

Response to DCMS

Open consultation

Reforming Consumer Advocacy in Telecoms

On behalf of the UK Computing Research Committee, UKCRC.

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The UK CRC is an Expert Panel of all three UK Professional Bodies in Computing: the British Computer Society (BCS), the Institution of Engineering and Technology (IET), and the Council of Professors and Heads of Computing (CPHC). It was formed in November 2000 as a policy committee for computing research in the UK. Members of UKCRC are leading researchers who each have an established international reputation in computing. Our response thus covers UK research in computing, which is internationally strong and vigorous, and a major national asset. This response has been prepared after a widespread consultation amongst the membership of UKCRC and, as such, is an independent response on behalf of UKCRC and does not necessarily reflect the official opinion or position of the BCS or the IET.

Response

Q1a - Do you agree with the proposed remit and activities of the new telecoms advocate, as described above?

[1] Partially – the proposed remit and activities of the new telecoms advocate should be strengthened with appropriate KPIs derived from the key activities identified in the consultation. We note that a common criticism of activity in this area has been the difficulty of determining value for money rather than simple metrics based on expenditure for advocacy relative to household spend – these are **not** the same thing. We also note recent criticism from the lack of appropriate KPIs in “arms length” and statutory bodies made by, for example, the National Audit Office.

[2] Similar to point [1] we would argue that some of the research applauded in this consultation from other industries is not free from bias and hence may present results that would not pass independent peer review. A closer engagement with the UK research community might increase the quality and hence reduce the challenges to the research function proposed in this consultation.

Q1b - Are there any additional activities that should be included in its remit?

[3] Concerns can be raised about the presence of at least three different advocacy regimes running across NI, England and Wales, and Scotland. This also creates opportunities for methodologically sound comparisons of the effectiveness different approaches using the KPIs advocated within paragraph [1] of our response. Closer engagement with our members and with UKRI will help establish appropriate means of assessing the effectiveness of different advocacy mechanisms – especially with very different levels of consumer knowledge, technological support and of income across the UK.

Q1c - What are your views on how the new advocacy body should interact with other organisations, including Ofcom and the CCP?

[4] We note that the consultation makes no reference to the continued criticisms of Citizens Advice's relationship with government – in particular the Dept of Work and Pensions. We would urge safeguards to be put in place that preserves the role of CA as an authoritative and independent voice; if this model is to be extended from the existing sectors then the DWP controversy should be directly addressed and a set of coherent, evidence based principles should be derived to govern their role and ensure that consumers have trust in the transparency of their relationship with government, regulators and also with industry bodies. If consumers lose faith in Citizens Advice under the proposed model then the damage will be immediate and wide ranging across UK infrastructures.

Q2a - Do you agree that option 1 should be the preferred option and with our analysis of:

- **Option 1 (Appointing Citizens Advice)?**
- **Option 2 (Expanding the CCP)?**
- **Option 3 (Creating a new ALB)?**

[5] The existing proposal contains insufficient details about the organisation and finance of options 1 and 3 to make an informed decision. The consultation notes the complex and dynamic nature of the telecoms market – without further information it is hard to be sure that Citizens Advice will have access to the necessary technical and organisational resources to have a realistic expectation of meeting the KPIs identified in paragraph [1].

[6] We note the proposed use of the Ofcom levy ratified by the DCMS Secretary for State and also again note the potential perceived conflicts of interest that can arise when the public or media feel this approval process may limit the advocates ability to raise appropriate questions of government policy.

Q2b - Do you have views on other options we should consider, including for the period before new legislation is introduced and the new advocate is fully established?

[7] The principles for advocacy in regulated markets, proposed in [4], should provide a framework for retaining independent and at the same time encouraging constructive dialogue with industry partners and with regulatory agencies – this could be applied to options 1 and 3.

Q4a - Do you agree with our analysis of the likely scale of funding for the new advocate?

[8] The costs seem broadly appropriate – however, it might also be argued that greater sums are required to address the lack of previous investment in advocacy that is a strong theme of this consultation. However, this may create a compound effect where an increased levy leads to even greater public dissatisfaction unless there are clear and tangible benefits – associated with appropriate KPIs, for example in terms of social inclusion, that demonstrate the impact of the advocate.

Q4b - Are you aware of any other reasons that would make telecoms advocacy more or less costly than in other sectors?

[9] The complex and dynamic nature of the market creates significant costs for an agency in understanding the arguments that are often put forward by industry partners and by regulators to explain particular barriers/opportunities to the telecoms industry – for example in achieving levels of broadband coverage. While multi-industry advocate can create a “cleaner” relationship with consumers across government, it can create issues in recruiting and retaining staff with the breadth of competencies required across all sectors.