

CONSUMER SCOTLAND RESPONSE TO OFCOM CONSULTATION ON 2024-25 DRAFT WORK PLAN

Thank you for the opportunity to respond to Ofcom's 2024-25 Draft Work Plan.

I have set out in this letter Consumer Scotland's feedback on the Draft Plan, which I will hope will be of value to you as you finalise your activities for the coming year.

Consumer Scotland has valued our engagement with Ofcom during the past year. In particular, we have been pleased to work with Ofcom in relation to the universal postal service and the switch to voice-over-internet protocol. We have also valued our regular engagement this year in the process of Ofcom's review of inflation-linked price rises in mobile, broadband, and pay TV contracts. We look forward to continuing and building upon this positive relationship during 2024-25. As the secretariat for the Consumer Network for Scotland, we appreciate the input to the Network provided by Ofcom representatives. This includes providing expert input, and speakers to help increase understanding amongst consumer bodies in Scotland of regulatory changes within the online consumer protection landscape, as well as hosting a number of Network meetings.

We welcome Ofcom's plan to continue with a focus on increased digital connectivity as well as media literacy in Scotland, due to the challenges experienced by consumers living and working in remote, rural and island communities. We also welcome Ofcom's plan for continued stakeholder engagement regarding the implementation of the online safety regime in Scotland, recognising initiatives taken to protect consumers within a devolved context.

Consumer Scotland recently published our own Draft Work Programme for 2024-25. In this Programme we set out our planned work for the year across our three strategic objectives:

- Cost of living and affordability
- Consumers in vulnerable circumstances
- Climate change adaptation and mitigation

Our proposed workstreams include research, analysis, policy and advocacy activity, alongside our work on the Consumer Duty for public bodies in Scotland, the system for recall of goods and the development of our investigations function. We receive levy funding for our work in the gas, electricity, post and water sectors and we also undertake work across the wider consumer economy.

As the consumer advocacy organisation for postal services in Scotland, we are particularly keen to continue our close engagement with Ofcom during the next year in relation to the work being planned in this market.

Ofcom's recent publication on the future of the universal postal service is a significant milestone. We will continue to work closely with Ofcom, government, and other consumer and civil society groups during 2024-25 to ensure that the consumer interest is well-evidenced and recognised within the process for considering any future change to the postal system. It is important that any changes are in the best interests of consumers and that any potential negative impact on consumers in Scotland, particularly those in vulnerable circumstances, are minimised.

We will also continue to engage with Ofcom in relation to its work to monitor the postal market and Royal Mail's performance. The failure of Royal Mail to meet its Quality of Service targets over the

last few years has negatively impacted consumers, we look forward to working with Ofcom on ensuring that consumers receive the standard of postal service that they should expect.

More broadly, looking across Ofcom's Draft Work Plan for 2024-25, we would encourage Ofcom to consider the users of postal services with no fixed address. There are several groups of consumers and communities who may face adverse outcomes due to a lack of a solution for receiving letters, for example those experiencing homelessness, fleeing domestic abuse, or those from the Gypsy, Roma and Traveller communities. We would encourage Ofcom to consider what role it can play in helping to improve how the postal system works across the UK for these consumers, taking account of any relevant policy variations in different jurisdictions.

In our wider role as the statutory consumer advocacy body in Scotland, we are keen to engage with Ofcom on its proposed work in 2024-25 in the following areas:

- Continued work to develop measures to protect consumers during the transition to digital voice calls, and in particular, measures to define consumer vulnerability in this context.
- Measures to ensure that the telecoms market remains affordable for all consumers and that social tariffs are able to be accessed by those in most need of them.

Additionally, we would also encourage Ofcom to maintain a continued focus on digital literacy and digital exclusion. Consumers who struggle to access digital services may also find it harder to access a range of other services, given that internet access can act as a gateway to these. Digital services can also help to facilitate competition, allowing consumers to access information about their options, and to shop around for the best deals for their needs.

I hope these comments are helpful and we look forward to continuing to work with Ofcom during 2024-25.