

Citizens Advice Scotland response to Ofcom's consultation on quick, easy, and reliable switching

Scotland's Citizens Advice Network is an essential community service that empowers people through our local bureaux and national services by providing free, confidential, and independent advice. We use people's real-life experiences to influence policy and drive positive change. We are on the side of people in Scotland who need help, and we change lives for the better.

Question 1: Do you agree with our proposed new General Conditions to implement the One Touch Switch process?

Citizens Advice Scotland agrees with Ofcom's proposed new General Conditions to implement the One Touch Switch process. Using One Touch Switch will allow all customers to use a single process to move providers, regardless of who their provider is or the technology or network their provider uses. They will also be able to switch between providers of full-fibre broadband services on the same network. One Touch Switch will mean customers only need to contact their new provider, who will arrange and manage the switch on their behalf. It will ensure all customers can use a process that is easy, quick, reliable and ensures they have given their informed consent.

CAS firmly believes that the One Touch Switch process will benefit consumers who are thinking about switching as it will significantly simplify the process of switching providers. We are aware of previous Ofcom research showing that many people were previously put off switching as they believed it was simply too much hassle, or they did not want to have to inform their losing provider, or that things would go wrong in the switching process, such as loss of service or risk of double billing. We anticipate that this new process may also allow greater accessibility for disabled and elderly consumers, who may find the current switching process complicated. We also believe that the One Touch Switch process is likely to benefit consumers who are out of contract and perhaps hesitating about switching provider. CAS believes that this will help stimulate more effective competition and make it easier for consumers to take advantage of more affordable deals.

We welcome Ofcom's focus on how customers request and are provided with switching information. CAS agrees that the gaining mobile provider should be required to give residential customers personalised information regarding the impact of a switch on any other services they have with the losing provider. This will prevent inconsistency in the switching information requirements that apply to mobile and to fixed services for residential customers. We agree that this will help ensure residential customers using the existing Auto-Switch process are fully informed, and

can make effective decisions, having been advised of the effects of any switching decision on their bundled or additional services.

At CAS, we firmly believe in channel choice for all consumers; with consumers having access to different means of communications with their communications provider. This is essential for vulnerable consumers, who may require accessible communication to make informed decisions. With regards to paras 7.47 through to 7.56 of the consultation, we note the discussion regarding how to notify consumers of switching information in a way that is quick but that also meets consumer communication preferences. There is also a risk that consumer contact details held by providers may not be up to date and this element of the process risks slowing down the switching process for some customers.

We note Ofcom's analysis there are 3 possible ways to further Ofcom's policy objective of customers being able to switch providers in an effective and efficient way:

- A. Allowing the switching information to be sent to any of the customer's contact details that are already registered with the losing provider;
- B. Allowing the customer to specify to the gaining provider the method (e.g. post, email) via which they wish to receive the switching information from the losing provider; or
- C. Requiring the losing provider to send the information by the quickest means (unless the customer has requested otherwise) and to notify the gaining provider of the method by which the switching information has been sent so they can tell the customer.

We agree that option C maintains the policy objective of ensuring an effective and efficient way of switching provider, while also ensuring that consumers have a choice in the channel in which they are contacted.

Being informed about the means by which the losing provider switching information has been sent to them should help to ensure that the customer knows where to look for the information, and therefore be able to access it quickly and make an informed decision about whether to proceed with their switch. We feel that this would also allow vulnerable consumers to ensure that their preferred channel of communication is used by both providers.

We would also ask that all communication provided to customers in relation to the switching process uses language that is accessible and easy to understand. This is particularly the case for vulnerable customers and for all customers who may be required to return/allow an engineer to collect or dismantle any hardware that was provided by the losing provider.

Question 2: Do you agree with our proposed amendments to the Auto-Switch GCs?

CAS agrees with Ofcom's proposed amendment to the Auto-Switch GCs but does not wish to make any more detailed comments.

Question 3: Do you have any other comments on our proposals?

CAS has no further comments on Ofcom's proposals.