

Emailed to: planofwork@ofcom.org.uk

09 February 2024

Consultation: Ofcom's proposed Plan of Work 2024/25

Thank you for the opportunity to comment on the Ofcom proposed Plan 2024/25. In this response we have provided:

Section 1: Introduction to the Trust Alliance Group (Including the Communications Ombudsman and the Internet Commission)

Section 2: Our response to the proposed Plan of Work 2024/25

Section 1: Introduction to the Trust Alliance Group (Including the Communications Ombudsman and the Internet Commission)

Trust Alliance Group is a not-for-profit private limited company established in 2002 which runs a range of discrete national Alternative Dispute Resolution (ADR) schemes across different sectors, including the Communications Ombudsman, approved by Ofcom, and the Ofgem-approved Energy Ombudsman.

Our purpose is to build, maintain and restore trust and confidence between consumers and businesses and we're developing diverse capabilities and expertise in a range of areas including digital alternative dispute resolution and case management technology.

The Communications Ombudsman provides independent dispute resolution services, aiming to put consumers back into the position they were in before the issue occurred, whilst helping providers understand their customers and improve their experience.

With over 1,450 telecommunications companies signed up to our scheme - and over 15 years' experience in the communications sector - we are one of the alternative dispute resolution (ADR) schemes approved by Ofcom to impartially and independently handle disputes between consumers and providers.

In 2023 we accepted 25,000 disputes about providers in the communications sector and, using our insight, we continue to help providers improve their customer service.

The Internet Commission – a non-profit organisation which promotes ethical business practice to counter online harms whilst protecting privacy and freedom of expression and increase platform accountability – was acquired by the Trust Alliance Group in 2022.

The Internet Commission offers:

- Support to organisations who want to achieve high standards in online trust and safety
- Knowledge exchange where companies can discuss challenges and solutions related to tackling online harms

- A bank of good practices and reporting on the state-of-the art regarding governance and procedures of moderation of user-generated content online.

Section 2 – Our response to the proposed Plan of Work 2024/25

We support the proposed plan of work set out and the four consumer outcomes to be built upon in the forthcoming year: internet we can rely upon, media we trust and value, we live a safer life online and enabling wireless services in the wider economy.

We welcome Ofcom's continued focus on ensuring compliance with consumer protection rules, that these are robust and deliver positive impacts for consumers. As the cost-of-living crisis continues, we also support Ofcom's commitment to ensuring services remain affordable and that social-tariffs are both available and highlighted as an option for eligible customers. Key to the question of affordability is, of course, clarity about how much consumers are expected to pay and we are pleased to see Ofcom will continue its work to provide certainty and transparency in relation to inflationary, in-contract price increases.

While support is available to consumers, we know that many people can find it difficult to understand and access. In line with our approach to improving the accessibility and suitability of our own services, we support Ofcom's commitment to monitor and advance outcomes for vulnerable consumers.

We also support the focus on minimising the disruption and harms experienced by consumers who may rely on analogue services in light of the migration to Voice-over-IP (VOIP) services or be impacted by the 2G/3G switch-off.

With regard to making our lives online safer, we welcome the creation of new duties on Ofcom (and associated powers) to help make this a reality.

As people and businesses increasingly rely on online services for a growing range of activities – such as financial services, video-on-demand and public services – regulation will need to keep pace with emerging business models, digital convergence and disruption. We therefore welcome Ofcom's commitment to supervising platforms and utilising transparency reporting powers to gauge the effectiveness of systems and processes and to incentivise further improvements.

We are increasingly of the view that user access to impartial Digital Dispute Resolution should be established – to capture real consumer experiences, provide a complete overview of issues emerging in digital markets and allow users to challenge decisions they feel to be wrong. As in other markets, such a system would produce useful insight which would assist Ofcom and providers to drive improvements. TAG is developing our thinking and evidence base, with regard to the provision of Digital Dispute Resolution, and will share this with Ofcom at the earliest opportunity.

We are aware of Ofcom's regulatory roadmap, strategy and active consultations – relating to online safety – and look forward to sharing our learning and supporting Ofcom's work in this area.

As outlined in Section1, the Internet Commission is uniquely positioned to cast light on developments in the online safety space – including insight on business best practice, user experience and the efficacy of the various techniques employed to protect people online. We believe our global view of approaches to online safety can help facilitate knowledge sharing between different jurisdictions, regulatory systems and businesses.

Please do not hesitate to contact us if you would like further information regarding our response. Our response is not confidential.

For more information regarding this response, please contact:

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