



To: Telecomsadvocacy@culture.gov.uk

Which? response to Department for Digital, Culture, Media and Sport consultation on reforming consumer advocacy in telecoms

Consumers are increasingly reliant on being connected as more and more everyday tasks such as banking and shopping, as well as watching TV and films, are performed online. It is therefore essential that consumers have reliable telecoms services.

- Which? welcomes the steps being taken to ensure a well-funded and well-resourced consumer advocate. This is essential given the importance of telecoms to consumers.
- We do not have a strong view on which of the three options the DCMS should choose. However, the role and functions of the Communications Consumer Panel (CCP) should be carefully reviewed prior to any reforms to consumer advocacy.

In our response to the Department for Business, Energy and Industry's consultation on modernising consumer markets Green Paper¹ of July 2018 we said:

"Consumer advocacy arrangements in the telecommunications sector need to be sufficiently flexible so that resources are focused on the key areas of consumer harm, though we agree that a stronger consumer voice could potentially make a significant difference to consumer outcomes."

"Before introducing changes to the current landscape, the effectiveness of current arrangements should be reviewed including the work of the Communications Consumer Panel (CCP). Furthermore, given the technological changes in this sector and links to digital markets, consumer advocacy arrangements must have the necessary flexibility to ensure the resources can be prioritised effectively on the key areas affecting consumers."²

We remain of the view that the role and functions of the CCP should be carefully reviewed prior to any reforms to consumer advocacy. In the case of adopting either 'Option 1' or 'Option 3' as presented in the consultation, it would be important to ensure that there is no duplication in terms of the remit of the new body or the powers given to Citizens Advice.

Whilst we do not have a strong view on which of the three options the DCMS should proceed with, we want to emphasise the need for a well-funded and well-resourced consumer advocate, given the importance of telecoms to consumers. Consumers are increasingly reliant on being connected 'on the go,' 79% of UK adults personally use a smartphone³ and users spend 68% of their total time online on their smartphone, up from 44% in 2015.⁴ As the consultation details, by comparison to other industries, telecoms receives much lower levels of spend on advocacy despite one of the higher weekly average expenditures.

¹ <https://www.gov.uk/government/consultations/consumer-green-paper-modernising-consumer-markets>

² <https://www.which.co.uk/policy/consumers>

³ https://www.ofcom.org.uk/_data/assets/pdf_file/0028/155278/communications-market-report-2019.pdf

⁴ https://www.ofcom.org.uk/_data/assets/pdf_file/0024/149253/online-nation-summary.pdf

In particular, we believe that a strong consumer advocate can help to strengthen the consumer voice in this market and address the key areas of consumer harm. For example, our own work has shown the importance of improving trust in the telecoms sector. Our trust tracker shows that there are relatively low levels of trust in telecoms: broadband trust 40%/distrust 22%, mobile phone services trust 37%/distrust 23%⁵ (June 2019). This is lower than day-to-day banking (45% trust) and water (58% trust) and only just above that of gas and electricity (35% trust).

Like other respondents to the Green Paper we supported the proposals to provide direct support and advice to consumers, particularly the most vulnerable. Whatever form the new consumer advocate body takes it is essential that it works closely with Ofcom to help address unfair practices and also learns from other sectors about the most effective ways to engage and support consumers.

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⁵ <https://consumerinsight.which.co.uk/tracker/trust>