Digital

How CPIN plays a vital role in improving outcomes for consumers in a digital world

BSI Consumer & Public Interest Network (CPIN)

CPIN is an independent network of volunteers trained to represent the UK consumer voice in standards. CPIN focuses its work in five priority areas:
- Consumer safety
- Consumer vulnerability
- **Digital**
- Services
- Sustainability

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Consumer and Public Interest Network
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Protecting consumers from harm in the digital market

Digital is one of CPIN's five priority areas. The balance between the benefits and potential harm of a rapidly expanding digital world can easily tip the wrong way; international solutions need to be developed.

A recent report by Consumers International into product safety[2] highlighted the privacy risks inherent in connected devices, including toys, and UK consumer organization Which? has conducted research into consumers' relationship with their data. It found that while consumers recognise many of the benefits of sharing their data with organizations, there is also a 'widespread sense of disempowerment, with many people unsure of either the impact that data use has on them or whether it is even worth trying to take any action about practices that concern them'[3].

The charity Age UK has highlighted that a high proportion of over 75s are not online, leaving them at risk of digital exclusion, while one of disability charity Scope's priorities is to ensure that innovations in technology include disabled people.

The UK government has taken steps to address concerns, publishing a code of practice for manufacturers on the consumer internet of things (IoT)[4], and proposing a new watchdog to ensure that websites take more responsibility for tackling online harms , but gaps remain in online consumer protection.

Risks of consumer harm in a digital world

Physical harm:
This may be through direct use, such as health problems caused by spending too much time at a computer, or indirect risks as the result of critical digital systems failing or being hacked, such as health services that rely on a digital element or autonomous cars.

Emotional harm:
Failure to adequately police what is published online can result in cyber-bullying, online child abuse and the spread of terrorist or racist content. Emotionally damaging content can in turn cause physical harm to vulnerable consumers.

Financial harm:
The ability to make easy and seamless digital purchases, unhindered by physical interventions, runs the risk of a consumer running up debt – online gambling is a particular problem area. Meanwhile cybercrime is rising; hacked data can be used by criminals to commit ID theft, while fraudsters are increasingly targeting victims through email, SMS and social media.

Risks to the privacy of personal data:
Consumers must frequently provide significant personal details for products and services to work, yet few consumers fully understand how their information may be used by organizations that gather it. This risks their data being used in ways they wouldn't expect or want – for example being targeted by marketing based on profiling.

[1] https://www.mckinsey.com/industries/automotive-and-assembly/our-insights/disruptive-trends-that-will-transform-the-auto-industry
[2] https://www.consumersinternational.org/media/155104/productsafetyreport-full.pdf
[3] https://www.which.co.uk/policy/digitisation/2659/control-alt-or-delete-the-future-of-consumer-data-main-report
[4] https://www.gov.uk/government/publications/code-of-practice-for-consumer-iot-security
[5] https://www.bbc.co.uk/news/technology-47826946

The digital age offers opportunities and benefits for consumers, but the speed of innovation and the complex nature of digital ecosystems also poses the risk of new forms of consumer harm (see box 'Risks of consumer harm in a digital world').

More and more consumer products include a digital element, from fitness trackers to toys. Smart energy meters let consumers monitor their energy consumption, from in-home displays or their mobile phones, while it's predicted that autonomous cars, controlled by artificial intelligence, could comprise up to 15% of global new car sales by 2030[1].

It is increasingly difficult to be an engaged and informed consumer without being connected, as organizations increasingly rely on digital as a primary tool for account management and communication. Consumers, in particular those who are vulnerable, often find it difficult to understand the complexity of digital products and services. It is unrealistic to expect them to take responsibility for avoiding harm. Suppliers need to ensure their products are well designed, fit for purpose and safe.

The value of standards

Standards can play a vital role in improving outcomes for all consumers, by detailing good practice for organizations such as government, public authorities, manufacturers, retailers and service providers to follow. They can encourage organizations to think about consumers' needs at each stage of design, development and delivery. BSI's Consumer and Public Interest Network (CPIN) makes sure that the needs of consumers operating in a digital world are considered in the development of all relevant standards.

Standards can help to both underpin and fill in gaps left by regulation. They can ask the right questions about evolving digital technology, such as the ethical implications of AI, and lay down good practice for companies producing connected products and services.

The fast pace of technological development mean that standards have to address new risks associated with 'being online', including interoperability, ownership and security of data, access to software updates and security against malicious attack.

One standards solution is a 'by design' approach proposed by ISO Consumer Policy Committee (COPOLCO) and led by BSI CPIN. Starting in 2018, ISO committee PC 317 has been developing an international standard, ISO 31700 Consumer protection: privacy by design for consumer goods and services. Participation has included consumer organizations such as Which? and Consumers International, as well as other key stakeholders, including government, industry, academia and consumer product manufacturers. The Privacy by Design standard will:

- Address the governance of, and accountability for, the privacy performance of products;
- Provide good design practices to ensure that products and services take account of the real world use of products by consumers;
- Ensure that security is monitored and maintained throughout the life of a product;
- Allow responsible companies to demonstrate that they have undertaken due diligence in the development of their products, providing reassurance to prospective customers and building their brand reputation alongside consumer trust.

Key consumer issues

Digital technology is relevant to a wide range of products and services and thinking about the key consumer principles can ensure that consumer issues are addressed and nothing vital is missed

Access

The internet has improved consumers' access to a huge new range of goods and services. Voice-activated home hubs, such as Amazon's Alexa or Google Home, may improve access for consumers with visual challenges - though this may also risk other members of the family accessing services without approval.

Complex technology can mean that consumers find it difficult to access or expose them to risks, such as loss of data or additional costs to use services. Where appropriate, organizations should offer a choice of ways to interact with them, so that all consumers can access their products and services. Campaigning organization Keep me Posted[6] has pointed out that some 5.2 million UK households don't have internet access, so relying on online methods of communication risks excluding these consumers.

Choice

Even consumers with the technical ability to easily access information online can find it difficult to make the right choice - often it's unclear how the results of web searches are sorted and prioritised. Are certain businesses paying for their products and services to be given prominence? What criteria or attributes have been used? Is the full range of options displayed? BS ISO 20488: 2018, Online Consumer Reviews, provides good practice for the collection, moderation and publication of online consumer reviews, but reviews are only part of the picture. Information on the location of the organization, terms and conditions, and how to make a complaint or access redress need to be clear. It's often even difficult to know which sites are legitimate and which are fake.

The size of big online tech firms such as Google, Facebook and Amazon means that consumers may sometimes feel they have little choice about using them. It's important that organizations build consumer confidence by following good practice. Consumer trust in Facebook, for example, was put to the test by the Cambridge Analytica scandal, where it is claimed that Facebook allowed consumer data collected on its platform to be used for the political manipulation of users. One UK survey conducted in the aftermath found that 53% of respondents trusted Facebook less as a result[7].

[6] https://www.keepmeposteduk.com/get-the-facts
[7] https://www.campaignlive.co.uk/article/trust-facebook-brand-irrevocably-damaged-eyes-consumers/1460605

Information

Consumers need to be informed throughout their customer journey, from installation to software updates. Recent research from Which? found that typical terms and conditions for online shopping and social media sites are harder to understand than Stephen Hawking's 'A Brief History of Time', and yet the average time to accept terms and conditions online is eight seconds. Meanwhile failure to provide good security set-up information for digital devices could leave them open to hackers. It is important that information is presented clearly and simply so consumers can read and understand it in a timeframe that reflects a digital reality.

Redress

It should be clear to consumers who is liable if things go wrong, and where they can seek redress. In some cases, problems may be systemic, affecting multiple consumers. Yet vulnerability disclosure processes for reporting potential system weaknesses so that they can be dealt with are often poor. As more and more products join the IoT, such ecosystems will become more difficult for consumers to navigate. Consumers in vulnerable situations may find it particularly difficult to understand or assert their legal rights. CPIN has also published a leaflet on consumer vulnerability, another of its priority areas, which you can read for more information.

Representation

It is important that organizations work with user groups to better understand their needs and abilities. If user testing can be built into the design stage, products and services are more likely to meet consumer needs, avoiding subsequent problems, reducing complaints and building consumer trust. Consideration needs to be given to the vulnerabilities and capabilities of intended users, as well as to unintended use of products.

Safety

As with other products, digitally connected devices can pose physical risks, for example if the operating system fails in an autonomous vehicle and causes a crash. But consumer safety can also be put at risk by poorly designed privacy and security systems.

Numerous instances of high profile data security incidents have put consumer data at risk of abuse by criminals, potentially providing access to consumers' personal and financial details. These details can be used to commit identity theft, access bank accounts or target scams more effectively, risking emotional distress and financial harm. In late 2018 the records of more than 500 million customers of hotel chain Marriott were exposed after they were hacked by an unauthorised party – including names, contact details and passport numbers.

Meanwhile, research carried out in 2018 by organizations including University College London and Privacy International highlighted the way in which smart devices can be misused to intimidate and control victims of domestic abuse[8].

Organizations are increasingly using artificial intelligence (AI) to automate consumer services, developing beyond today's chatbots and voice recognition. AI can potentially offer huge benefits – its capacity to monitor and analyse vast swathes of information can detect and block social media posts that contain words and phrases linked to bullying[9]. But it also has the potential to cause harm: AI depends on the data it is built on, and needs to follow good practice development processes to ensure that ethical considerations are taken into account.

Sustainability

Some 'smart' products consume considerably more energy than their 'dumb' alternatives – though to counterbalance this, they may also be used to control and reduce energy consumption. There are also questions around their lifespan. According to the UK's National Audit Office, many first-generation smart meters have been reported as losing function when a customer switches energy supplier. If products are not built to be future proof – including agreeing standards that enable interoperability with other products and services – they may have an unnecessarily short shelf life.

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[8] https://www.bbc.co.uk/news/technology-44765830
[9] http://www.bbc.com/future/story/20190207-how-artificial-intelligence-can-help-stop-bullying

What is CPIN?

BSI's Consumer & Public Interest Network is an independent network of volunteers trained to represent the UK consumer voice in standards. Funded by the British Standards Institution (BSI) with additional support from the Department for Business, Energy and Industrial Strategy, CPIN works closely with consumer and public interest organizations to:

- Ensure that standards address real issues that matter to real people
- Represent the voice of all consumers, including children, older people and those with disabilities
- Add value to standards and help to build consumer confidence and trust in businesses that use them

CPIN focuses its work on its five priority areas, where there is high potential for consumer detriment, in order to improve outcomes for consumers and minimize harm.

Further information

BSI

UK's national standards body. To find out more about standards or to get involved:

bsigroup.com

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ISO COPOLCO

Consumer Policy Committee of the International Organization for Standardization

iso.org/copolco

🐦 @ISOConsumers

ANEC

European consumer voice in standards

anec.eu

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Consumers International

A membership organization that brings together 200+ consumer groups worldwide

consumersinternational.org

🐦 @consumers_int

For more information about CPIN, or to find out how to get involved, email consumer@bsigroup.com or visit bsigroup.com/consumers.

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