

## Your response

| Question   | Your response  |
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| <p><b>Question 1: Do you agree with the areas we are planning to cover as part of this review? Are there additional areas we should take into account?</b></p>                         | <p>Confidential? – Y / (N)</p> <p>The Consumer Council agree with the areas Ofcom plan to cover in this review. We are encouraged that consumer access and experiences of ADR are at the heart of the review.</p> <p>We note that Ofcom plan to gather consumer evidence through both qualitative research study and a review of a sample of cases to assess the effectiveness, fairness and consistency of decision-making within and between schemes. We would recommend that this process includes regional representation to ensure that consumer insights reflect the lived experience across the UK and regional variations are picked up and considered.</p> <p>In addition, we would recommend that particular attention is paid to consumers in vulnerable groups including low income, disabled or chronically sick, pensionable age and rural consumers to understand their experiences of ADR. Our recent research into ‘NI consumer and online detriment’<sup>1</sup> found that many of our most vulnerable groups have lower digital literacy, online confidence, and find it difficult to access online services. It will be important to understand the ADR experiences of these groups to ensure future recommendations address their needs.</p> |
| <p><b>Question 2: Do you have any comments on the issues raised in relation to these areas? Please provide any supporting evidence that you think we should take into account.</b></p> | <p>Confidential? – Y / (N)</p> <p>It is unclear whether ADR and the Ofcom review includes consumers who avail of pay as you go mobile services. In January 2023 the Consumer Council for Northern Ireland embarked on a research project entitled ‘Mobile roaming experiences of Northern Ireland Consumers’<sup>2</sup>. This research told us that 99% of Northern Ireland consumers use a mobile phone with 77% having a monthly contract and 22% using pay as you go. Due to the high proportion of pay as you go mobile users in Northern Ireland it is important to understand how ADR relates to these consumers and what their current experiences are.</p>  |

<sup>1</sup> [Northern Ireland Consumers and Online Detriment](#) – December 2023

<sup>2</sup> [Mobile roaming experiences of Northern Ireland Consumers](#) – July 2023

| Question   | Your response   |
|--|---|
|  | In relation to the time period of 8 weeks before consumers can access ADR we agree with Ofcom's proposal to reduce the amount of time a consumer has to wait before submitting a case. In the current cost of living environment where consumers are under considerable financial pressure, all efforts should be made to improve ADR timeframes and reduce consumer detriment. |
| <p><b>Question 3: Do you consider there are additional sources of information we should consider when undertaking our assessment of these areas?</b></p> | <p>Confidential? – Y / <input checked="" type="radio"/> N</p> <p>The Consumer Council does not have any input to this question.</p>   |

**\*Please note Consumer Council full response letter including links to supporting research evidence detailed below.**

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

ADR Review Team, Network and Communications  
Ofcom  
Riverside House  
2A Southwark Bridge Road  
London SE1 9HA

5 January 2024

Dear ADR Review team,

**Review of ADR in the telecoms sector – Consumer Council for Northern Ireland response**

The Consumer Council for Northern Ireland (Consumer Council) was established in April 1985 as a non-departmental public body (NDPB) under the General Consumer Council (Northern Ireland) Order 19841 (The Order).

We are Northern Ireland's statutory consumer representative body and our principal statutory duty is to safeguard their interests. We operate under our sponsor department, the Department for the Economy (DfE), on behalf of the Northern Ireland Executive.

We are an insight-led evidence-based organisation:

- Providing consumers with expert advice and confidential guidance.
- Engaging with government, regulators and consumer bodies to influence public policy.

- Empowering consumers with the information and tools to build confidence and knowledge.
- Investigating and resolving consumer complaints under statutory and non-statutory functions.
- Undertaking best practice research to identify and quantify emerging risks to consumers.
- Campaigning for market reform as an advocate for consumer choice and protection.

Our statutory powers cover consumer affairs, energy, transport, water and sewerage, postal services and food affordability and accessibility. These legal responsibilities are drawn from legislation, licences given to companies working in Northern Ireland, and cooperation agreements set in memorandums of understanding.

our non-statutory functions allow us to educate, empower and support consumers against discriminatory practices in any market through advocacy work, as well as education and outreach programmes covering a broad range of topics including consumer rights, safer finances and a more sustainable energy future.

In everything we do, we prioritise consumers:

- who are disabled or chronically sick;
- who are of pensionable age;
- who are on low incomes; and
- who live in rural areas.

While we have no statutory remit in the area of telecoms, the Consumer Council welcomes the opportunity to respond to the Ofcom Review of ADR in the telecoms sector.

Recent research projects by the Consumer Council found that 99% of NI consumers used a mobile phone and 95% NI consumers have access to the internet therefore it is imperative that any review of ADR enhances protections for consumers in an increasingly digital age.

### **Call for input: key questions**

#### **1: Do you agree with the areas we are planning to cover as part of this review? Are there additional areas we should take into account?**

The Consumer Council agree with the areas Ofcom plan to cover in this review. We are encouraged that consumer access and experiences of ADR are at the heart of the review.

We note that Ofcom plan to gather consumer evidence through both qualitative research study and a review of a sample of cases to assess the effectiveness, fairness and consistency of decision-making within and between schemes. We would recommend that this process includes regional representation to ensure that consumer insights reflect the lived experience across the UK and regional variations are picked up and considered.

In addition, we would recommend that particular attention is paid to consumers in vulnerable groups including low income, disabled or chronically sick, pensionable age and rural consumers to understand their experiences of ADR. Our recent research into 'NI consumer and online detriment'<sup>3</sup> found that many of our most vulnerable groups have lower digital literacy, online confidence, and

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<sup>3</sup> [Northern Ireland Consumers and Online Detriment](#) – December 2023

find it difficult to access online services. It will be important to understand the ADR experiences of these groups to ensure future recommendations address their needs.

**2: Do you have any comments on the issues raised in relation to these areas? Please provide any supporting evidence that you think we should take into account.**

It is unclear whether ADR and the Ofcom review includes consumers who avail of pay as you go mobile services. In January 2023 the Consumer Council for Northern Ireland embarked on a research project entitled 'Mobile roaming experiences of Northern Ireland Consumers'<sup>4</sup>. This research told us that 99% of Northern Ireland consumers use a mobile phone with 77% having a monthly contract and 22% using pay as you go. Due to the high proportion of pay as you go mobile users in Northern Ireland it is important to understand how ADR relates to these consumers and what their current experiences are.

In relation to the time period of 8 weeks before consumers can access ADR we agree with Ofcom's proposal to reduce the amount of time a consumer has to wait before submitting a case. In the current cost of living environment where consumers are under considerable financial pressure, all efforts should be made to improve ADR timeframes and reduce consumer detriment.

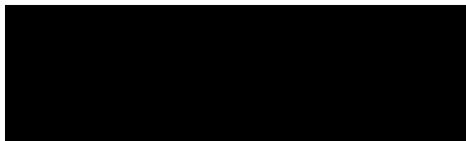
**3: Do you consider there are additional sources of information we should consider when undertaking our assessment of these areas?**

The Consumer Council does not have any input to this question.

Overall the Consumer Council welcomes this review and look forward to working with Ofcom in the future.

If you need any further information, please let me know.

Yours sincerely



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<sup>4</sup> [Mobile roaming experiences of Northern Ireland Consumers](#) – July 2023