

Your response

Question	Your response
<p>Question 1: Do you agree with our provisional analysis of whether our rules which facilitate access to ADR are meeting our objective?</p>	<p>Confidential – N</p> <p>We agree that Ofcom’s current rules facilitate access to ADR and work well for consumers and small businesses.</p> <p>We note Ofcom’s findings on the efficacy of the 8-week threshold for access to ADR and its proposal to reduce the timeframe to 6 weeks. We set our response on that proposal in Question 2.</p>
<p>Question 2: Do you agree with our proposal to modify the GCs to reduce the timeframe for access to ADR to 6 weeks?</p>	<p>Confidential – N</p> <p>Three need not be incentivised to improve its complaint handling procedures or tackle the root causes of complaints by a reduction in the ADR threshold. Three strives to continually improve its complaint handling procedures and address the root causes of customer dissatisfaction in order to deliver positive outcomes for its customers. However, having reviewed Ofcom’s analysis and research, we agree that the move to a 6-week threshold may improve customer outcomes for the minority of complaint cases which remain unresolved after 6 weeks. Whilst some complaints remain unavoidably unresolved at that time, usually because the subject matter of the complaint is complex, we appreciate that a period of 8 weeks may no longer meet consumer expectations in a fast-paced and digitalised world. We consider that a 6-week period is a reasonable timeframe for the investigation and resolution of <i>most</i> complaint types and accordingly support Ofcom’s proposal to reduce the timeframe.</p>
<p>Question 3: Do you agree with the findings of our provisional impact assessment?</p>	<p>Confidential – N</p> <p>Yes. We agree that Ofcom’s proposal is proportionate to its policy objectives.</p>
<p>Question 4: Do you agree with our proposed implementation period?</p>	<p>Confidential – Y</p>

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<p>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.</p>	<p>Confidential – N</p> <p>We agree with Ofcom’s provisional assessment and its proposal to re-approve both schemes, based upon the statutory assessment criteria. We consider that consumers can navigate the ADR process easily, and that consumers are receiving fair and broadly consistent outcomes from the schemes. Our experience of working collaboratively with our ADR scheme provider, the Communications Ombudsman, is positive and we consider that scheme providers also facilitate continuous improvement in the ADR process by sharing industry best practice and working with scheme members to drive operational efficiency.</p>
<p>Question 6: Do you agree with our proposed changes to the decision-making principles? Please provide your reasoning.</p>	<p>Confidential – N</p> <p>Yes, we agree. We have no substantive comments.</p>
<p>Question 7: Do you agree with our proposed changes to the KPIs including the proposed implementation period? Please provide reasons.</p>	<p>Confidential – N</p> <p>We note the proposed changes to the KPIs and agree they are set at an appropriate level. We also note that Ofcom will work with the schemes to harmonise and improve the consistency of their customer satisfaction data, and will ask the schemes to publish this information on their respective websites. This key metric will not only improve Ofcom’s oversight but will also allow scheme members to measure service quality.</p> <p>We have no concerns with the proposed implementation period.</p>

Please complete this form in full and return to ADRreview@ofcom.org.uk