

12 March 2025

Ofcom Review of ADR in the telecoms sector

Thank you for the opportunity to comment on the Ofcom Review of ADR in the telecoms sector. We are supportive of Ofcom reviewing ADR in the telecoms sector as effective dispute resolution is key to building consumer trust and confidence.

Our answers to the questions are below.

Question 1: Do you agree with our provisional analysis of whether our rules which facilitate access to ADR are meeting our objective?

We agree with the provisional analysis that Ofcom's rules which facilitate access to ADR are meeting the objective. We think it is important to keep consumer journeys under review and as Trust Alliance Group, we are looking at how this is best done across our sectors in energy and communications. We think the use of technology and more effective systems could dramatically reduce the complaint burden on all consumers, whilst also benefitting companies and building trust in the sectors. We would be happy to discuss this further with Ofcom if that would be helpful.

Question 2: Do you agree with our proposal to modify the GCs to reduce the timeframe for access to ADR to 6 weeks?

We support reducing the timescale for consumers to be able to access ADR more quickly. As per Ofcom's analysis that while many consumers get their complaints resolved in six weeks, many complaints who go past that point, do not and have to wait for referral to ADR – so for that reason it makes sense.

We have also conducted research into consumer attitudes about the eight-week timescale. Our evidence suggests that four weeks is considered the most reasonable timescale. Our survey showed consumers aged between 18–34 expected complaints to be resolved within one to two weeks, while those aged 75 or older viewed six to eight weeks as a reasonable timescale.

We would be happy to share that information with Ofcom if that would be helpful.

Question 3: Do you agree with the findings of our provisional impact assessment?

We do agree with the findings of the provisional impact assessment. We think the proposal would ensure that there is effective and prompt access to ADR for consumers and we agree, that as some consumers are calling for a shorter timeframe to access ADR that this meets the objective to secure that procedures facilitating access to ADR are easy to use, transparent, non-discriminatory and effective.

Question 4: Do you agree with our proposed implementation period?

We think that a six-month implementation period is sufficient for us to make the necessary changes to our service, guidance and external information.

Question 5: Do you agree with our provisional assessment and proposal to re-approve both schemes based on the approval criteria set out in the Act? Please provide your reasoning.

We welcome the reapproval of our service to offer ADR in the Communications sector. We will continue to look at ways for consumers to access our service as timely and as seamlessly as possible.

Question 6: Do you agree with our proposed changes to the decision-making principles? Please provide your reasoning.

We welcome the streamlining of the decision-making principles, and the changes seem sensible.

Question 7: Do you agree with our proposed changes to the KPIs including the proposed implementation period? Please provide reasons.

We agree in principle with the proposed changes to the KPIs. We agree that it is important that consumers receive responses from us in a timely manner and that consumers receive the outcome of their complaint within a reasonable period of time. We also recognise the importance of ensuring consumers who contact us through digital channels receive a prompt response. We are confident in our ability to deliver a service over and above the proposed KPIs. We will need to review and scope the work to enable us to report on response times for digital correspondence and it may require technical development of systems before we are in a position to do so.

Please do not hesitate to contact us should you wish to discuss our response in more detail. Our response is not confidential.