

## Your response

Question	Your response
<p><b>Question 1: Do you agree with the proposed revisions to our guide? Please provide your views with supporting evidence.</b></p>	<p><i>Is this response confidential?</i> <i>Highlighted sections are confidential</i></p> <p>Three UK supports Ofcom’s review of the guide, and shares comments on some suggested changes, notably where debt advice organisations represent their clients, and the suggestion that providers should consider offering social tariffs.</p> <p>Three UK agrees that providers should identify, engage and communicate with customers in debt or struggling to pay. Indeed Three UK already uses a variety of methods to contact customers ( email, SMS, letter and outbound dialling). Customers can use these methods, as well as webchat, which can be particularly beneficial, for example, for certain customers suffering with anxiety. Advisors are trained to identify and engage with customers who are struggling to pay and will talk customers through different payment options to help them manage their payments.</p> <p>Three UK also promotes organisations and charities that can provide free debt advice and support to customers in communications with customers and on the website, we recognise this is a useful support for customers in debt. We also monitor trends and opportunities to enhance the customer journey and customer options that we offer.</p> <p>With regards to making it as easy as possible for free debt advice organisations to represent their clients, we agree this needs to be subject to reasonable verification and consent procedures, as well as comply with data privacy requirements. Indeed <b>[REDACTED]</b>. We consider this process to be straightforward and fair and do not consider further changes could be made given that customer consent must be provided and documented.</p>

Three supports Ofcom's proposals to add to the guide that providers should avoid or limit the use of service restrictions where possible, use debt collection companies that have strong policies and ensure customers can easily find out what measures to expect. With regards to providers being "transparent about their approach, ensuring customers can easily find out which measures the provider tends to use and at what stages of the debt journey they can be expected" (paragraph 4.54), we suggest that Ofcom recognise that it would not be appropriate to publicise the complete details, but that customers can easily contact providers to receive this information. By making contact with us, customers can receive individual support and information on the steps and measures that can be taken. If the complete details were published, vulnerable customers might not benefit from the individualised support they receive, and there would be a risk that some customers that are not vulnerable take inappropriate advantage of the measures in place to support those that do need it.

Three UK recognises the importance of offering different payment measures to support customers who are in debt or struggling to pay and we offer payment deferrals or payment plans as appropriate, to provide the right outcome for the customer.

Finally, Three UK notes Ofcom's proposals to make it clear that offering a social tariff represents an important tool to support vulnerable customers (although this is not a requirement). In our view, [REDACTED]. In addition, initiatives already required by Ofcom and put in place by industry are also helping serve all customers to get the most value from their plans, for example, EOCN serves as a regular and timely reminder to customers to seek renewal and review switching options, so that they can secure a plan that best suits their needs (including their financial position).

THREE UK RESOPNSE - 12 MAY 2022

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Please complete this form in full and return to [debt.review@ofcom.org.uk](mailto:debt.review@ofcom.org.uk).