



WaveLength's response to Ofcom's proposed Plan of Work 2022/2023.

Communication is at the heart of preventing loneliness and isolation. The role that Ofcom holds as a regulator and how it delivers its work is therefore central to preventing loneliness for people within the UK.

WaveLength is the oldest loneliness charity in the UK providing everyday technology to prevent and combat loneliness. We measure and evaluate our work; therefore, can demonstrate how the provision of the equipment we provide significantly reduces loneliness and isolation and increases people's health outcomes.

We work across a wide range of beneficiary groups including care leavers, survivors of domestic violence, people experiencing the impact of cognitive impairments such as dementia, to those moving out of homelessness.

Although we welcome Ofcom's plan and the opportunity to be consulted upon it, WaveLength holds reservations about Ofcom's strategy and approach to changes and developments within the communications sector. We welcome Ofcom's initiative for fairness around consumers, however, we feel there is a need for this to be developed and not just monitored. This should be made a mandatory requirement for communications providers. The concept should be touchstones for Ofcom in terms of how it's conducting its work, particularly in the review of licenses and looking at structural changes within the market. We would recommend that Ofcom looks at applying the principles to its own process, not only in the present and future but also retrospectively reviewing its work.

Because of the role that communications play in preventing loneliness, we would encourage Ofcom to work with WaveLength to develop a loneliness prevention and measurement framework. This would help Ofcom to consider the impact of changes in the market – i.e. changes to infrastructure, switching from analogue to digital technology – and how these contribute to people's experience of loneliness. The framework can also guide the way research commissioned by Ofcom is carried out and how Ofcom regulates the sector, providing an opportunity to review and reflect on the impact of past decisions and learn from those outcomes to improve decision-making in the future.

Voice Over IP

WaveLength is particularly concerned about the proposal to replace analogue phone systems with digital ones. Analogue phone lines have provided a link to the outside world for many people who cannot leave their homes. It's a source of comfort, connection and companionship. For many people, this may be the only form of communication they have with another human all day.

WaveLength's concern is that there will be legacy equipment and costs imposed upon the user to switch from analogue to digital, and the new equipment required may be so alien that a significant minority of people will find the changes insurmountable leading to a barrier to access. This minority is typically older people and those on low incomes, who are also less likely to be able to afford to upgrade their equipment.

WaveLength is also particularly concerned that older people with cognitive impairments such as dementia will find it difficult to switch to using digital phones and therefore Ofcom's stance on platform/device neutrality may be unhelpful in this circumstance.

WaveLength also holds concerns for the disruption to personal alarm systems, which provide an element of safety for older people, as they may not work when power is lost. There could also be cost placed upon the consumer when switching from dial-up internet provision to digital, and some consumers may have difficulties installing Wi-Fi hubs. Potentially, this is going to affect older and disabled consumers as well as people on lower incomes more than the rest of the population. These changes could make people vulnerable and cut them off from communication technologies that are supportive and effective in reducing loneliness and isolation.

WaveLength is concerned that the proposed changes are going to increase loneliness and isolation across the UK and Ofcom should take this into consideration.

WaveLength notes that Ofcom is reporting that, “the majority of the UK now has the ability to link to broadband”, however, the COVID-19 pandemic has highlighted that not everybody can afford to take up the possibility of broadband. The stability of connection and the speeds have become stretched. The time to make significant changes to the system can be prohibited particularly when there are national emergencies.

The impact on people’s loneliness should not be underestimated. Ideally, WaveLength would have provided tablets to the over 70’s who were shielding in the first lockdown. The lack of infrastructure and cooperation from service providers led to WaveLength providing radios instead (5,000+ radios were distributed).

We believe Ofcom should be requiring service providers to connect every home and business in the UK and bring in an accessibility policy that could be means-tested to ensure that poorer households are able to have access to broadband services.

Radio

WaveLength is concerned at the proposals to allow BBC local radio to close down analogue transmitters and switch to purely digital programming, despite current analogue coverage currently far-exceeding what can be achieved digitally.

Key considerations include:

- Additional costs to the consumer from having to replace analogue radios with digital or Wi-Fi radios
- It could cause loneliness for many people who are reliant on radios for company throughout the day and night
- It may also mean that people lose their ability to receive local news and information about events within their community and local area

WaveLength is concerned that the change may hit older and disabled people disproportionately to other UK citizens. As with analogue phones, older people as well as people on low incomes and disabled people are more likely to be in possession of analogue-only radios and are likely to be more reliant on them - due to the added barrier they have in being able to leave their own homes. Potentially this change could also heavily impact groups with cognitive impairments who can have significant difficulties moving from a known piece of equipment to a new piece of technology.

Ofcom would be wise to follow a principle of asking the following:

- 1.) Are the planned changes likely to cause loneliness?
- 2.) Will the changes impose new costs on the consumer?
- 3.) Will the changes impose barriers to access?

Impact of license fee changes to service delivery for consumers

WaveLength feels that the proposed license fee and funding for public service broadcasting would be better taken at a point of taxation than the way that it is administered at present. However, changes within the license fee structure, and how it is announced and undertaken, need to ensure there is stability within service delivery from public service broadcasters.

We are concerned that the announcement to freeze the license fee for two years will cause the BBC to be rushed into cost-saving, which will lead to service cuts or rush forward changes that potentially could cause isolation and loneliness for UK citizens. We also feel this situation has been exacerbated by not giving any indications about how public service broadcasting is to be funded following the two-year freeze.



The BBC has already tried to cut services, such as the red button, which provides vital support and accessibility to many people who have not had access to the internet. It allowed them to access information that they would otherwise not have been able to.

Clarification around what services will be discontinued need to be made far in advance of such changes being implemented. The impact of these changes also needs to be considered, to ensure people aren't losing important services they depend on.

Every home needs to be connected

WaveLength remains concerned that research commissioned by Ofcom is not proportionately representative of the impairments and health conditions that people in the UK are living with. We are also concerned that Ofcom needs to have a wider remit in terms of considering the access barriers that need to be removed and therefore should be considering not just the impact on the blind and deaf communities. The legislation that guides Ofcom's operations needs to be updated to be more inclusive of other impairments and health conditions, and Ofcom needs to be more proactive in ensuring that it takes an inclusive approach to the way it regulates and oversees the communications sector, serving all UK citizens.

Ofcom needs to consider the barriers to communication services for people outside the deaf and blind communities, for example people with visual and/or auditory cognitive processing impairments. This includes but is not limited to, Alzheimer's, autism, dyslexia, dyspraxia, dysgraphia and others.

Ofcom research should make it clear which disabilities, health conditions or cognitive impairments are included in its reference to "disabled people". It should not be up to people to self-identify. WaveLength feels it would be helpful for Ofcom to move towards a social or barrier model of disability as opposed to one that is purely medical, as this would help it focus on the barriers that need to be removed to give people fair access to communication and help Ofcom follow its duty as outlined in the UN charter: to allow disabled people to choose how they communicate and how they are communicated with.

Ofcom must ensure that its reports and research are truly reflective of the make-up of UK society as its reports are often used by government departments such as DCMS to determine where resources will be allocated.

A prime example of this is the approach that has been taken to try and encourage more people to go online, which has focused on digital skills training. This cannot succeed as it doesn't address the issues. If Ofcom had looked at and reported on the extent of cognitive processing impairments, the approach taken by government with policies (such as digital by default and training) would have looked very different and would arguably create a more successful approach and a less lonely and digitally excluded society.

We also believe that Ofcom needs to centralise the budgets it spends on making its work accessible so as not to hold access budgets at a departmental level but at an organisational level in the same way that money for translation is allocated.

Ofcom should report on its spending on various impairments to ensure spending is proportional and reflective of the UK population. It should be reporting the work, and the time allocated to consider the access needs to communication for individuals, and that it is proportional to the UK population. We are concerned that because Ofcom has not been taking due and proper consideration and allocating resources and time sufficiently, that unfair barriers have not been addressed, impacting the efficacy of Ofcom's regulatory work.

Going forward, as Ofcom starts to regulate online services, we need to effectively ensure that service providers selling into and within the UK market are making themselves accessible to all users. For example, freephone numbers should be provided for customers who have cognitive processing impairments and have difficulty communicating in writing - even with text-to-speech technology. At present, there is an overwhelming reliance on chat bots, online agents, and text-based communication that is causing significant difficulties for significant portions of the UK population.



Ofcom has to be aware that monitoring complaints received by service providers may not be truly representative as most of the complaint procedures have to be done in a written format, immediately excluding a large number of consumers.

WaveLength is concerned that Ofcom is allowing communication service providers to implement changes and deliver services that could cause loneliness and make individuals particularly vulnerable. It is of further concern that many of these UK citizens are not having their needs correctly met by the communications sector in an accessible manner that allows them to communicate properly with others and raise issues and complaints with the service provider, regulators, and other bodies that will provide not only redress, but fair, equitable and accessible services.

WaveLength advises Ofcom, DCMS, and service providers, that two help schemes need to be initiated. One to cover the change from analogue phone lines to digital, and the other to cover the planned reduction in analogue radio services.

A national help scheme should be put in place to cover the transition of analogue to digital phones - the cost of which should be covered by service providers - to prevent loneliness and isolation and mitigate the impact that could have on people's health and emotional wellbeing.

"Data suggests proportion of UK homes without internet falls from 11% to 6%", according to a 2021 Ofcom media release. But 1.5 million homes in the UK still don't have internet access, and the 94% that do, don't necessarily have consistent or adequate connectivity. WaveLength is recommending that Ofcom should set as part of the licensing agreements and part of its regulations that all homes should be connected to a minimum-speed broadband without data caps, to allow low-income households to have access to basic broadband. Households could be identified by things such as pension credit and other benefits. It should be targeted and therefore means-tested.

Phones

The proposed changes to remove 2G and 3G also need to be reviewed and considered in terms of the possible impacts this could have on loneliness and placing new costs on the consumer, as well as accessibility issues that have been outlined for other equipment and services.

We are concerned that Ofcom and other service providers have not given sufficient consideration of what difficulties this could cause for consumers. WaveLength considers that a help scheme should also be put in place for this changeover.