

Reference: 01522155

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Freedom of Information request: Right to know request

Thank you for your request for information concerning the advice issued by the Communications Consumer Panel and Advisory Committee for Older and Disabled People. Your request was received on 21 October 2022 and we have considered it under the Freedom of Information Act 2000.

Background

By way of background, the Communications Consumer Panel and Advisory Committee for Older and Disabled People ('the CCP') is a group of independent experts approved by the Secretary of State, responsible for ensuring the citizen and consumer voice is represented in communications consumer policy development.

The CCP acts as a statutory consumer panel and performs the role of a 'critical friend' to Ofcom, to help make the sector work for consumers, citizens and micro-businesses, particularly people who may have additional access requirements to access communications services. They represent the interests of consumers in England, Northern Ireland, Scotland and Wales. The CCP meets monthly excluding August, with Ofcom and external organisations and regularly inputs into Ofcom's policy development before it is publicly announced. In each session with Ofcom's policy teams, the CCP raises any concerns about equality of access for all consumers and/or citizens and micro-businesses. Minutes of the CCP's meetings are published on its website: [Communications Consumer Panel meetings](#). The CCP also responds to Ofcom's policy consultations and provides input on behalf of consumers with additional access requirements, as well as encouraging consumer representative organisations across the UK to do the same. Consultation responses are published on the CCP's website: [Consultation responses - Communications Consumer Panel](#).

In addition, the CCP holds meetings with stakeholders across the UK – meetings may be held in person, virtually or in a hybrid format (with some attendees in person and others joining online). In doing so, the CCP is mindful of the access requirements of all participants and provides adjustments as requested.

The CCP listens to the needs of people and organisations it works with and aims to make it possible for everyone to participate equally. The CCP holds quarterly 'Hubs' around the UK which are accessible meetings for consumer representatives including organisations that represent disabled consumers and consumers who are less able to use the internet. A summary of the insights received

by the CCP during those meetings is shared with Ofcom and others who can make a difference to consumers. Examples are found on the CCP's website: [National Stakeholder Hubs - Communications Consumer Panel](#).

The CCP also commissions independent research and when evaluating agencies' bids for each project they check that the appointed agency is inclusive in both the recruitment stage and when interviewing. The CCP publishes its research on its website and also shares the research with organisations representing consumers across the UK so that they can use the insights and evidence to support their own work: [Research and reports - Communications Consumer Panel](#). Recent projects have included listening to the needs of consumers who rely on access to a landline phone, the communications service needs of people living in care homes and consumers' ability to access the communications channels they need.

The CCP also meets regularly with communications providers and alternative dispute resolution ('ADR') providers, sharing good practice from other sectors to help them to make their processes and services more inclusive.

Your request & our response

Please disclose what advice CCP/ACOD have given in respect of:

1. 'Reasonable adjustments' under s 20 of the Equality Act 2010 and/or similar requirements eg Communications Act.

Last year the CCP commissioned Graeme K Whippy MBE to write a think piece on Making Communications Services More Inclusive, which has been shared with Ofcom, DCMS, communications providers, ADR providers and consumer representatives. The think piece is published [here](#). The think piece includes advice on service providers' duty to make reasonable adjustments.

2. The anticipatory requirement of 'reasonable adjustments.'

Please see above.

3. 'Non- digital' alternatives for disabled people who cannot use the internet or use it well.

The CCP notes that Ofcom welcomes contact by letter or telephone as well as via electronic means and that they offer video relay for deaf BSL users. The CCP has also encouraged Ofcom to make its policy consultations easy for consumers and their representatives to respond to, for example, its consultation on emergency video relay for BSL users, which included a video in BSL and a variety of ways to respond.

The CCP provided advice to Ofcom on its [guide to treating vulnerable customers fairly](#), which refers to the need for regulated providers to have different communication channels (as required by C5.3(b) of the [General Conditions of Entitlement](#)). Please see the CCP's advice on the guide [here](#).

In addition, the think piece referred to above relates to Making Communications Services More Inclusive, and includes advice on accessibility for service users. The think piece is published [here](#).

4. Accessible formats reflecting modern communication needs and diverse disabilities [ie beyond the old stereotypes of Braille, large print etc for the deaf and blind etc].

The CCP provides documents in accessible formats on request, as described above. Two members of the CCP are disability consultants in their own right and other members engage widely with a range

of consumer representatives including charities that represent people who have a range of accessibility and communications needs. Please see above.

5. 'Assisted Digital' and one to one support.

As highlighted above, the CCP takes 'assisted digital' or digital inclusion very seriously and regularly meets with organisations such as the Good Things Foundation to understand what communications providers can do better. The CCP also commissions research that includes people who are less digitally confident. As well as the research projects referred to above, the CCP recently commissioned research that looked into the challenges faced by people who had to use some form of digital service for the first time during the pandemic. The CCP's research and recommendations can be found [here](#).

6. Using proxies/third parties.

The CCP has found from its research over a number of years that some consumers find using proxies/third parties useful and encourages communications providers to support consumers who find it easier to contact them through a trusted proxy and to make the process easy to sign up to, not just through digital means. As the CCP often provides advice on this topic verbally in meetings, we do not hold copies of this data.

7. Specific contacts for disabled people and staff training.

As the CCP is a small group of experts supported by a small executive team, it does not have specific contacts for disabled people and staff training. However, it has encouraged communications providers to have a dedicated team that can assist consumers who have additional access requirements, as it has found that some consumers who have taken part in its independent research would find this useful.

The CCP meets with communications providers to share good practice from other sectors on providing inclusive access to their services, with the aim of encouraging them to meet and exceed their regulatory requirements.

8. The Public Sector Equality Duty.

As a public body, Ofcom is subject to the public sector equality duty under the Equality Act 2010. Ofcom is required to assess the potential impact of all its functions, policies, projects and practices on the following equality groups: age, disability, gender, gender reassignment, pregnancy and maternity, race, religion or belief and sexual orientation, and, in Northern Ireland, political opinion and dependents. We fulfil these obligations by carrying out Equality Impact Assessments ('EIAs'), which examine the impact our policy is likely to have on people, depending on their personal circumstances. EIAs also assist us in making sure that we are meeting our principal duty of furthering the interests of citizens and consumers, regardless of their background and identity.

The CCP is able to refer Ofcom to its responsibilities under the Public Sector Equality Duty and encourage it to undertake comprehensive equality assessments should this be necessary. As the CCP often provides advice on this topic verbally in meetings with Ofcom, we do not hold copies of this data.

If you have any further queries, then please send them to information.requests@ofcom.org.uk quoting the reference number above in any future communications.

Yours sincerely

Zach Westbrook

If you are unhappy with the response you have received in relation to your request for information and/or consider that your request was refused without a reason valid under the law, you may ask for an internal review. If you ask us for an internal review of our decision, it will be subject to an independent review within Ofcom.

The following outcomes are possible:

- the original decision is upheld; or
- the original decision is reversed or modified.

Timing

If you wish to exercise your right to an internal review **you should contact us within two months of the date of this letter**. There is no statutory deadline for responding to internal reviews and it will depend upon the complexity of the case. However, we aim to conclude all such reviews within 20 working days, and up to 40 working days in exceptional cases. We will keep you informed of the progress of any such review. If you wish to request an internal review, you should contact information.requests@ofcom.org.uk

If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision. Further information about this, and the internal review process can be found on the Information Commissioner's Office [here](#). Alternatively, the Information Commissioner can be contacted at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF