Your response

Question	Your response

Question 1: Do you agree with the proposed revisions to our guide? Please provide your views with supporting evidence.	*Is this response confidential? – N*
	
	We welcome this consultation from Ofcom, which is particularly timely given rising inflation and economic uncertainty. Reflecting our mission to fix the digital divide - and as a leading digital inclusion charity - we are keen to work with Ofcom, providers and others to help end data poverty. Our response to the proposal is formed by two points:
	
	1. **Further clarification is needed on the role of charities and community organisations in promoting social tariffs;**
	
	2. **Building a framework which understands that low or limited internet access, digital skills and confidence can contribute to a consumer's 'vulnerability'.**
	
	<u>Response</u>
	
	1. **Further clarification is needed on the role of charities and community organisations in promoting social tariffs.**
	
	    1.1. Good Things Foundation works with a network of over 2,000 community organisations and charities across the UK. Most support people who will be significantly impacted by the cost-of-living crisis.
	
	    1.2. Not all of these organisations are FCA regulated and, though they may provide general cost-saving advice, they may not be confident about what guidance they can provide to people about social tariffs - given also the variation between the tariffs offered by different providers.
	
	    1.3. Broadband social tariffs – and other more affordable internet deals – are part of a complex market. This is difficult to navigate both for consumers and organisations providing advice to consumers.
	
	    1.4. We welcome the strengthened emphasis on social tariffs, but greater clarity and guidance is needed from Ofcom so that charities and other community organisations can be confident in promoting broadband social tariffs and other low cost tariffs.
	
	    1.5. This guidance for charities about promoting solutions should also extend to other solutions which do not meet the definition of a 'social tariff' such as TalkTalk's fixed-line package available through the Department for Work and Pensions; and effective mobile solutions to data poverty. These include VOXI's 'For Now' service and Good Things Foundation's National Databank which provides free mobile data connectivity to people who need it, operating through community partners in our network on a trust based model.

1.6. Through our Data Poverty Lab, we have worked with people with lived experience of poverty to develop a framework to assess data poverty solutions - CHESS. We believe this tool could be useful to Ofcom in driving awareness of other solutions to data poverty beyond social tariffs.

1.7. Good Things Foundation is keen to support the promotion of available packages and other solutions which can reduce data poverty. We are currently developing a practical guide for community partners, and would welcome the opportunity to work with Ofcom to review and disseminate this.

2. Building a framework which understands that low or limited internet access, digital skills and confidence can contribute to a consumer's 'vulnerability'

2.1. It is easy to assume that all consumers have relatively high levels of digital literacy, and that those who are online are comfortable and confident being online. Some companies can also assume that consumers have consistent access to the internet.

2.2. These assumptions would be ill-founded, as ten million people cannot get online independently (Lloyds Bank, 2021). Meanwhile, Ofcom (2022) shows two million households struggle to afford their internet bills – a figure that is almost certain to increase as inflation increases. We have also identified (Stone, Llewellyn and Chambers, 2020) that fear of online harms has a significant impact on people's confidence, particularly when dealing with finances or personal data, increasing people's feeling of 'vulnerability.'

2.3. Importantly, whilst Ofcom's current guide recognises that some people do not use the internet, it does not recognise that low or limited digital skills and confidence can contribute to a consumer's 'vulnerability'. Ofcom's own data analysis highlights the intersectionality between digital exclusion, limited use and demographic characteristics associated with 'vulnerability'.

2.4. Building on this, Ofcom can play a stronger role in requiring providers to take extra steps to recognise and address how these factors (no or limited access, and also digital skills and confidence) can contribute to and exacerbate 'vulnerability,' ensuring their systems and practices are designed to support everyone – including those whose vulnerability is compounded by limited internet access, digital skills, and confidence.

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About Good Things Foundation

Good Things Foundation is the UK's leading digital inclusion charity. We bring together the digital inclusion network, a network of over 2,000 community partners across the UK, working together to reach those who need support. We are responding to this consultation as a charity which is advocating for an end to data

poverty, and also in our role delivering the National Databank.

Through this network, we've supported more than three million people to gain digital skills since 2010 via our online learning platform, Learn My Way; distributed over 20,000 devices with data connectivity since April 2020, and have set up the UK's first National Databank which, thanks to donations from industry partners, will provide free mobile data connectivity for up to 500,000 people in need.

Our network partners are all independent of Good Things Foundation. Our partners include Citizens Advice bureaus, Age UK centres, small community centres, libraries, local charities supporting people with disabilities or unemployment, homeless shelters, job clubs et al. We call it a 'big club with a shared vision' - a vision of a world where everyone can benefit from digital.

Good Things Foundation works alongside funding partners including Virgin Media O2, J.P. Morgan and Google.org. Our projects have been supported by several Government departments, including HMRC and the Department for Levelling Up, Housing and Communities.