

PE2199/A: Facilitate access to emergency telephone services for remote communities

Consumer Scotland written submission, 26 November 2025

Consumer Scotland is the statutory body for consumers in Scotland. Established by the Consumer Scotland Act 2020, we are accountable to the Scottish Parliament. We work to ensure that consumer interests are at the heart of a fair, transparent and sustainable Scottish marketplace.

I am writing to you regarding *PE2199: Facilitate access to emergency telephone services for remote communities*. This is an issue on which Consumer Scotland has conducted relevant work and I am writing to provide the Committee with further information about this.

The current UK traditional landline telephone network is reaching the end of its life and needs to be upgraded. By January 2027, the majority of consumers will have been migrated to Voice over Internet Protocol (VoIP) technology which allows users to make telephone calls over a broadband internet connection instead of a traditional telephone line.

For most customers, switching to VoIP should be straightforward and they will continue to receive what they recognise as a traditional phone service. However, VoIP landlines will not work in a power cut without additional backup systems being put in place. This in turn affects the operation of any devices linked to landlines such as telecare alarms.

Consumer Scotland has been engaged in research and advocacy on this issue since 2023, driven by our concerns about the impact the migration may have on consumers in Scotland. Specifically, we have concerns that:

- the migration may disproportionately impact some consumers in Scotland, particularly those in remote and rural areas,
- consumers were not fully aware of the change and its impact
- further measures were needed to mitigate risks.

In December 2023 we published our report, based on analysis of data produced by Ofcom's Communications Consumer Panel. Our [report](#) found that consumers in remote and rural areas of Scotland face disproportionate impacts from the migration as a result of poorer than average mobile signal and more frequent and longer lasting power cuts. We highlighted that taken together, these factors affected the likely ability of consumers in Scotland to make calls in the event of a power cut.

Our report made recommendations to telecommunications providers, Ofcom and the UK and Scottish governments on how these risks to consumers in Scotland could be reduced. This included recommending additional measures to protect consumers in vulnerable circumstances and improving public awareness through a consumer communications campaign.

Following on from the publication of our report, we have engaged directly with BT, Openreach and Virgin Media O2 to monitor progress with the migration and provided them with advice to ensure that their migration process did not disproportionately disadvantage consumers in Scotland. We have also raised concerns with Ofcom that the current thresholds for reporting outages, based on number of premises without service, may not sufficiently capture the impact of outages on remote and rural areas of Scotland, where population levels may not be high enough to meet the threshold. Ofcom has subsequently noted an intention to introduce a further threshold, based on the duration of outages, which we welcome.

In March 2024 we wrote to the UK and Scottish governments outlining our concerns and advocating for improved communications and resilience for consumers in remote and rural Scotland. In December 2024 we again wrote to the Department for Science, Innovation and Technology (DSIT) Minister highlighting the risks to some consumers. These letters and the responses received can all be found on our [website here](#).

We are pleased that some progress has been made in response to our concerns. The UK Government has worked with providers and stakeholders to produce a [Telecare National Action Plan](#) and awareness raising plan. A set of safeguards to protect vulnerable customers was also developed as part of a new non-voluntary migrations checklist. This checklist identified a number of risk factors arising from our research, including landline reliance or the lack of a reliable mobile signal. We are aware that work is also continuing by providers to develop improved backup or interim solutions for consumers at greater risk.

We continue to engage with Ofcom, DSIT, the Communications Consumer Panel and individual communications providers to monitor progress and to identify risks to consumers and ways to mitigate these, for example by improved backup solutions, or better communication. We are also engaging with the Scottish Government and local authority stakeholders to encourage improved data sharing which may enable providers to more easily identify consumers who need support. We are also working with stakeholders such as Trading Standards Scotland to ensure that potential for scams to occur during the migration process is identified and risks mitigated where possible.

We would be happy to engage with Committee to provide further detail about our work in this area. As the deadline for migration of January 2027 approaches, it is essential that consumers are well informed about what the migration will mean for them, and that stakeholders are clear about what needs to be done to ensure that consumers are protected.