

Your response

Question	Your response
<p>Do you have any comments on our proposals?</p>	<p>Confidential? – Y / N</p> <p>Scotland’s Citizens Advice Network is an essential community service that empowers people 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.</p> <p><u>General</u></p> <p>Citizens Advice Scotland welcomes the opportunity to respond to Ofcom’s proposed plan of work for 2022/23.</p> <p>Citizens Advice Scotland welcomes Ofcom’s recognition that accessible and robust communication networks are essential to the livelihoods of consumers.</p> <p>Overall, CAS are pleased with the focus of the major themes and priorities set out throughout Ofcom’s proposed plan of work. CAS notes that clients of the Scottish Citizens Advice Network have been reliant on accessible and strong communication services throughout the pandemic, and we welcome Ofcom’s plans to ensure that these services are improved and developed. We especially welcome Ofcom’s recognition of the need for affordable communication services. In light of the price rises throughout the regulated markets and the subsequent pressure on household incomes, CAS believes that affordable communication services are vital, especially for our vulnerable consumers.</p> <p>Communication services, whether postal or digital, are an important part of keeping our communities and workplaces connected and in ensuring citizens have equal access to services.</p>

While we note the continued move towards digital communication, we continue to urge that consumers should be able to exercise channel choice in how they receive information from providers and operators and how they access service. This is vital in ensuring that no one is left behind.

CAS wishes to see effective competition across communications markets. We consider that it is important that competition delivers for all consumers. In order for this to happen, there must be competition across all price points, and across all geographic areas. In this regard, it is important that rural consumers should also be able, for example, to choose from a range of mobile and broadband providers with reliable coverage in their area and to choose from a range of parcel operators in the postal market.

Post

As Ofcom notes, the postal market has changed considerably since the beginning of the COVID-19 pandemic and online shopping has been an important lifeline for consumers who were maintaining social distancing guidelines or shielding at home. Our comments on this workplan take account of these changes in the postal market and evolving consumer needs. Overall, we agree with Ofcom's chosen areas of focus on postal services in 2022/23, including ongoing monitoring of the USO, continuing work on postal regulation, work on safeguards caps which will address affordability issues, and consideration of how to provide support for vulnerable consumers.

We note that monitoring the designated universal service provider's performance continues to be a priority for Ofcom. We agree that this is an important issue for postal consumers. As part of this work, we encourage Ofcom to consider measures to ensure Royal Mail meets quality of service targets as required in the USO. Although the COVID-19 emergency period ended on 31 August 2021, Royal Mail's quality of service has not yet recovered. While the pandemic continues to

present a challenge in meeting delivery targets, we know these delays are having serious impacts on consumers as they miss out on crucial post, for example documents from the NHS, financial services, and government agencies.

The workplan for 2022/23 includes continuing work on the postal regulation review and CAS will continue to contribute to this process in 2021/22.

In relation to Ofcom's theme of fairness, CAS is encouraged to see that Ofcom is prioritising work on affordability of communication services and support for vulnerable consumers. We have long advocated for consumers to have access to more affordable postal services that meet the needs of vulnerable consumers. While we were pleased to see recent changes in relation to redirections for consumers in receipt of benefits, we believe more remains to be done on affordability issues.

The proposed changes to guidance for parcel operators, requiring them to better respond to disabled consumers' needs is a positive step towards ensuring that postal services are accessible for all consumers. When considering how to improve outcomes for vulnerable consumers, we would urge Ofcom to embrace a wide definition of vulnerability. Vulnerability can take many forms; it can be transient, fluctuating, or permanent. It is important that regulatory regimes protect consumers who may be vulnerable in different ways or due to different circumstances.

CAS welcomes Ofcom's signal that it will introduce new guidance for parcel operators on complaints. CAS considers that being able to access redress when things go wrong is a basic component of a fair regulatory regime which can offer effective consumer protection.

Telecoms

CAS welcomes Ofcom's commitment to monitor the migration to Voice Over Internet Protocol (VoIP). CAS agree with Ofcom that

this technology can have significant benefits for consumers. However, we also recognise the need for consumers to be protected from detriment during the migration. We therefore welcome Ofcom's programme of work relating to VoIP and the proposed monitoring of industry to ensure consumers are protected from harm or undue disruption. CAS continues to have concerns that consumers may be exposed to harm if their existing homecare products are incompatible with VOIP or in the event of long-lasting power outages, such as happened during Storm Arwen.

CAS supports Ofcom's efforts to ensure communications consumers are protected from harm, treated fairly and are able to get the best deal that suits their needs.

We strongly welcome Ofcom's plans to implement switching reforms, with the "One Touch Switch" service for all residential landline and broadband consumers. CAS believes that such a service is necessary to ensure effective competition between providers and will offer greater choice and agency for consumers.

CAS is pleased to see Ofcom's commitment to monitoring customer engagement by providers. We expect new provisions around end-of-contract notifications (ECNs) and annual best tariff notifications (ABTNs) to benefit consumers. CAS believes that such measures would significantly help consumers over the course of the next financial year, and we welcome Ofcom's plan to review the impact and effectiveness of these measures.


CAS also welcomes progress in getting all parts of the UK connected, and in improving the speed and reliability of internet and mobile connections. However, CAS is of the view that many consumers may not understand what packages are available and which will meet their requirements best. Providers may use different terms to describe speeds and consumers may not know what service they need to undertake their everyday activities, whether these be emails, streaming or online meetings. With the advent of gigabit ready

services, consumers may need more support to understand what services are best for them and to prevent mis-selling.

We support Ofcom's commitment to tackling nuisance calls and scams. The Scottish Citizens Advice Network often deliver advice to clients who have been the victims of scams originating from texts, calls or emails. We welcome Ofcom's plans to raise awareness and improve information to help people more easily spot and deal with spam calls and texts. However, we would encourage Ofcom to consider the need for raising consumer awareness of scams that originate over emails, such as phishing.

CAS is supportive of Ofcom's plans to monitor and report on affordability issues and specifically on the availability, promotion and take-up of targeted tariffs designed for customers on low incomes. CAS would welcome further work perhaps in the form of a communications campaign, to raise awareness of targeted/social tariffs. With the expected price rises in the telecoms market coinciding with the significant price rises in the energy sector consumers and more widespread increases in cost of living consumers could be facing significant financial vulnerability. Having access to affordable internet access is essential to ensuring that consumers remain connected, particularly consumers who rely on internet enabled services to work from home or maintain their Universal Credit journals. CAS believes many consumers who would benefit from targeted tariffs in these circumstances may not be aware of their existence.

Furthermore, CAS would highlight the significant lack of choice consumers have in the mobile market in relation to targeted or social tariffs as, currently, no mobile provider offers a targeted or social tariff. As mobile phone usage continues to increase, some consumers now use their mobile as their primary device to access the internet. With the upcoming price rises across the regulated sectors, many mobile consumers could face financial vulnerability while simultaneously

	<p>having no access to a targeted social tariff in the mobile market.</p>
	<p>CAS strongly supports Ofcom's plans to ensure that providers treat their customers fairly and deliver services and products in line with the fairness commitments. Finally, CAS welcomes Ofcom's continuation of the monitoring of outcomes and promoting effective compliance.</p>

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