

Communications Consumer Panel and ACOD's (CCP-ACOD/the Panel) response to Ofcom's Plan of Work for 2025/26

Background

The Communications Consumer Panel, established by the Communications Act 2003, is a group of independent experts with direct sectoral experience. We ensure the citizen and consumer voice is represented in communications policy development and we have dual membership with Ofcom's Advisory Committee for Older and Disabled People.

The Panel pays particular attention to underserved communities, people with access requirements, and people who may be more susceptible to harm, and the needs of micro businesses, which have many of the same problems as individual consumers.

We carry out research, provide advice, and encourage Ofcom, governments, industry and others to look at issues through the eyes of consumers, citizens and micro businesses.

Four members of the Panel also represent the interests of consumers in England, Northern Ireland, Scotland and Wales respectively. They liaise with the key stakeholders in each Nation to understand the perspectives of consumers in all parts of the UK and input these perspectives to the Panel's consideration of issues.

Our response

As the statutory consumer panel for the communications sector, we welcome the opportunity to input into Ofcom's policy work, both at an early stage in regular meetings with Ofcom teams ([click here to read our agendas and minutes](#)) and by responding to Ofcom's public consultations ([click here to read published consultation responses](#)) including this one on its Plan of Work 2025/26.

Putting the consumer at the heart of the communications sector and leaving no-one behind

We recognise that Ofcom works with 'industries in the communications sector that have technology at their heart'. We urge Ofcom to put the consumer at the heart of those industries, with no-one left behind - and to build this intent into Ofcom's work with communications providers and other industry players within its circle of influence.

We support Ofcom's outlined set of priorities and within each would set out some considerations to help put consumers at the heart of the communications sector and to work towards leaving no-one behind.

Internet and post we can rely on

Internet and post we can rely on - that we can *all* rely on - accords strongly with the work of the Panel. Communications services are, in our view, a basic human right. We believe that all consumers should have the right to access affordable, reliable, good quality internet, telephony and postal services, wherever they are in the UK.

Our role is therefore to highlight to Ofcom, industry and government, the potential for unintended consequences in their proposals, and of industry practices that perpetuate the underserving of certain groups of consumers, and to provide evidence of risks and impacts to consumers, with a spotlight on particular communities or circumstances. We view micro-businesses as consumers with additional needs, and we also scan the horizon for wider impacts affecting citizens, including recipients of post.

We have supported and input into Ofcom's work on fair and transparent contracts, easier switching, access to redress in this sector when things go wrong, and the monitoring of quality of service and of customer service. Additionally, we have worked with Ofcom, industry and stakeholders to provide a voice for consumers where changes in network provision may cause impacts that consumers were not aware of, such as the migration from analogue to digital telephony and the retirement of 2G and 3G networks. We have input advice built through engagement with a wide range of stakeholders, and listened to, and shared, the voice of consumers through robust, independent research.

We have been pleased that Ofcom has listened to our advice and insights, and we have seen changes implemented by Ofcom in the past year that provide consumers with fairer and more reliable services.

We will be responding to Ofcom's consultations on proposed changes to the Alternative Dispute Resolution regime and the regulation of postal services, to further this work. We share Ofcom's consultations with stakeholders to encourage them to provide a voice for the consumers they represent, and we urge Ofcom to stay firm on their proposals and not weaken their position due to industry objections.

We support innovation and growth within the communications sector. We believe that the protection and empowerment of consumers, and the innovation and growth of the market are not mutually exclusive matters. A flourishing communications sector is able to offer more choice and opportunity to consumers, citizens and micro-businesses. However, the ability for individual providers to decide to offer choice and opportunity is not the same as Ofcom being able to guarantee that all communications providers will provide choice and opportunity, to all of their customers. We believe this means that Ofcom's monitoring and compliance work continues to be vital, as does continued and consistent guiding of communications providers to foster a culture within their organisations of doing the right thing.

We will continue to support the good work that Ofcom does to meet its priorities but will also continue to provide Ofcom with informed advice, as a 'critical friend', to help it hone its focus and prevent potentially underserved consumers from becoming marginalised and excluded.

We value Ofcom's extensive research programme and its recent work looking at the experiences of underserved communities, which we provided input on at an early stage.

We regularly meet with Ofcom's research teams to understand their findings and conclusions and seek their input and that of our consumer-focused stakeholders when designing our own. Robust consumer research listening to a multitude of UK consumer voices is so important. We have advised Ofcom that more research into postal user needs would be useful before consulting on proposals to changes to the Universal Postal Service.

Our concerns are both for postal users reliant on receiving letters, such as hospital appointments and legal documents, on time, and those sending post, to keep postage prices affordable and post boxes available in locations and at times postal users need them. We would also draw attention to the specific needs and perspectives of consumers and businesses in Northern Ireland and in the Highlands and Islands. We understand that Ofcom has a difficult balance to strike in terms of maintaining a sustainable service, but we have long called for the same attention to fairness that is given by Ofcom to the telecoms sector to be given to the postal services sector.

Equally, in considering reliability in the postal services network, we have highlighted the needs of consumers across the UK using telephony and internet networks and the postal service, sharing widely our research into the experiences of remote and rural communities, which we have since followed up with research into urban communities and micro-businesses. We have subsequently commissioned a study into the impact on consumers across the UK of digital network outages, taking into account circumstances such as the recent winter storms.

Understanding and serving the needs of consumers across a range of circumstances help build trust, security, choice and confidence in the market, for everyone.

We work with communications providers in regular meetings of our Industry Forum and separately. We appreciate the initiatives that some have in place to empower and support consumers with varying needs, and the intention to do more. Communications providers have competing priorities, and we know that they need to invest their resources wisely. We believe that the level of support for all consumers who have additional needs must continue and evolve with the needs of the consumers in a fast-paced market.

The importance of raising awareness of the support that providers can offer - for example, to consumers in debt, consumers who require access to video or text relay, consumers who are not digitally confident, and consumers who are victims of scams - will be as important as ever, in 2025/26.

Additionally, collaboration between providers must continue, to share good industry practice in non-competitive situations, such as providing support to consumers more susceptible to harm (including telecare users amidst widescale telephony changes). We encourage Ofcom to continue to work with smaller providers which may be less well connected with the good practice sharing that we have witnessed between larger providers.

The move to a more self-service style of customer service, through directing consumers to use a communications provider's app, for example, may be a time-saving convenience to many consumers and prove cost-effective to providers, particularly those without large contact centre teams.

However, we believe that communications providers should be using equality impact assessments, getting to know their customer base and using universal design principles in the design of customer service solutions. An app should be accessible to people who cannot see a screen, so rely on a screen-reader and people who cannot use touchscreens - even then we advise communications providers to continue to maintain a level of 'traditional' customer service as less digitally confident consumers are less able or willing to download apps - or those who need to speak to a human to arrange a payment plan or downgrade their service.

We live a safer life online

Awareness of a wide range of consumer needs becomes ever-more important at a time where AI and other technology can be helpful to industry and consumers. Building out bias and using universal design principles in service and process design will be crucial to prevent communications services being served fairly to only 'the average consumer'.

The increase in awareness of the needs of people with neurodiversity has informed design positively for all consumers, as it is more cost-effective to build a website that is clear, uncluttered and easy to understand for all, from the outset, than it is to build two separate options, or to retrofit.

Ofcom has now commenced in earnest its battle for online safety - working with other regulators to build towards the aim that we live a safer life online. We applaud Ofcom's move to action without delay, supported by its communications campaign, announcing that now is the time for those who have become regulated entities under the Online Safety Act, to take action to prevent and address harm.

We have welcomed the opportunity to discuss with Ofcom teams their roadmap and projects working towards this aim, and we look to support this work within our own remit. While we recognise that Ofcom must prioritise its efforts within its regulatory remit and begin by focusing on the harm experienced by women and children, we are aware through our stakeholder network and Panel Members' lived experience that there are other communities at similar risk of harm, including LGBT+ users of online services. We encourage Ofcom to have all consumers in their peripheral vision while taking action to protect women and children, so that more people can live a safer life online, sooner.

Much of the Panel's work in the telecoms and postal services sectors will enable us to engage with living a safer life online - our research into the experience of consumers who have been scammed and no longer feel safe using the channel they were scammed through (telephone, online search engine, social media, post) made us aware of the shame and trauma people feel and this is similar to some of the experiences of people who have been harmed online. Our experience in looking into complaints procedures and Alternative Dispute Resolution gives us an awareness of consumer confidence issues around reporting

issues and our experience in listening to the needs of micro-businesses makes us aware of how difficult it is for smaller businesses to navigate the communications sector without the resources larger businesses can rely on.

We have also supported Ofcom's intention to work more closely with academics - we strongly support learning from studies that are already taking place to inform Ofcom's future-looking policies.

Enabling wireless in the UK economy

Online services and media can only be received by consumers if the right technology and networks are in place for all. We support Ofcom's intention of enabling wireless in the UK economy, which we know can make a positive difference to the lives of consumers, listening to the stories of consumers in remote and rural areas.

However, we would also raise the voice of those who will not benefit from wireless technology, or are currently left behind, digitally excluded - and as technology moves forward, we encourage Ofcom to remain mindful of the fact that there may always be a proportion of UK consumers who are unable to keep up with technological advance - unless, that is, technology is designed with them in mind.

The ageing population and the disabilities and long-term conditions that develop with age, mean that while enabling wireless in the UK economy might be beneficial on many fronts, consideration will need to be given to the interfaces through which wireless technology reaches consumers.

Digital inclusion is a moving target and Ofcom must remain focused on the changing needs and capabilities of consumers as well as working with government and industry to enable secure and reliable infrastructure. Improvements in connectivity are only positive if coupled with usability and if those improvements are affordable.

We have been encouraged by the recently increased consumer awareness of social tariffs and have also encouraged Ofcom to stay aware of the work of Good Things Foundation/University of Liverpool on the Minimum Digital Living Standard.

Media we trust and value

Our remit does not include broadcast and on-demand content but does include the access to content and under our ACOD remit, the representation of older and disabled people on broadcast and on demand content.

Our comments above, about the need for usable and accessible interfaces to prevent digital exclusion are relevant to Ofcom's broadcast and on-demand work. Ofcom's regulatory remit does not include the regulation of devices and we find this concerning. We encourage Ofcom to work with device manufacturers and content providers to promote digital inclusion.

As we have said previously in this response, we believe that communications services

should be considered a basic human right. Consumers should be able to access those services independently. We have met with Ofcom's teams looking at the regulation of voice assistants and digital terrestrial television and we believe that this could be a point in time where Ofcom could encourage the use of tech for good and prevent consumers in more vulnerable circumstances from being left behind. There is an opportunity for technology to support the daily lives of consumers, but it needs to be easy for everyone to use.

The move towards touchscreen mobile phones and tablets, and televisions that use complex menu interfaces and password protection is already excluding consumers. Consumers who also require subtitles, audio description or signing may be unable to access the increased provision that Ofcom and broadcasters have worked hard to provide, because they have to be able to navigate a complex consumer journey before they can personalise their experience.

We do, however welcome advances in the personalisation of broadcast and on-demand content and having previously worked with sensory loss charities to commission research into consumers' experiences of and needs around access to subtitles, audio description and signing, we welcome improvements, as well as to font and colour - and we have supported Ofcom's work in this.

Ofcom also has an important role in media literacy, and we are pleased that Ofcom engages with consumer organisations to inform its Making Sense of Media programme. We encourage Ofcom to continue investing time and resource in this, given the challenges to consumers of all ages of keeping pace with a fast-moving market.

Finally, we would ask Ofcom to reflect on whether it learns from its own successes and failures and promotes sharing of learning across its workstreams, particularly as its remit expands, to ensure that it is able to 'connect the dots' between programmes of work, prevent duplication and share analysis.