their internet connection, empowering consumers to make

- **Prices have remained flat or have fallen year on year in real terms².** CAS welcomes this news and recognises that Ofcom's effective regulation of the telecoms market has allowed consumers to access a wide range of choice within the market at affordable prices.
- **More people are benefiting from the savings and protections offered by social tariffs³.** CAS welcomes Ofcom's findings that take-up of fixed and mobile social tariffs, grew by 125,000 (33%) to 506,000 in the nine months to June 2024. CAS will continue to advocate for increased awareness of social tariffs to those who are eligible.
- **One Touch Switch process.** CAS welcome's Ofcom's efforts to establish a process in which landline and broadband consumers can switch easily. This process will support more consumers to utilise the benefits of shopping around and switching provider when they are out of contract.

Mobile coverage

CAS welcomes Ofcom's continued monitoring of mobile coverage to improve the accuracy and consistency of available coverage and performance information. This work is essential for consumers to make informed decisions about their mobile provider, particularly for rural consumers where not spots and poor connectivity is more prominent. We would welcome potential improvements for how this information is presented and communicated to consumers.

Protecting vulnerable customers

CAS welcomes Ofcom's work to protect vulnerable customers and ensure that they are treated fairly. We particularly welcome Ofcom's plans to work with regulatory colleagues and we would hope that this leads to the sharing of best practice within respective markets. CAS would ask Ofcom to consider analysing the impact of the voluntary guidance issued under the Treating Vulnerable Customers Fairly Guide to establish where providers are successfully implementing policies for vulnerable customers in this area. CAS would also urge continued engagement with consumer bodies such as CAS and other organisations representing vulnerable groups in order to understand if this guidance is being effectively utilised by providers. We particularly welcome Ofcom's proposed plan to work alongside colleagues within the United Kingdom Regulators Network (UKRN)

² <https://www.ofcom.org.uk/siteassets/resources/documents/research-and-data/multi-sector/pricing/2024/pricing-trends-for-communications-services-in-the-uk-2024.pdf?v=387092>

³ <https://www.ofcom.org.uk/siteassets/resources/documents/research-and-data/multi-sector/pricing/2024/pricing-trends-for-communications-services-in-the-uk-2024.pdf?v=387092>

Affordability

CAS welcomes Ofcom's continued work on affordability, which remains a significant and priority issue for consumers in Scotland as the cost of living crisis continues. We are hugely supportive of Ofcom's work to date on this issue, as we welcome the efforts made by Ofcom and providers to offer and promote social tariffs. While uptake and awareness of these offers amongst eligible consumers remains low, CAS has undertaken work to ensure that the Scottish Citizens Advice Network can support consumers who may be eligible and wish to take up a social tariff. Ofcom's commitment to continue monitoring social tariff availability, promotion, and take-up, and help raise awareness is very welcome.

However, CAS remains concerned that the narrow eligibility criteria of many social tariffs currently on the market is creating a barrier to take-up. CAS would request Ofcom to take note that some providers offer social tariffs to a wide range of consumers, such as consumers in receipt of Universal Credit, Pension Credit and Personal Independence Payments etc and some smaller providers have recently offered social tariffs to all consumers. This is in contrast to providers with significant market share, who offer social tariffs only to consumers in receipt of Universal Credit. CAS would urge Ofcom to encourage providers to widen their eligibility criteria to ensure that consumers who would benefit from a social tariff can access them. Likewise, CAS would support work by Ofcom to ensure that consumers can switch to a provider that is offering a social tariff without incurring an Early Termination Charge in the situation where their current provider does not offer a social tariff.

CAS would further encourage Ofcom to consider working with providers to widen the eligibility criteria to include certain vulnerable consumers who may not yet be receiving a qualifying social security benefit. Vulnerable groups who could benefit from accessing a social tariff may include survivors of domestic abuse, consumers who have caring responsibilities, consumers who are care leavers, veterans, those being released from custodial sentences, and those living in sheltered / supported accommodation.

Migration from legacy services

While CAS makes no comment on the justification for the transitions from 2G and 3G services, CAS trusts that Ofcom will work with providers in a similar manner to the migration to VOIP to ensure that vulnerable consumers are protected and the potential for detriment is addressed. CAS would remind Ofcom that disabled consumers may be particularly reliant on 2G and 3G only devices which are built with accessibility in mind and would encourage Ofcom to work with providers to ensure such consumers are supported. CAS would urge Ofcom to encourage providers to undertake an Equality Impact Assessment or similar process to identify and mitigate any detrimental impacts of the 2G and 3G switch off.

CAS would welcome any analysis from Ofcom relating to the impact of the transition away from 2G and 3G on services such as smart meters, with many consumers using

smart meters that utilise 2G and 3G networks. We welcome Ofcom's expectation of providers that customers should be treated fairly during this transition, and we would trust that providers would work on this issue in a similar manner to that being adopted on the migration to VOIP to ensure consumers are not subject to detriment as a result.

Scotland

CAS welcomes Ofcom's proposed work to deliver positive outcomes for consumers in Scotland. CAS strongly appreciates our engagements with colleagues within the Ofcom Scotland team and we look forward to continuing to work with them in 25/26. We welcome Ofcom's understanding of the unique geography of Scottish communities and the impact of this on the networks that they utilise. We welcome plans to work with colleagues within the Scottish Government to strengthen connectivity through the delivery of key infrastructure projects. However, CAS would suggest to Ofcom that to improve uptake and efficacy of these schemes, work is required to ensure that consumers are clearly informed of the range of schemes available and how to access them. CAS would consider that it would be difficult for digitally excluded or vulnerable consumers to navigate these schemes, thereby preventing uptake.

Digital Inclusion and Media Literacy

CAS welcomes Ofcom's recognition that people increasingly live their lives online and that accessing digital services is essential for many day-to-day tasks.

CAS would state that across all markets and services, greater recognition is needed that as essential services become ever more digitised, so too the digital divide becomes increasingly detrimental – the risks and negative outcomes are exacerbated for those being left behind i.e. those who are digitally excluded for reasons of affordability, connectivity, or skills and confidence.

As outlined above, CAS warmly welcomes Ofcom's commitment to improving the affordability and resilience of connectivity to ensure consumers in Scotland can get online. We also warmly welcome, the proposed Media Literacy programme – and we would underline that consumer needs around digital literacy go beyond online safety, to include the skills, confidence and competencies required to access the increasingly digital world of essential public services. CAS very much welcomes Ofcom's initial investment in media / digital literacy skills, whilst underlining the need for much greater investment, from Ofcom and more widely, in digital skills support, to mitigate impacts on equalities, accessibility and inclusion as more essential services become digital. Many welfare benefits, utilities, financial services, health services, education, and work all increasingly dependent on reliable connectivity that many vulnerable communities do not have whether due to affordability, connectivity or skills and confidence. Therefore, CAS believes that a twin track approach is needed in terms of effective resourcing for consumer upskilling, whilst also protecting channel choice to ensure those unable to access digital services are not disadvantaged as a result.