

Consultation Response

Citizens Advice consultation: Protecting consumers in a changing world (consumer work plan 2018/19)

February 2018

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About Age UK

Age UK is

Introduction

Age UK welcomes the opportunity to respond to this consultation. Citizens Advice carry out an important function as the statutory advocate for consumers of energy and postal services, conducting valuable consumer research which we regularly refer to in our own work with older consumers of energy and postal services. We broadly agree with the approach this work plan sets out, and the four themes projects sit. We respond below to the detail of those particular projects on which we have comment to make.

1. Strengthening consumer rights in a changing world

Age UK supports Citizens Advice of the opportunities and risks that our fast-changing world presents. We know that the increasing digitisation of services can disadvantage older consumers who are not online, and the ability to send and receive correspondence via mail is an important option for them. We also know from digital comparison tools¹ that vulnerable consumers are not always able or confident to take advantage of the new ways to shop around. We welcome Citizens plans to ensure that all consumers can exercise effective choice and redress in these changing environments.

Understanding the impact of potential changes to the Universal Service Obligation (1.3)

Age UK is concerned that the drastically reduced mail volumes postal services are facing may affect, and give rise to, potential changes to the Universal Service Obligation. As public and

we would welcome the development of MPS in a similar vein, this would not protect vulnerable consumers from fraudsters who we know target older people with postal scams like fake lotteries and prize draws. Citizens Advice could promote the development of more innovative protections for consumers from mail scammers who will ignore the MPS.

2. Ensure major projects & infrastructure investment deliver good value for customers

We strongly support Citizens Advice in its ambition to preserve access to Post Offices, as we know

Help consumers switch energy supplier Energy (3.4)

We agree that some consumers would be more likely to switch more often if systems were updated and improved their price comparison tool. However, we know there are multiple barriers to switching that comparison tools cannot solve alone. These include digital exclusion, vulnerable circumstances, lack of confidence in the benefits of switching (including unexpected losses or exclusions), complexity of comparisons and bundling, and a fear of disconnection or disruption⁵. These issues will need equal attention, for example through safeguard tariffs, if Citizens Advice seeks to improve the rates and benefits of consumer switching.

4. Protecting and empowering vulnerable consumers

Age UK strongly supports this strand of work. We regularly receive calls through our Information and Advice line from vulnerable older consumers who are not receiving essential services, or who are fearful about being cut off without adequate preparations to mitigate the impact.

Preventing crisis situations Energy (4.1)

We agree that energy consumers are vulnerable when they lose access to their heating and lighting, and we support the call that low-income vulnerable consumers should be given immediate price protection in the market. Citizens Advice should monitor the adequacy of the price protections that have been introduced.

