

## Communications Consumer Panel and ACOD response to PhonepayPlus' strategic plan 2014-17

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### Introduction

The Communications Consumer Panel (the Panel) and the Advisory Committee on Older and Disabled People (ACOD) welcome the opportunity to comment on PhonepayPlus' Strategic Plan for 2014-2017.

The Panel works to protect and promote people's interests in the communications sector. We are an independent body set up under the Communications Act 2003. The Panel carries out research, provides advice and encourages Ofcom, government, the EU, industry and others to look at issues through the eyes of consumers, citizens and microbusinesses. The Panel pays particular attention to the needs of older people and people with disabilities, the needs of people in rural areas and people on low incomes, and the needs of micro businesses, which have many of the same problems as individual consumers. Through its Members, the Panel represents the interests of consumers in Scotland, Wales, Northern Ireland and England.

Following the alignment of ACOD with the Panel, the Panel is more alert than ever to the interests of older and disabled consumers and citizens.

### Response

**Q1: Do you have any views on how changes in technology, the market and/or consumer behaviour could affect the PRS industry over the period 2014-17? What do you think the implications of these changes might be for regulation and do you think we have sufficiently addressed these changes in our strategic plan?**

The Panel recognises the growing complexity of the market that PhonepayPlus regulates and the challenges that this presents. This consultation provides an opportunity for PhonepayPlus to establish priorities which can both regulate the market today and be flexible enough to adapt to future changes without stifling competition.

The Panel acknowledges that PRS is becoming part of a broader market for digital content and services and whilst this offers consumers a wide range of choice and options to pay, this growing complexity serves to underline an equivalent growing need to help and protect consumers.

It is vital that PRS regulation is able to keep pace with technological advances and legislative developments in the UK and EU; and that the Code is adequately future-proofed

against a fast-changing environment. We would strongly encourage working in partnerships not just nationally but also internationally to ensure that there is adequate cross-border consumer protection.

**Q2: Do you agree with PhonepayPlus' proposed vision statement for 2014-17? If not, what alternative would you propose and why?**

In the vision statement, PhonePayPlus refers to, "*Consumers of equivalent payment services are entitled to an equal level of confidence.*"

The Panel would be keen to see further detail included on how PhonePayPlus hope to achieve this part of their vision and would be interested to learn more about the specific actions and key deliverables.

**Q3: Do you agree with PhonePayPlus's proposed mission statement for 2014-17? If not, what alternative would you propose and why?**

The Panel acknowledges PhonepayPlus' mission to be a world-class regulator. In its current form, the mission statement incorporates information on both the overarching mission and the proposed steps to achieve the mission. It may be helpful to consider separating these out, highlighting the rationale for each action, desired results and providing measures against which progress can be assessed.

**Q4: Do you agree with PhonepayPlus' proposed core values for 2014-17? If not, what alternatives would you propose and why?**

It may be helpful to focus further on the core values that underlie the characteristics.

**Q5: Do you agree with PhonepayPlus' proposed key strategic objectives for 2014-17? If not, what alternatives would you propose and why?**

The Panel would suggest that Objective 3 '*To identify and prevent emerging risk to consumers*', should be the lead objective and Objective 1 *To help consumers to use premium services safely* be third in the priority list. Preventing consumer harm is always preferable to attempting to rectify it through enforcement.

We welcome that within the current Objective 1 there is a particular emphasis on the needs of more vulnerable consumers, including young people.