
From: [REDACTED]
Sent: 06 April 2017 17:34
To: Selene Rosso
Subject: EXTERNAL: Older people and consumer protection

Dear Selene,

I work for Age UK and am getting in touch re the recent Ofcom consultation on the [general conditions relating to consumer protection](#). I appreciate that the deadline has passed but hope you will consider a few broad points on older consumers.

Vulnerability

- We welcome Ofcom's moves to improve protection for consumers, including those in vulnerable circumstances. Specifically, we strongly support the proposal to introduce a new requirement for communications providers to put in place clear and effective policies for identifying consumers in vulnerable circumstances to ensure they are treated fairly and appropriately.
- We emphasise that anyone of any age can become vulnerable through their circumstances, but also that providers need to act fairly towards consumers in ALL circumstances, not just vulnerable ones.
- We have identified a range of circumstances that can make older people vulnerable, including – bereavement, loneliness/isolation, physical and mental health conditions, cognitive impairment or decline, and physical disabilities. Our recent response to [Ofgem's consultation on consumer vulnerability](#) outlines how we think energy suppliers should identify and plan how to respond to a range of vulnerabilities.
- However, we stress that age should not be equated with vulnerability – many older people are self-reliant and do not want to be seen as 'vulnerable'.
- For more information, see our [consumer vulnerability policy position](#).

Scams/fraud

- We welcome moves to improve protections for consumers from nuisance and scam calls. Fraud is now the most commonly experienced crime type, with the ONS estimating that adults experienced 5.8 million fraud and computer misuse incidents in a year (3.8 million fraud incidents and 2.0 million computer misuse incidents). Communications providers have a vital role in protecting consumers from online and telephone scams.
- Specifically, we support the proposals to extend regulation to improve the accuracy of the provision and display of the calling party's telephone number to end-users. However, it is important that vital calls from unfamiliar numbers – such as a hospital – are not unintentionally blocked.
- For more information on older people and scams/fraud, see our [policy position](#) and report [Only the Tip of the Iceberg: Fraud against older people](#).

Switching

- We welcome moves to enable consumers to easily compare, choose and switch products. We have highlighted the range of barriers to comparing/switching that many older people face, including – lack of awareness of being able to switch, feeling that it is a hassle, complexity in making comparisons (sometimes due to bundling), lack of access to the internet (and price comparison websites), and fear of disruption/disconnection.
- Also, a range of vulnerable circumstances can make it difficult for people to switch, e.g. sensory or physical impairments, ill health/being in and out of hospital, feeling overwhelmed by caring responsibilities.
- For more information and examples, see our responses to the Government's recent consultations on [switching principles](#) and [quicker switching](#).

We would be very happy to discuss or expand on any of these points.

Kind regards,



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