
Table of content

PAGE 3

1 Abstract

PAGE 4

2 What is outsidersness in the consumer markets?

PAGE 5

3 Signs of increased outsidersness during and after the pandemic

PAGE 7

4 Survey by the Norwegian Consumer Council

PAGE 9

5 Main findings from the survey

PAGE 11

6 Consumers' access to goods and services in different market segments

6.1 Comparison of the market segments

6.2 Possible problem markets

PAGE 13

7 The most difficult retail outlets to shop at

PAGE 14

8 Missing tools

8.1 Reasons given by consumers

8.2 Lack of interest and skills

8.3 When the market refuses to accept cash

8.4 Unwillingness to be tracked

8.5 Lack of access to BankID and Vipps

8.5.1 The scope of BankID

8.5.2 Bank practice

8.5.3 Groups that become outsiders

8.5.4 Prerequisites for use of Vipps

8.5.5 Future solutions that are being considered

8.6 Lack of internet access

8.7 People with impairments

PAGE 25

9 Who are the outsiders in the consumer markets?

PAGE 28

10 How is outsidersness experienced in the consumer markets?

PAGE 30

11 Conclusions

PAGE 32

12 Sources and references

1 Abstract

Access to the tools required to order and pay for goods is necessary for consumers to be able to access consumer markets. The UN Resolution regarding consumers' right to access to important goods and services applies regardless of whether the provider is public or commercial.

The pandemic has reinforced the growing need to use telecommunications networks, hardware and software to order or pay for goods and services. Concurrently, consumers' ability to obtain goods and services in the traditional way, including through cash payment, has been considerably reduced.

From a nationally representative sample of 2016 respondents, 43 per cent report that there are people within their close family or social circle whom they regularly help order or pay for goods and services. As many as 38 per cent state that during the past year, they have had great difficulty buying one or more goods or have not been able to buy them at all. It is younger respondents who report most frequently that they have problems. The high proportions show that vulnerable groups are not the only ones who have difficulty gaining access.

These challenges are virtually of the same order in all market segments. Health services, public welfare services and transport services are considered slightly more difficult to access than others. The majority – 75–90 per cent of consumers in the different market segments – report that they usually have no problems placing orders or effecting payment. However, a large minority – 10–25 per cent of consumers in each market segment – report that they have had problems placing orders or effecting payment during the past year or that they have not been able to do either at all.

A lack of interest and digital competence, as well as fear of making mistakes are the main reasons cited by

consumers for not using digital instruments to order or pay. Many respondents state that they prefer paying in cash and that they do not want to be tracked. The following technological and institutional obstacles to consumers' access to goods and services also stand out:

- The findings in the survey by the Norwegian Consumer Council indicate that about 200 000 people in Norway do not have BankID identification (4 per cent) and that a similar number do not have a smartphone (5 per cent). Roughly 360 000 people over the age of 16 do not have the Vipps instant payment app (9 per cent). BankID and Vipps are owned and managed by financial institutions, which are under an obligation to comply with the anti-money laundering legislation.
- The main reason given by a large proportion of those who report that they do not use digital tools to buy or obtain something is a lack of internet access where they live and make purchases. This applies to, inter alia, 16 per cent of those who do not use BankID.

We have reason to believe that a large number of people in Norway already feel that they do not have access to goods and services that are important to them. There is a need for broad-ranging measures which improve consumers' access to goods and services from the public sector and commercial providers.

2 What is outsidersness in the consumer markets?

All over the world, people rely on access to goods and services in consumer markets for their welfare. This applies in countries where production is organised in different ways and in completely different political systems. Relatively free market solutions are common for goods like food and clothing, while for many important services, for example in education and health, countries differ in terms of the extent to which the markets are responsible for ensuring that needs are met.

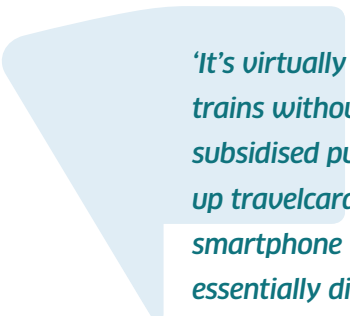
In the worst case, people who are unable to access goods and services in consumer markets may fail to have their basic needs met. The UN has therefore put high priority on the right of consumers to access to important goods and services, as the first of eleven consumer rights adopted in [Resolution 70/186 of 22. December 2015](#). The rights explicitly apply to goods and services from public and commercial enterprises.

The inability to have key needs met in markets may also be a result of people having little purchasing power and few financial resources. However, increasing the purchasing power of groups and individuals generally

lies outside the purview of consumer policy, and therefore is not discussed in this report. When we talk about outsidersness in consumer markets, other factors than the financial strength of consumers are what prevent them from obtaining goods and services. They can become 'digital' outsiders, mainly as a result of a lack of digital skills, but also as a result of technological, institutional and legal factors, and combinations thereof.

For consumer markets to play their intended role in society, consumers need to be able to acquire goods and services in practice. This means, inter alia, that anyone who needs to order and pay for goods and services generally needs access to the necessary telecommunications networks, hardware and software, and must know how to use them. Real alternatives are also necessary when digital tools are inadequate.

Today we see that it will take some time before all Norwegian consumers have equal access to consumer markets.



'It's virtually impossible to pay on buses, trams, light rail, and trains without a smartphone with an app. Being able to pay for subsidised public transport with money, a bank card or a topped up travelcard should be a given. Requiring everyone to have a smartphone with an app to travel by public transport is essentially discrimination.'

3 Signs of increased outsidersness during and after the pandemic

The pandemic saw a great increase in the need to purchase goods and services digitally, and thus use digital instruments to order or pay for goods or services. Traditional ways of shopping were replaced with new purchasing methods at a much faster pace than before, as a result of infection control considerations. This development has been seen in both traditional online shopping and in physical retail outlets and in the consumption of both commercial products and public services.

Increased online shopping

In February 2022, Statistics Norway reported record levels of online shopping in 2021. [record levels of online shopping in 2021](#). Norwegians effected payments and transfers using Norwegian payment cards, including Vipps payments, worth NOK 231 billion. This is a 26 per cent increase, compared with 2020.

As a result of requirements regarding security in the EU's Payment Services Directive ([strong customer authentication](#)), in practice a requirement was introduced on 1 January 2021 for 'Norwegian' online shops to use the financial services industry's identification solution - BankID - to place orders and effect payment.

Articles in the media regarding negative consequences

During the pandemic, the media reported a number of cases where consumers had difficulty making purchases. Several of them are presented in the following:

- This [article in Dagbladet on 22 June 2021](#) covered the need for BankID to use public services and to obtain an updated COVID-19 certificate when buying travel, as well as how use of Vipps becoming widespread in physical retail outlets during the pandemic made it difficult to perform a transaction as simple as buying a pastry.
- An [article in Dagens Næringsliv on 7 September 2021](#) showed how a woman with autism was not allowed to establish BankID because her bank believed that there was a risk of her guardian using it.
- This [article on NRK.no dated 13 May 2022](#) reported that a woman was denied digital identification at DNB to access banking services because she had an outdated mobile phone.
- This [article dated 3 June 2022](#) on NRK.no showed that bank customers' accounts were blocked because they did not provide proof of identity on time, something which in practice has required access to BankID for many people.

Cash being phased out

The use of cash has been on the decline for many years, and this trend accelerated during the pandemic. According to [Norges Bank](#), this decline is part of a long-term trend, but it is likely that the COVID-19 pandemic accelerated the decline. From the autumn of 2019 to the spring of 2020, cash payments dropped from 7 per cent to 3 per cent. Fewer people chose to pay in cash, both as a result of fear of infection and because many retail outlets asked people to use other payment methods. According to Norges Bank in December 2021, cash has yet to see a resurgence.

Both during and after the pandemic, the Norwegian Consumer Council's guidance service received a steady stream of inquiries from consumers regarding difficulty purchasing goods and services using cash, including on public transport, in cafés and in physical shops.

[In June 2021, businesses organised under Virke, the Federation of Norwegian Enterprise](#), declared that cash as a payment method should be abolished fully.

Consequences for consumers

There is reason to believe that the changes to how goods and services are ordered and paid for feel useful and represent savings for providers and large groups of consumers. It is therefore also likely that the changes will continue for many after all the infection control measures from the pandemic have been lifted. It is nonetheless important that we are aware that some groups in society will not have the same opportunities to participate in the new shopping patterns and that some of them will become outsiders.

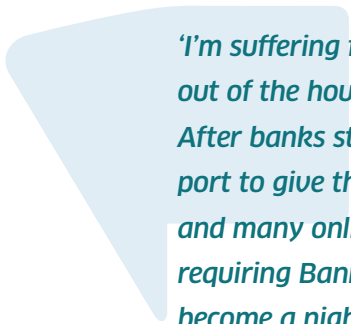
At present, it is normal for consumers to have and be able to operate hardware, digital ordering tools, payment instruments and electronic identification to be able to participate in ordinary consumer markets. The most common requirements for online shopping are high-speed broadband, a smartphone/tablet/PC, QR code scanner, apps developed by providers, BankID and Vipps. Not having some of these can create a threshold

when the consumer needs to use the markets. Failure to meet one or more of these requirements for purchases can result in full or partial exclusion from ordinary consumer markets. This can have very serious consequences for those concerned.

Groups of consumers not having or being able to use the instruments they need to order or pay can also have an unfortunate effect on how well society's resources are used. If, for example, many passengers on public transport have difficulty buying a ticket because they do not have access to the necessary instruments at the moment of purchase, this could result in bus routes seeming unprofitable and being shut down on the wrong grounds.

The Norwegian Consumer Council accordingly issued the following warning in June 2021 in its consultation response to **NOU 2021: 4 NORWAY TOWARDS 2025**:

'The authorities should be wary of mechanisms which may result in consumers being permanently excluded from digital and physical marketplaces.'



'I'm suffering from PTSD and can't get out of the house due to my anxiety. After banks started requiring a passport to give their customers BankID and many online stores started requiring BankID to shop, my life has become a nightmare! Not being able to buy the essential things I need any more makes me feel helpless, small, and worthless, and I wish I died so I wouldn't bother people any longer.'

4 Survey by the Norwegian Consumer Council

The company YouGov AS carried out a survey from week 51 of 2021 to week 2 of 2022 on behalf of the Norwegian Consumer Council. The target of the survey was to chart outsidership in consumer markets. This means whether consumers feel they are unable to obtain goods and services because they do not have access to the necessary instruments for placing orders and effecting payment, and to what extent this is the case.

The Norwegian Consumer Council has given priority to gaining an overview of the extent of people's problems placing orders or effecting payment for goods and services. This picture will provide a

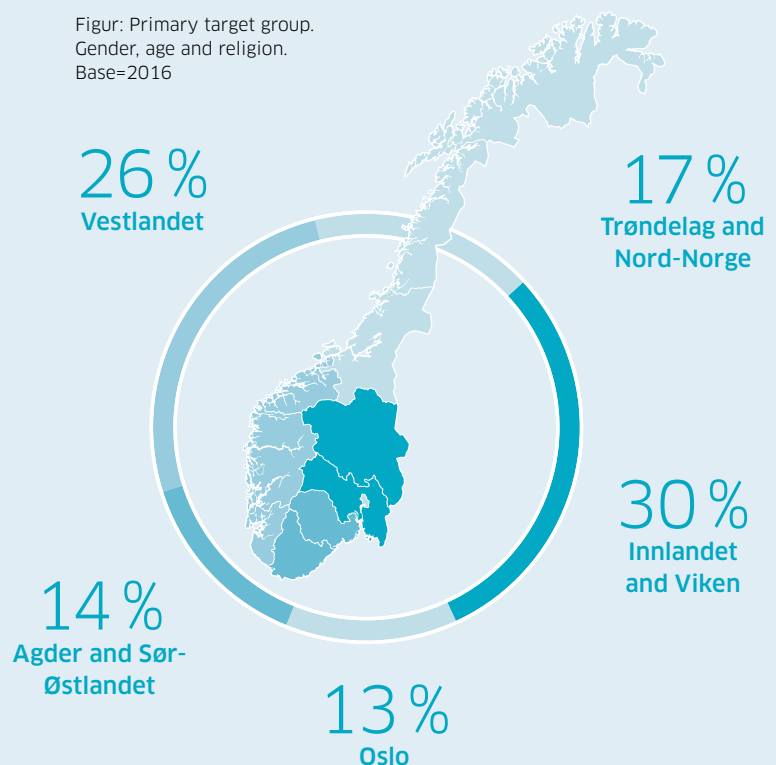
foundation for developing consumer policy. The survey was conducted by means of an online interview with a nationally representative sample of respondents aged 16 years and older, and had three parts: questions for a primary target group, questions for a secondary target group (people who receive help with online tasks from the primary target group) and, finally, qualitative interviews with the people in the secondary target group conducted by the primary target group.

Primary target group – a nationally representative sample

A nationally representative sample of 2016 respondents – called the 'primary target group' answered questions about their use of digital tools and whether they have difficulty placing orders or effecting payment for goods and services. The responses from the primary target group were collected online, and there is thus reason to believe that people with digital challenges are underrepresented within the sample. The proportion of responses calculated based on the answers of the primary target alone must be seen in light of this.

The primary target group was composed representatively, based on gender, age and region. The figures show the distribution of the respondents according to the background variables used in the study.

Figur: Primary target group. Gender, age and religion. Base=2016

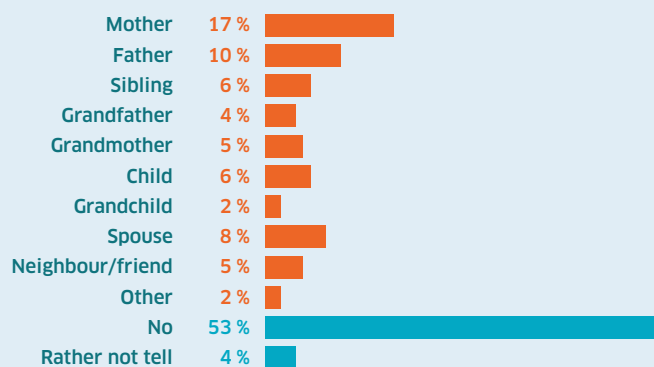


The secondary target group – people who need help to order or pay for goods and services

The secondary target group consisted of 832 people who receive help from people in the primary target group and is in addition to the primary target group

Almost half of the respondents in the primary target group report that they help others order and pay for goods and services. The mother is the person who needs the most help. Seventeen per cent of respondents state that they help their mother, and 10 per cent state that they help their father. Fifty-three per cent report that they do not help anyone and 4 per cent prefer not to answer.

For various reasons, some people need help to order or pay for goods and services. Is there anyone in your immediate family or social circle who you help regularly with ordering or paying for goods and services?
Base=2016



The respondents in the primary target group who help others also answered on behalf of the person they help. The secondary target group was asked the same questions as the primary target group: What digital tools do they use, and what are their challenges?

Separate survey with feedback from the secondary target group

Finally, people in the primary target group conducted a more qualitative 'interview' with the people in the secondary target group whom they help with purchases. About 270 such interviews provide the basis for the report from the survey.

YouGov's findings are summarised in the report *Utenforskap i forbrukermarkeder – Digitale og andre hindre for forbrukernes tilgang til vanlige markeder* [Outsider-ness in Consumer Markets – Digital Obstacles and Other Obstacles to Consumers' Access to Regular Markets], which is the primary source of this report from the Norwegian Consumer Council.

General charting of needs

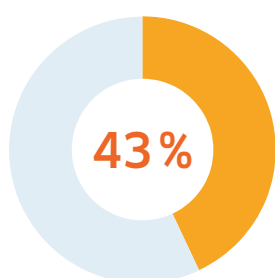
The survey was designed to describe the general situation for consumers, and it covers all consumer markets. Its objective was to answer the question of whether new forms of placing orders or effecting payment challenge consumer rights, and to provide a foundation for identifying areas which require further examination. In section 11, Conclusions, the survey addresses several important intersectoral challenges at a general level.

'I don't like the QR system, and I don't like Vipps. My smartphones usually aren't any good.'

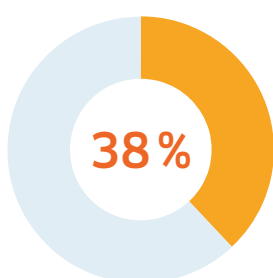
5 Main findings from the survey

The figure below shows the findings that YouGov highlighted in the report that was delivered to the Norwegian Consumer Council. As many as 38 per cent of the primary target group report that during the past year they have had great difficulty placing orders or effecting payment or have been unable to buy one or more goods or services at all. A similar proportion, 43 per cent, report that there are people within their close family or social circle whom they regularly help with purchases.

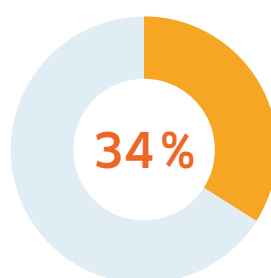
The findings indicate that almost half of the population have great challenges buying goods and services or that they have people close to them who need help. The 43 per cent who state that they help others each help 1.5 people on average. The large proportions tell us that, at present, vulnerable groups of consumers are not the only ones who are excluded from the markets, but that problems with placing orders and effecting payment impact on the markets in a number of ways.



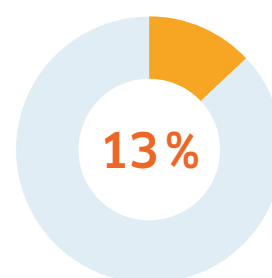
Help someone regularly to order and pay for goods and services



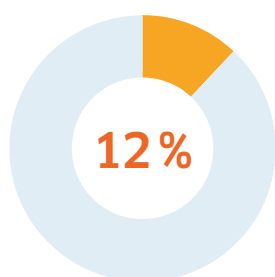
Have trouble buying goods and services



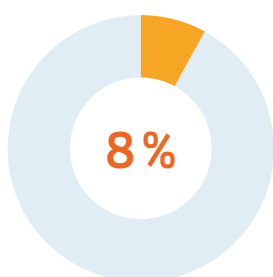
Do not use QR scanners



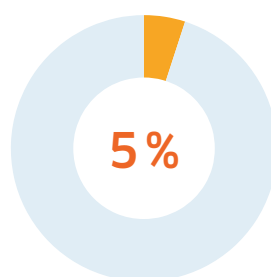
Do not use smartphone apps



Do not use Vipps

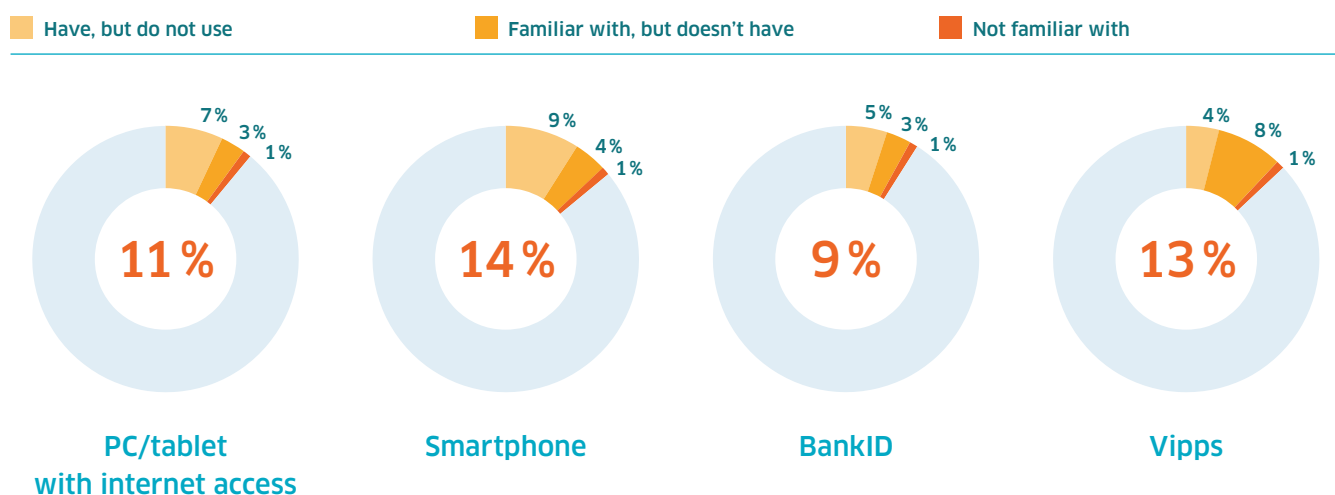


Do not use BankID



Do not use digital aids due to disabilities

The answers further indicate that relatively large groups, even if they represent a minority, do not use, have or are familiar with a number of the tools which are virtually necessary today to be able to make purchases.

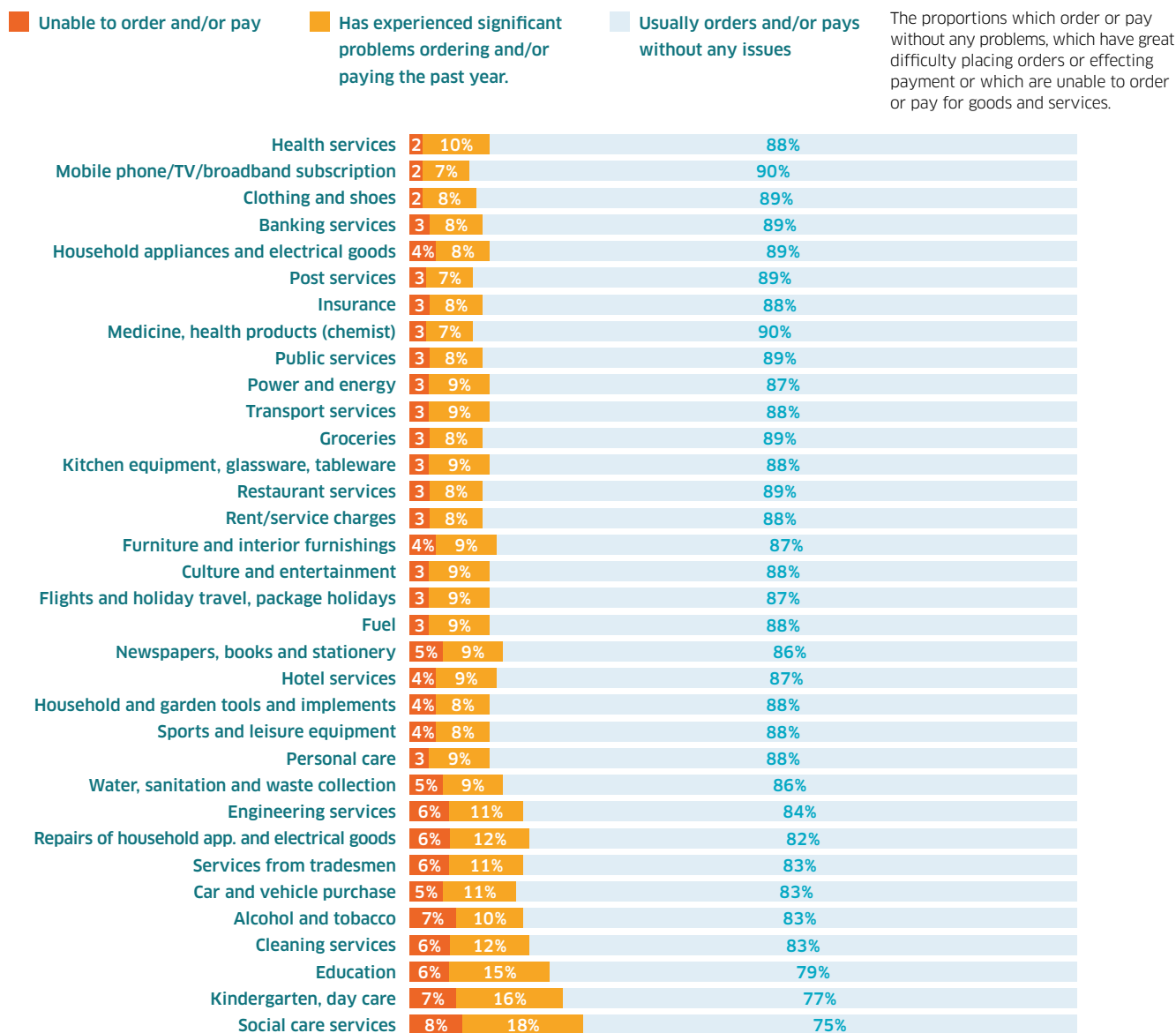


Base: 2016 (primary target group)

For example, as many as 9 per cent of the primary target group respond that they do not use BankID, do not have it or are not familiar with it. The corresponding figure for Vipps is 13 per cent and for smartphones it is 14 per cent. Note that these proportions are cautious estimates, as the primary target group consists of people who have relatively good digital skills.

According to Statistics Norway, in the first quarter of 2022, one per cent of the population aged 16 years and older amounted to 44 544 people. The responses from the survey thus indicate that the group that does not use BankID consists of about 400 000 people, and that almost half of them do not have BankID at all. The group that reports to be familiar with Vipps but do not have it represents 8 per cent of the population aged 16 years and older – corresponding to 360 000 people.

6 Consumers' access to goods and services in different market segments



The survey by the Norwegian Consumer Council shows that a large majority – 75–90 per cent of consumers in the different market segments – report that they usually have no problems placing orders or effecting payment. However a relatively large minority – 10–25 per cent of consumers in each market segment – report that they have had great problems placing orders or effecting payment during the past year or that they have not been able to do either at all.

6.1 Comparison of the market segments

The figure above shows findings from the survey, by goods or services the respondents have reported they actually buy (corrected for those who have answered that they do not buy the product). The products are ranked from most to least widely used. The top products are those which the fewest have responded that they do not buy. The products which most people answered that they do not buy appear at the bottom of the figure.

Note that even though a large majority report that they do not have problems, there may be large groups which have great difficulty placing orders or effecting payment for a product. This applies to health services, for example, where 10 per cent report that they have had great problems in the past year, while 88 per cent considered the purchases to be problem-free. We cannot exclude the possibility that this is associated with payment systems at medical centres and hospitals, a matter the Norwegian Consumer Council has previously brought up with the Ministry of Health and Care Services. In its letter to the Norwegian Consumer Council dated 7 February 2017, the Ministry stated that all enterprises which provide health services and charge patients are under an obligation to accept cash payment.

The Norwegian Consumer Council is contacted regularly by consumers who report difficulties paying for health services. This applies to, inter alia, medical centres which do not accept cash and charge a billing fee if payment links sent by text with a short deadline are not used or if the centre's online payment solution is not used.

The figure also shows that it may appear to be difficult to apply for and pay for important welfare services like kindergartens, after-school programmes and social care services. The YouGov survey does not provide a clear explanation, but we cannot disregard the possibility that these findings may be linked to the secondary group's practical difficulties with gaining access to services. The findings from the survey indicate that this area should be studied further.

6.2 Possible problem markets

Based on the survey by the Norwegian Consumer Council alone, it is difficult to arrive at a clear conclusion as to why some markets appear to be less accessible to consumers. In general, the findings indicate that the problems are equally great in every market segment. However, there are indications that some market segments may be less accessible than others. There may therefore be reason to study these market segments in greater detail and make an assessment as to whether the systems for placing orders and effecting payment adequately protect consumers' rights to access.

Note the following:

- As many as 10 per cent of consumers in the health services market explicitly report that they had great difficulties placing orders or effecting payment in 2021. We cannot disregard the possibility that the answers are linked to what are already well-known and discussed challenges to consumers regarding payment systems at medical centres and hospitals, see section 6.1.
- The proportion that report that they have difficulty placing orders or effecting payment is also relatively high among users of public welfare services, such as social care services, kindergartens, day care and education.

7 The most difficult retail outlets to shop at

The retail outlets which are seen as being the most difficult to shop at are online shops or websites, online banks and public transport. Open-air markets, etc. are ranked in fourth place among retail outlets where there are problems.

When asked where they have problems placing orders or effecting payment, the responses vary considerably, depending on whether they are given by people who are able-bodied or who have some form of disability.

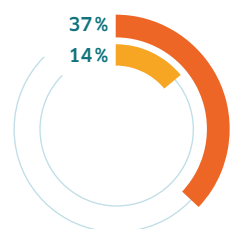
People with a disability report a high level of problems in open-air markets, retail outlets, etc. while people who are able-bodied have the most problems with online shops.

Problem arenas

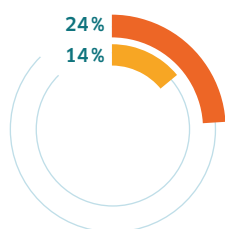
Among those who have struggled to obtain one or more goods and services, the majority report that they have had problems placing orders or effecting payment in online shops or websites, online banks and on public transport.

Public transport is ranked as third in terms of difficulty of access. It is worth noting that the market segment transport services is also described as difficult to access by 12 per cent of the primary target group and 28 per cent of the secondary target group (28 per cent have been unable to make a purchase or have had great difficulty during the past year).

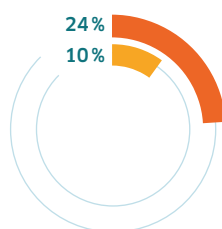
■ Have a disability
 ■ Does not have a disability



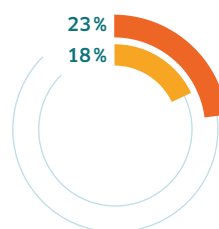
At open markets, farm outlets, flea markets etc.



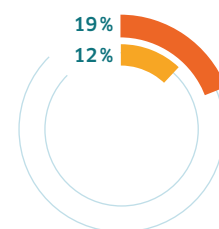
In stores and corner shops



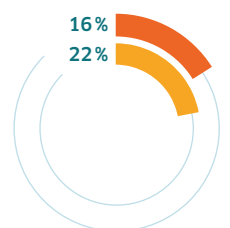
At charging stations and petrol stations



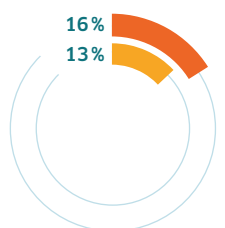
On public transport



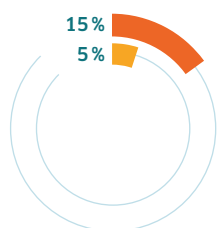
At restaurants and cafés



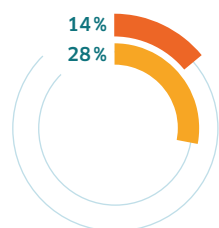
Using online banking



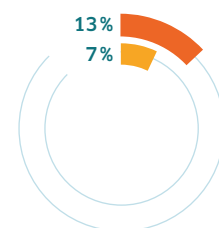
In public places



At concerts/events



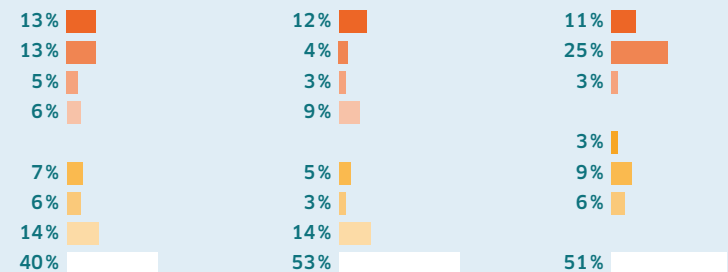
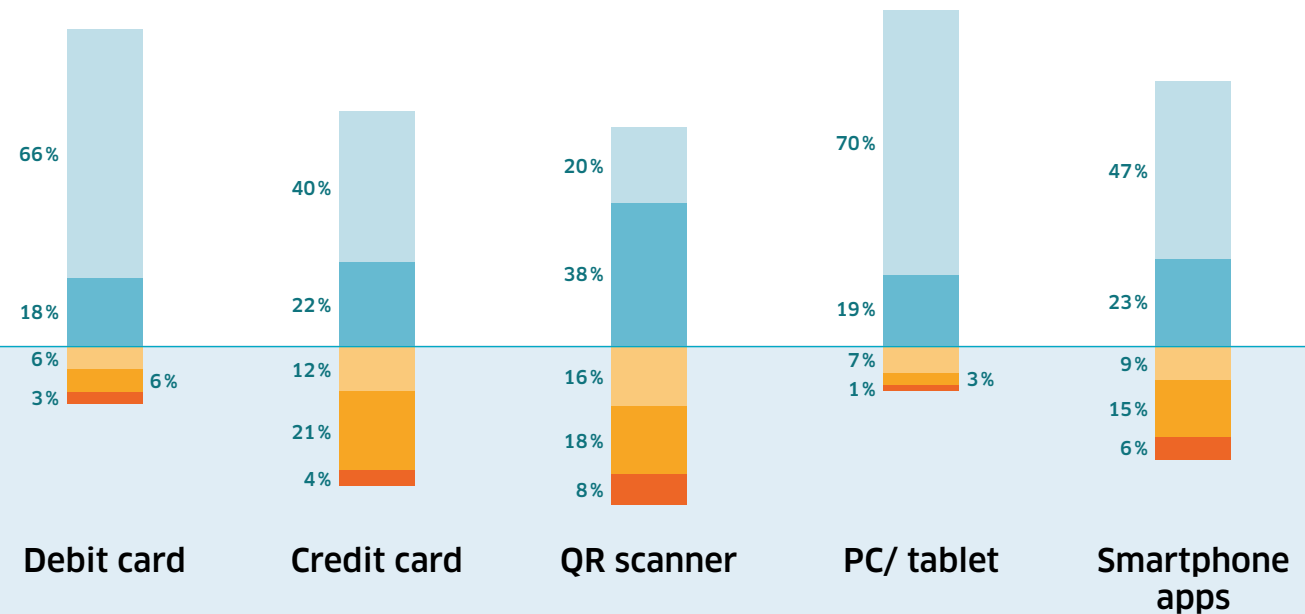
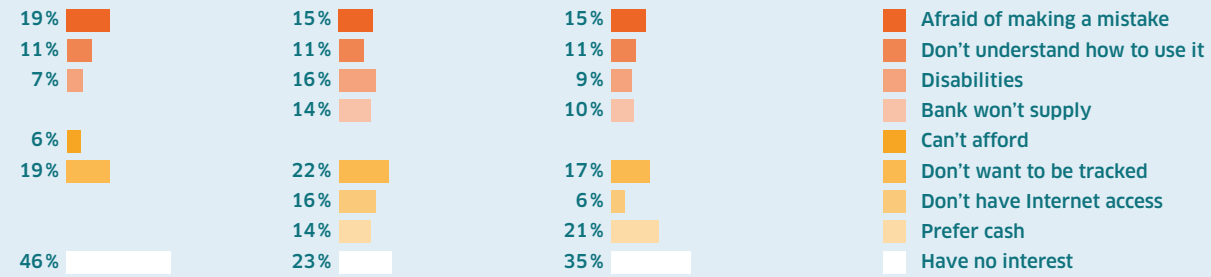
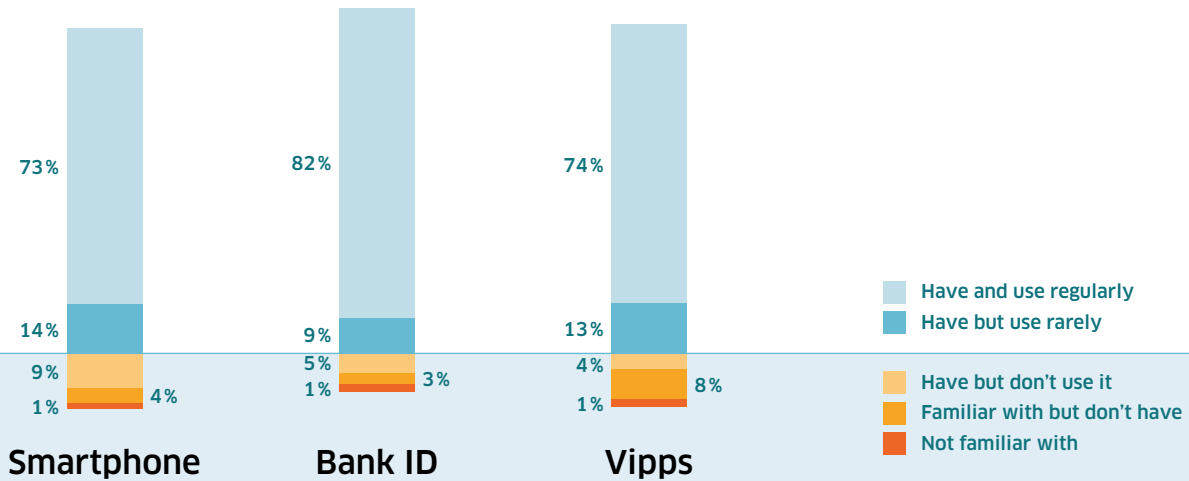
At webshops/websites



From private individuals

8 Missing tools

What is your relationship with the following tools for placing orders and effecting payment for goods and services?
Base=2016.



The results of the survey by the Norwegian Consumer Council show that most people both have and use the necessary software and hardware to make purchases, such as BankID, Vipps and smartphones. However, relatively large groups do not have these.

The answers indicate nonetheless that the groups that do not use, have or are familiar with key tools are large, even if they are in the minority.

For example, as many as 9 per cent of the respondents answer that they do not use BankID or are familiar with it. The corresponding figure for Vipps is 13 per cent and for smartphones it is 14 per cent.

Four per cent of the respondents state that they do not have access to BankID (3 per cent are familiar with it but do not have it, 1 per cent are not familiar with it). The figures for Vipps are 9 per cent, while 5 per cent do not confirm that they have a smartphone.

One per cent of the population aged 16 years and older is equal to 44 442 people. This indicates that the proportion of the population which does not have access to BankID is about 180 000 people, and that approximately the same proportion does not have a smartphone. The group that reports a lack of access to Vipps represents about 360 000 people.

8.1 Reasons given by consumers

When asked why they did not use different purchasing tools (order or payment), the respondents answer as shown in the figure above.

A lack of interest and skills and the fear of making mistakes are generally the main reasons given for not wanting to use the different instruments. Disabilities and lack of internet access are also given as a reason by many respondents. In relation to BankID, Vipps and credit cards, we also see that an important reason why people do not use them is that their banks do not give them access or they do not want to be tracked.

8.2 Lack of interest and skills

The respondents in the survey by the Norwegian Consumer Council report a lack of interest and

knowledge as the most common reasons why they do not use digital tools when making purchases. [The digital competence and participation of the population](#) were examined by Skills Norway in a major report published in 2021, based on a survey conducted in the autumn of 2020

The survey by Skills Norway points out that 14 per cent of the population do not use (3 per cent) the internet, smartphones, a PC or tablet or they use them to a limited extent (11 per cent). This means that about 600 000 Norwegians are 'non-digital'.

Naturally enough, the report from Skills Norway focuses on challenges that can be solved by improving the digital competence of the population. The report tends to largely describe digitalisation as a challenge related to individual skills. The report does not address other prerequisites for digital participation, such as access to telecommunications networks, hardware and software, although BankID and Vipps are mentioned as key tools which require digital competence. Another example of digital skills which (naturally enough) are not covered by the report from Skills Norway is the need to ensure compatibility between the necessary hardware and software, i.e. that hardware and software must be able to 'talk to each other', for example to use BankID as proof of identity, as mentioned in [this NRK article from 13 May 2022](#).

The report from Skills Norway also focuses on people over the age of 60 (seniors) and people outside the workforce or education (not economically active) who are considered to be at greater risk of becoming digital outsiders than the rest of the population. The hypothesis that these groups are at greatest risk is only partly supported by the Council's survey, which, among other things, shows that people aged 16–34 are over-represented among people with problems placing orders and effecting payment for goods and services, see section 9 below, and are thus at greatest risk of exclusion from consumer markets.

Nonetheless, the report from Skills Norway provides valuable information on the challenges that many consumers are facing.

Some findings from the report:

- Three per cent of the population aged 16 years and older do not use the internet or digital tools (smartphone, computer or tablet), while 11 per cent have poor basic digital skills.
- The group with the poorest digital skills generally consists of older people, people with a low level of education, people who live in rural municipalities, and people who are outside the workforce. Age, education and household income are the factors which best explain the variation in digital skills among the population.
- Digital skills and use of digital tools have increased within the population since 2007. We can see, however, that online security is an area in which many inhabitants still need to improve their skills.
- The population has many different wishes and obstacles associated with learning to use digital tools and services. One factor that prevents many of those who have the poorest digital skills from improving these is a lack of need or interest.
- The COVID-19 pandemic resulted in a greater need for digital skills among almost half of the population, particularly people who work and who are studying. Groups that have perceived such a greater need include seniors and people who are not economically active, two groups with poorer skills than the rest of the population, and whose needs are most underserved.

The surveys conducted by Skills Norway and the Norwegian Consumer Council have two different perspectives. They both corroborate and supplement each other in describing challenges in society. It is nonetheless important for the Norwegian Consumer Council to point out the following: If there is no access

to the necessary telecommunications networks, hardware and software, increased competence will have little impact on people's digital participation. Furthermore, different disabilities within the population, including those which are age-related, are likely to be a factor that must be taken into consideration permanently. This makes it less probable that all Norwegian consumers will ever be fully 'digital', regardless of their level of digital competence. See e.g. section 8.7 below regarding functional impairments.

'Doctors and specialist offices can be very finicky about how they want payment to be done, for example either only debit cards or invoices by text messages that must be paid within 24 hours, not cash or credit cards.'

8.3 When the market refuses to accept cash

A number of people who do not use digital tools report a preference for cash as the main reason. This applies to, inter alia, 21 per cent of the people who do not use Vipps. In principle, the use of cash when making purchases is a consumer's right.

According to section 3-5 of the Central Bank Act, Norwegian notes and coins are legal tender in Norway. Section 38 of the Financial Contracts Act states, inter alia, that consumers have the right to effect settlement with the recipient of the payment in legal tender and that the method of payment must not entail a substantial additional expense or other inconvenience for the payer. Nonetheless, in recent years there have been a number of cases of cash as a payment method either being denied or significantly restricted.

In May 2012, the Norwegian Consumer Council asked the Legislation Department of the Ministry of Justice about the extent of the principle of the right to payment using legal tender. The Ministry explained its assessments in its interpretive statement in April 2013. The statement can be summarised as follows (extract):

- In principle, the payer is entitled to pay in cash, and the recipient may demand payment in cash.
- Nonetheless, the expediency of cash payment may vary. In practice, payment obligations are therefore very often settled in other ways than through cash payment and increasingly so.
- Pursuant to section 38 subsection 2 of the Financial Contracts Act, the recipient of the payment may give further instructions concerning the method of payment, provided this does not entail a substantial additional expense or other inconvenience for the payer.
- Pursuant to section 38 subsection 3 of the Financial Contracts Act, a consumer is in all cases entitled to effect settlement with the recipient of the payment in legal tender, but the extent to which a consumer can demand to pay in cash must be determined on a case-by-case basis.
- Section 38 of the Financial Contracts Act cannot be set aside when entering into a contract that is detrimental to a consumer, see section 2 subsection 1. Consumers have the right to pay in cash, but the right may be limited to settlement 'with the recipient of the payment'. The settlement location can further be understood as the business location (main office) of the recipient of the payment.
- The recipient must offer the opportunity to effect payment in cash at its business location, but subsection 3 does not require that it be possible to effect payment in cash at all locations where a service is provided. In practice, this means, for example, that a consumer cannot demand to pay for a bus ticket in cash on a bus, but that the consumer may demand to pay for such a ticket in cash at the bus company's main office.

'It's very annoying that many places don't take credit cards and don't disclose that until you're going to pay. In addition, it's EXTREMELY annoying that some places don't take cash, even though in most cases, it's illegal not to do so.'

Norwegian Consumer Council has requested that the Ministry of Health and Care Services assess the legality of rejecting cash payment for health services in medical centres and hospitals. The background for this is that many patients in several locations have received invoices with high fees, which for many payers involve a substantial added cost and also violate section 38 subsection 2 of the Financial Contracts Act.

In its response letter to the Norwegian Consumer Council dated 7 February 2017, the Ministry of Health and Care Services stated that all enterprises that provide health services and demand payment from patients are obligated to accept settlement in cash. In its letter to the Norwegian Consumer Council, the Ministry noted that it would inform all the regional health trusts and county administrations about this, including the Norwegian Association of Local and Regional Authorities (KS).
Source: [Norwegian Consumer Council: Kort og kontant](#) [Cards and cash]

On 1 September 2022, the Ministry of Justice and Public Security sent a proposal to amend the rules on payment in the Financial Contracts Act with a view to strengthening the consumers' right to pay in cash out for consultation. The proposal says that in staffed, permanent business premises where business operators sell goods or services to consumers, the business operator must provide consumers with an option to pay for these goods or services in cash. In light of the special concerns that come to the fore in relation to payment for and access to passenger transport services, the proposal includes a regulatory provision that permits the

establishment of separate rules for such services. The deadline for submission of consultation responses has been set at 19 December.

Maintaining a system for the use of cash in retail trade is also a necessary element in households' crisis preparedness. Cash is included in the preparedness stockpile that the Norwegian Directorate for Civil Protection recommends all households to have at home, to be used for consumption during an emergency. Source: Advice on self-preparedness for emergencies (sikkerhverdag.no). This must also include well-functioning preparedness solutions for distribution of cash in situations where the demand for cash can be expected to increase because the electronic payment systems fail to function for various reasons.

Moreover, in association with the deliberations on the Financial Markets Report 2021, the Storting requested that the Government appoint a public commission to assess the role of cash in society going forward. In the Financial Markets Report 2022, the Government stated that it intends to appoint such a commission during 2022.

8.4 Unwillingness to be tracked

A large proportion of those who refrain from using digital tools state their unwillingness to be traced as the reason for this choice.

The greatest proportions of such responses come from those who report that they do not use BankID (22 per cent), smartphones and apps (19) and Vipps (17).

The digitalisation of consumer services has given rise to comprehensive commercial tracking, where one or more actors collect and use personal data for commercial purposes. This can include information on user behaviour with a view to developing new products or services, or to target marketing, map out behaviour or sell the information to third parties.

The Norwegian Consumer Council has previously shown how extensive commercial tracking takes place on websites and through apps on smartphones in ways that are all but impossible to avoid. The information collected can

be used to tailor advertisements and other messages, but may also represent a risk of comprehensive manipulation, commercial monitoring and even safety violations and identity theft.

A number of scandals involving abuse of personal data may also have helped give rise to 'cooling' effects among users (i.e. that users refuse to avail themselves of digital services out of fear of being registered and of their information being used for unlawful purposes). Other studies corroborate the Norwegian Consumer Council's findings, for example the personal data study undertaken by the Norwegian Data Protection Authority in 2019/2020, which showed that many consumers are so uncertain about the way in which private actors make use of personal data that they have refrained from making online purchases.

The processing of personal data is regulated through the Personal Data Act, which lays down a number of requirements intended to protect privacy and give consumers control of their own information. In practice, advanced technological and legal competence is required to understand and restrict, if relevant, this tracking.

'It's very frustrating that there are apps for everything. I don't want to cram my phone full of junk I use only once. I always pay, but I don't want everyone to be able to track me.'

8.5 Lack of access to BankID and Vipps

Four per cent of the respondents in the sample (the primary target group) do not confirm that they have BankID. This may indicate that the number of consumers older than 16 years who do not have BankID amounts to approximately 180 000 people. Fourteen per cent of those who report that they do not use BankID – equal to 9 per cent of the sample – state as the main reason that they are denied this identification tool by their bank.

The way retail trade systems have developed, not having BankID can represent a major problem for many consumers when they need access to the markets. Today, it is difficult for persons with no BankID to purchase goods and services online. People with no BankID will also face difficulties in accessing public services.

On 1 January 2021, Norwegian online shops in practice introduced BankID as a requirement for making purchases. The background for this change included requirements in the EU's revised Payment Services Directive (PSD2) for strong customer authentication when online purchases are paid for by card. Vipps AS, which develops and operates BankID, states that, in principle, the requirement for strong customer authentication in online commerce is not equal to a requirement for use of BankID, and most banks have (and must have) alternative solutions for those who are denied BankID.

8.5.1 THE SCOPE OF BANKID

On its website, BankID describes itself thus:

Today, 4.3 million Norwegians have BankID. BankID is used by all of Norway's banks, the public administration and a growing number of businesses in various industries. The Norwegian banks have developed BankID jointly, and the country's banks undertake customer due diligence and issuance of BankID to personal customers. Vipps AS operates and develops the service, and sells BankID to Norwegian businesses through its network of distributors.

Despite the dominant position that BankID holds as an electronic ID solution, BankID is not included in the so-called basic banking services in the financial sector. In the article 'How to get access to banking services in Norway' by Finance Norway, the following delimitation appears:

Norwegian banks offer various banking services. 'Basic banking services' are as a main rule available for everyone living in Norway,

irrespective of citizenship. Basic banking services include bank account, debit card [without a photo] and access to online banking. Other kinds of services, like loans, credit card, BankID etc., the bank can choose to offer after a risk assessment of the customer.

From the quoted passage from Finance Norway, it follows that a consumer will not be provided with the option to use BankID until the bank has

- undertaken a risk assessment of the person in question
- made a decision to issue BankID to this person

It follows from the conditions set by the finance industry for provision of BankID and Vipps that it is not sufficient to be resident in Norway or a personal customer in one of the country's banks to be able to access these very common solutions for identifying oneself and paying for purchases. Of all the common payment instruments, only a debit card without a photo is described by the industry as a basic banking service.

8.5.2 BANK PRACTICE

When banks consider offering BankID to their customers, they can to some extent apply different rules and procedures, but only within a common framework. BankID is regulated by the EU's eIDAS (electronic IDentification, Authentication and trust Services) regulatory framework, which has been implemented in Norwegian legislation since 2018. According to Vipps AS, the required procedures for granting BankID are mainly regulated by eIDAS. However, these procedures are also to some extent circumscribed by the requirements imposed on banks in terms on customer due diligence etc. in the Anti-Money Laundering Act and other laws and regulations that the banks need to comply with.

According to Vipps AS, the following framework applies to all procedures that the banks administer when granting BankID to their customers:

- The main requirement for obtaining a 'high' level eID is a passport or a national ID card.
- In addition, the rules and legislation require that this identity document be verified by physical attendance – as a rule at the bank's premises.
- The banks issue BankID to their own customers – i.e. a customer relationship with a bank that issues BankID is required.
- As the banks are subject to anti-money laundering legislation, the bank's customers also need to undergo know-your-customer processes (also known as KYC processes) pursuant to the legislation. This is the first stage of the risk assessment that the bank undertakes.
- The bank can also assess whether the customer will be able to comply with the requirements in the agreement on use of BankID. The banks assume great liability when issuing BankID to customers, and there is a considerable potential for abuse.
- As BankID is recognised across banks, there is also a joint set of legislation that all banks need to comply with when issuing BankID. Today, this legislation largely overlaps with the requirements in eIDAS and the Anti-Money Laundering legislation. One material restriction is the lower age limit of 13 years, but the banks can also set their own age limits to 15 or 18 years.
- Having a national ID number, i.e. a national identity number or a D number (preliminary identity number) is another requirement. In Norway, an eID without this information is largely irrelevant, since many of the services accessible through BankID or other eIDs use it as an identifier.
- In order to obtain BankID, the consumer must enter into an agreement with the bank, which also imposes certain obligations on the consumer. For people who are younger than 18 years and cannot enter into agreements on their own behalf, a guardian must therefore participate in the process.

'Doctors and specialist offices can be very finicky about how they want payment to be done, for example, either only debit card or invoice by SMS that must be paid within 24 hours, not cash or credit card.'

8.5.3 GROUPS THAT BECOME OUTSIDERS

Since the investigation by the Norwegian Consumer Council showed that lacking BankID and Vipps can create major problems for consumers, it is interesting to examine in more detail the kinds of groups that are denied BankID and the reasons for this denial.

Vipps AS states that no records are kept of individuals who are denied BankID and the reasons for this denial. In light of the rules and legislation and procedures, however, they expect the following groups to face challenges:

Foreign nationals without a Norwegian identifier (national identity number or D number): This group will face a number of challenges until a quicker issuance of D numbers or alternatively a separate number series is ensured.

- Foreign nationals with a Norwegian identifier: Some banks are more restrictive when it comes to issuing BankID to these groups. The reason could be that performing KYC processes is more difficult, and the bank may hence consider it too risky (or even illegal) to establish a customer relationship, or for other reasons.
- Persons who are unable to use BankID safely may face problems in obtaining BankID. These could stem from physical or mental challenges. In such cases, the banks will offer solutions to ensure that helpers have right of disposal.
- Persons under guardianship constitute a sub-category of the group above.
- Some young people may also face challenges in obtaining BankID, because this requires an agreement with the parents or a legal guardian.

In situations where the young person is in foster care or similar, obtaining a signature from the parents can represent a challenge. Young people whose parents are in conflict can also face challenges because a passport is a prerequisite, and this requires the parents to cooperate.

In the draft of a new strategy for eID in the public sector, which the Government sent on a consultation round on 20 June this year, the current situation is described as follows (pages 14 to 17):

Not all service user groups have obtained an eID at the high security level [...]. Many service user groups thereby face challenges in accessing digital public services that require log-in with the use of an eID with a high security level. This is a challenge to having digital solutions as the first choice for public services and can lead to digital outsidership for several user groups that risk not having access to digital public services that they are entitled to use or obligated to use. The needs analyses revealed that particularly older people, people with special needs and other non-digital users, and children between 12 and 15 years, as well as foreign nationals and asylum seekers, face challenges in obtaining and/or using an eID. [...]

Furthermore, the needs analyses revealed that some elderly people also may face challenges in obtaining an eID. For example, this may be because the bank considers them unable to use a BankID, such as when a family member contacts the bank on behalf of their parents. Similar considerations also apply to substance abusers who for various reasons cannot establish a customer relationship with a bank and therefore do not have BankID. Furthermore, it can be difficult to have an eID issued at the high security level for people with reduced functional ability, due to the market actors' assessment of the user's ability to enter into a BankID agreement. [...]

Many foreign nationals resident in Norway lack access to an eID with a high security level [...].

Although asylum seekers and refugees with a confirmed identity and valid ID documents in principle are eligible for obtaining an eID at the high security level, they often report that practices for issuing BankID vary from one bank to another, and that establishing a customer relationship can be difficult. People with a temporary residence permit in Norway and no valid ID documents have no opportunity for obtaining an eID and thereby have no access to online public services.

Moreover, people under guardianship will not be able to obtain BankID. Nor do their guardians appear to be able to make purchases with BankID or their behalf. In the proposal for a new national strategy for eID from the Government, it is stated that the Norwegian

Digitalisation Agency has initiated work on a project concerning an authorisation register (FUFINN29). This will partly address the need for user-friendly digital authorisation solutions that enable access to public services on behalf of another service user.

It is also highlighted that 'the lack of digital authorisation solutions causes relatives or guardians of older people, people with special needs and non-digital service users to face major challenges in meeting the needs of their ward or the person with special needs'.

8.5.4 PREREQUISITES FOR USE OF VIPPS

Having BankID is also a prerequisite for using Vipps, which currently is a widely used payment instrument in the consumer markets.

The prerequisites for obtaining Vipps from a bank are described in detail at Vipps.no as follows:

- BankID or BankID on your mobile
- A Norwegian national identity number or a D number – provided that your bank issues BankID to people with a D number.
- A Norwegian mobile phone number
- An address registered in the National Population Register
- A Norwegian Visa card or Mastercard
- An account in a Norwegian bank
- An email address

'[...] very cumbersome that there's not a single entry to all public records. As it stands, you have to authenticate with BankID a number of times if you want to perform an action that includes several services. BankID authentication should not have been entrusted to a PRIVATE service but should have been operated directly by the state.'

8.5.5 FUTURE SOLUTIONS THAT ARE BEING CONSIDERED

An eID issued by the authorities at a high security level is among the measures that are proposed for consideration in the Government's proposal for a new eID strategy. The proposal highlights that this will be important to achieve the objective that all citizens who are able to do so should communicate digitally with the public sector. The solution will represent a supplement to privately-issued eIDs such as BankID, Buypass and Commfides, as well as an alternative for those who have no eID at the high security level already. In principle, this is intended as a solution to ensure that consumers have access to public services. It is not intended for use in commercial consumer markets.

In its consultation response, the Norwegian Consumer Council underscored the importance of implementing this measure, while pointing out that a public eID must be developed and issued in accordance with prevailing data protection rules and legislation. In addition, the Norwegian Consumer Council pointed out that a public eID must not

cause public services and information to be placed behind a log-in wall to an unnecessary extent, cf. the description of cooling effects in section 8.4 above.

Introduction of a central bank digital currency (CBDC) is currently being assessed by Norges Bank, but it seems yet unclear whether the central bank's solution will require electronic identification. The central bank underscores that a CBDC will not be offered in the short or medium term. In the third report from the working group for a CBDC it was proposed, for example, that a CBDC be managed by Norges Bank and remain technologically independent of the private banks' systems. Moreover, the working group highlighted how certain population segments can face challenges in using electronic payment systems, and that this should have consequences for the choice of technology. In addition, the working group also noted that tourists and others who stay in Norway temporarily should be able to use the CBDC.

8.6 Lack of internet access

A large proportion of those who report that they do not use digital tools to place orders and effect payment state lack of access to the internet where they live or make purchases as the main reason. This applies to, for example, 16 per cent of those who do not use BankID.

For consumers to be able to order or pay for goods and services online, it is essential to be located in an area with good coverage or to have sufficient bandwidth capacity at the moment of purchase in the places where they normally circulate and stay.

There is a need for a closer assessment of the download capacity required today to enable a consumer to undertake normal purchases, such as ordering or paying for a bus ticket with an app, making an online purchase or using online banking services. The Norwegian Communications Authority (Nkom) regards 100 Mbit/s as the lowest standard limit.

In its statistics on electronic communications, Nkom reports that the degree of coverage for at least 100 Mbit/s was 95 per cent or more in densely built-up areas, whereas the equivalent proportion was 65 per cent in sparsely populated areas. Nationwide, 90.4 per cent of households have the option of broadband with a download capacity of at least 100 Mbit/s. Accordingly, 9.6 per cent do not have this option, equal to an estimated 241 000 households. More than 164 000 of these are located in sparsely populated areas.

The committee that presented the green paper NOU 2021: 4 Norway towards 2025 recommended an upgrade of the digital infrastructure, in line with the European Commission's objective that all households and businesses should have access to broadband with a capacity of 100 Mbit/s as a minimum. Sweden has set itself a more ambitious goal, seeking to ensure that 98 per cent of the population has access to at least 1 Gbit/s by 2025.

8.7 People with impairments

The survey included questions about why the respondents do not use the various payment instruments, and we assumed that functional impairments could be the main reason. Five per cent stated functional impairment as their main reason for not using the various payment instruments. Note, however, that the 5 per cent proportion in the survey does not represent an accurate picture of the scope of functional impairment in Norway in general; it shows those who report challenges in purchasing goods and services as a result of functional impairment.

Sixteen per cent of those who do not use BankID and 9 per cent of those who do not use Vipps report a disability or functional impairment as the main reasons. Seven per cent of those who do not use a smartphone state functional impairment as the main reason.

According to the Norwegian Directorate for Children, Youth and Family Affairs, the number of people with functional impairments varies somewhat from one year to the next, and amount to 15–18 per cent of the population aged 15–66 years according to the definition used in Statistics Norway's labour force survey. In 2020, this proportion was 18 per cent, equal to approximately 636 000 persons. Earlier surveys undertaken by YouGov indicate that approximately 20 per cent of the population suffer from some form of disability. It seems reasonable to assume that the proportion of consumers with various functional impairments will remain relatively constant over time.

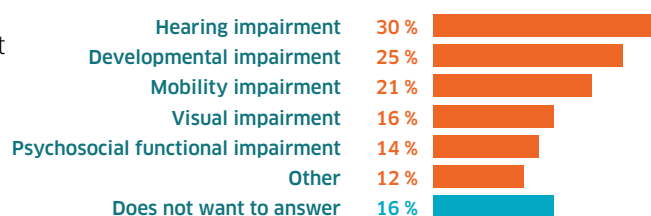


Figure: Index persons having trouble ordering or paying for goods and services.

'Confirming by SMS is a problem for people who don't see well or have poor motor skills.'

9 Who are the outsiders in the consumer markets?

The study by the Norwegian Consumer Council shows that in total, as many as 38 per cent of the respondents in the primary target group report that they have had problems ordering or paying for one or more goods or services over the past year.

The group that reports encountering problems is too large for us to be able to meaningfully identify clearly defined sub-groups that risk facing lack of access to goods and services.

The large proportion of consumers involved indicates that there is a need for more wide-ranging measures to change the situation in the consumer markets.

The proportion of 38 per cent of the respondents is distributed as follows:

The figure shows indices, and numbers greater than 100 tell us that a group is overrepresented when compared to the average. We were surprised by finding that younger people most frequently report that they have problems ordering or paying for goods and services.

It is difficult to give a more precise explanation of the reasons for this on the basis of the available quantitative data, but we cannot exclude the possibility that this is related to the banks' practices for issuing BankID to people younger than 18 years, cf. section 8.5.2.

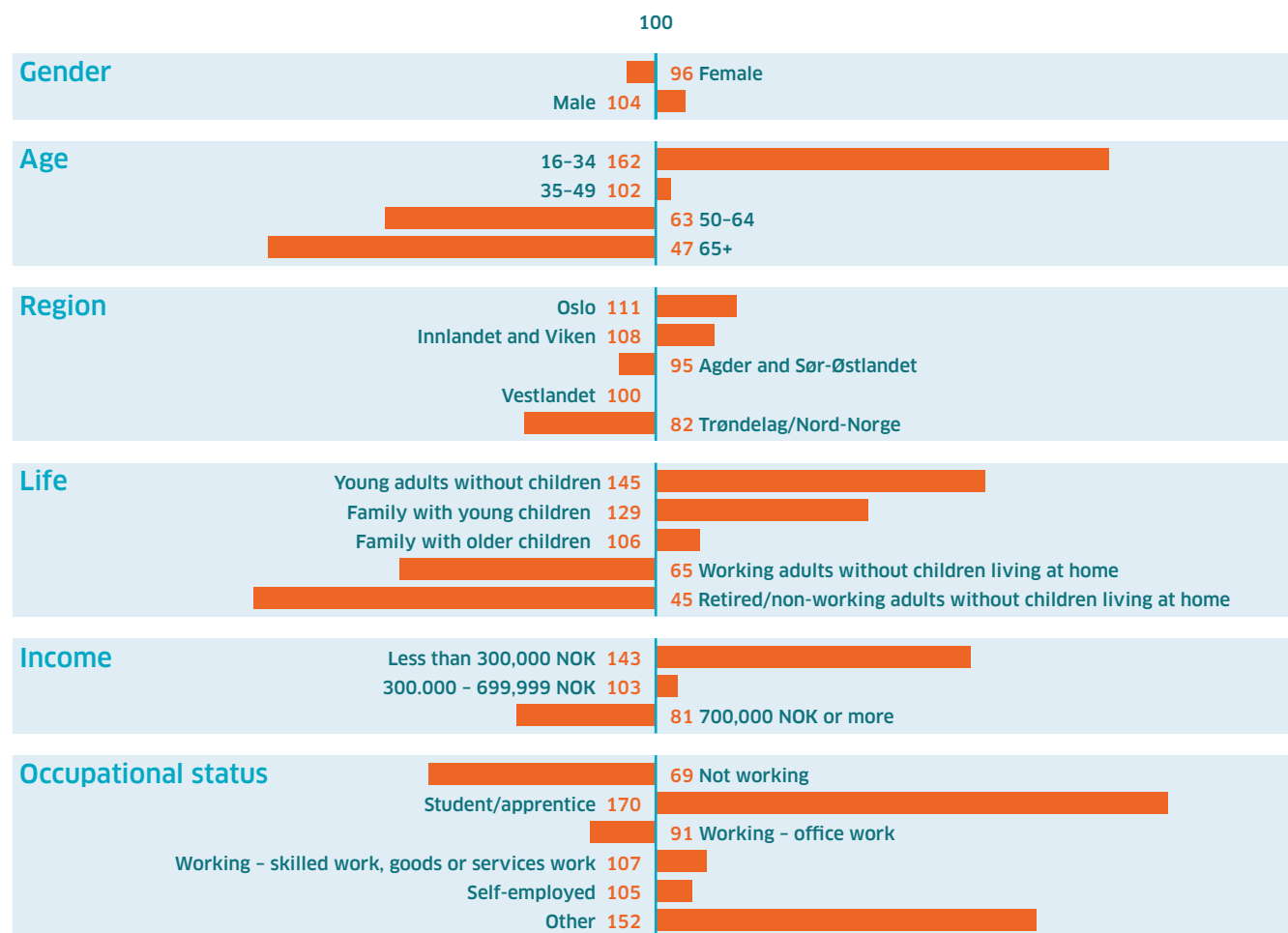


Figure: Index persons having trouble ordering or paying for goods and services.

The secondary target group

Fifty-three per cent of the respondents in the primary target group report that they do not help others, and 4 per cent prefer not to answer. This leaves us with 43 per cent who report that they help someone with ordering or paying for goods and services on a regular basis. This is a formidable proportion. When it is multiplied with the number of people in Norway who are 16 years or older, it indicates that nearly 1.9 million Norwegians help someone order or pay for goods or services on a regular basis.

Those who report that they help others on average provide help to 1.5 persons each. Those who receive help from people in the primary target group are defined as the secondary target group.

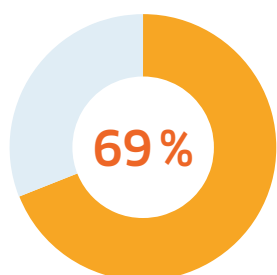
Key figures for the secondary target group are given in the graph below.

It is natural that the proportions are higher than their equivalents in the primary target group, but the difference between the primary and secondary target groups (the latter consisting of those whom the primary group helps order or pay) is not as large as we might expect.

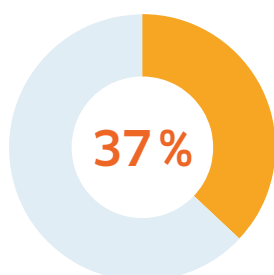
In the graphs below we have collated information on the use of various tools that the secondary target group uses to place orders or effect payment. Unsurprisingly, there are many more here than in the primary target group who do not use the various tools. Note especially that as many as 23 per cent of the secondary target group are non-users of BankID, and as many as 27 per cent are non-users of Vipps.

Why does the secondary target group not use the ordering and payment tools?

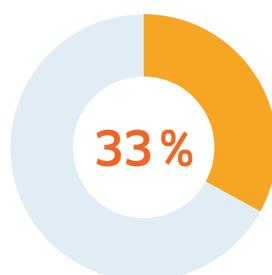
Lack of interest seems to be the most common reason for not using the tools that often are needed to make purchases (ordering or paying) also in the secondary target group.



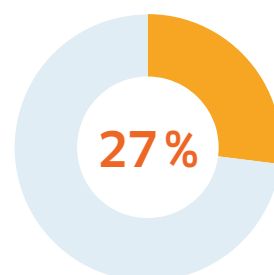
Have trouble buying goods and services



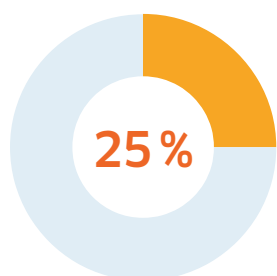
Do not use smartphone apps



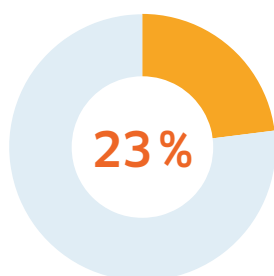
Do not use QR scanners



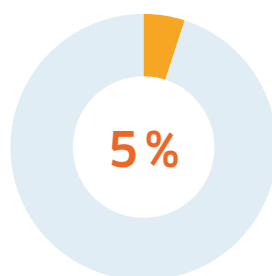
Do not use Vipps



Do not use PC/tablet with internet access



Do not use BankID



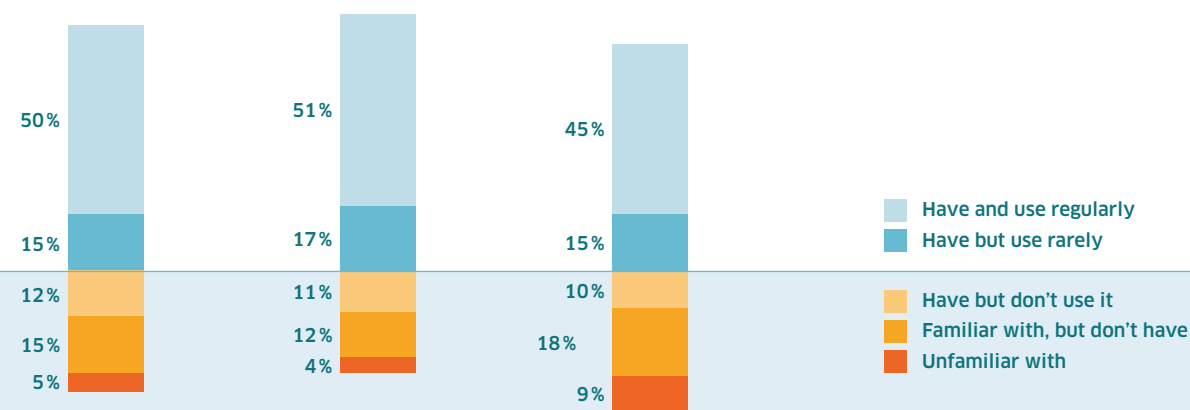
Do not use digital aids due to disabilities

It is worth noting that disability or functional impairment are the most common reasons why people in this target group have no smartphone.

Lack of access to broadband is also a relatively frequent (8-16 per cent) reason why they do not use common digital instruments to make purchases.

As in the primary target group, approximately 14 per cent of those who do not use BankID report that they have been denied this tool by their bank.

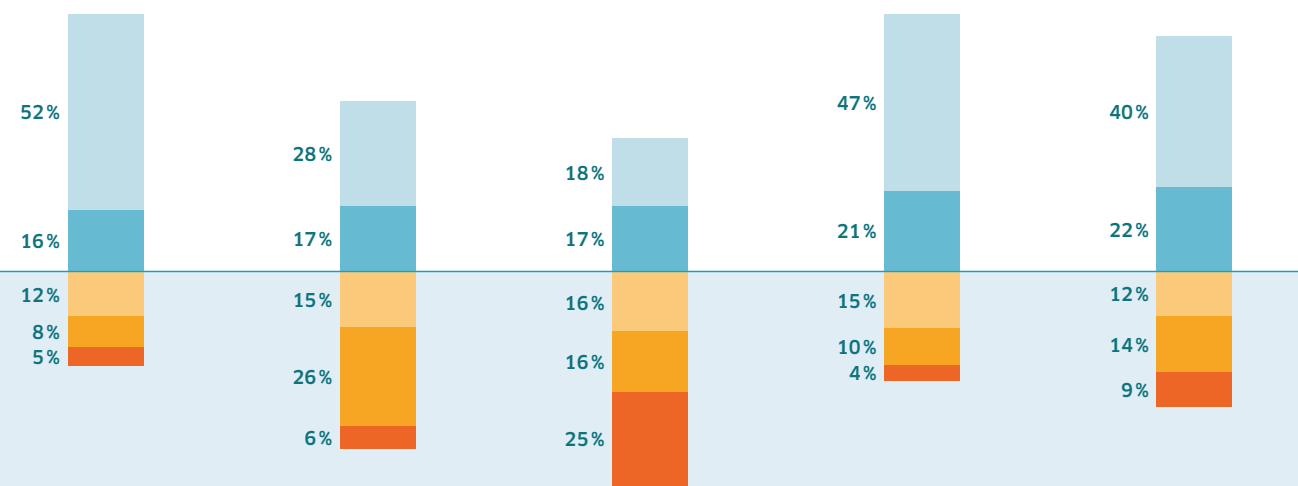
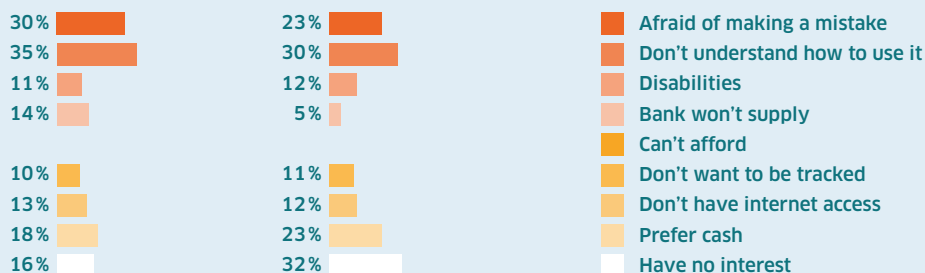
The reasons why the secondary target group does not use the various tools are distributed as follows:



Smartphone

Bank ID

Vipps



Debetkort

Kredittkort

QR-kodelesar

**PC/
nettbrett**

**Appar på
smarttelefon**

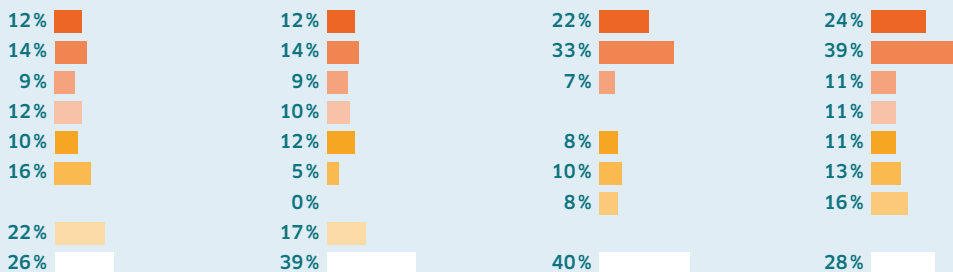
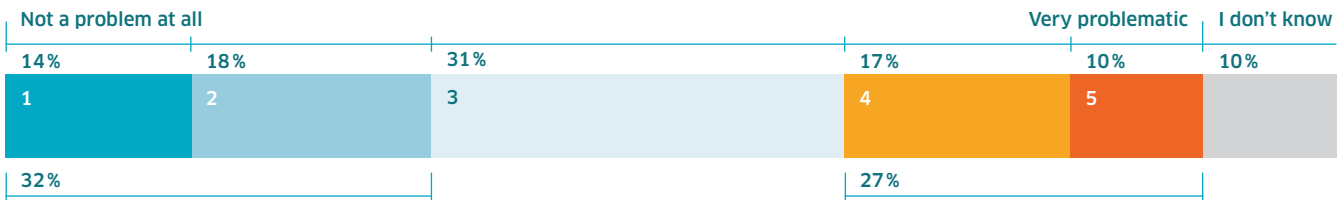


Figure: What is the person's relationship to the following aids to order or pay for goods or services? Base=832.

10 How is outsidersness experienced in the consumer markets?

The respondents who reported access problems were asked to grade these in terms of how problematic this has been for them. Only 14 per cent answer that they have not perceived it as a problem, while 27 per cent answer that the problems they have faced in making purchases have been somewhat or very problematic.



Finally, people in the primary target group have conducted interviews of a more 'qualitative' nature with the people in the secondary target group whom they help with making purchases. Approximately 370 such interviews were conducted. Of these, approximately 100 were rejected due to unsatisfactory quality.

The main impression is that the group has particularly had problems obtaining bus tickets and accommodation, as well as with parking. Some answered that they were denied access to the bus driver and told to use an app, and this made it difficult or impossible for them to make the purchase. Network problems and downtime have constituted additional problems.

Below are some examples of free-text answers from these interviews, and these can be interesting since they give more detail about how the person experienced the circumstances around and the effects of being unable to purchase a needed good or service.

'[...] very cumbersome that there's not a single entry to all public records. As it stands, you have to authenticate with BankID a number of times if you want to perform an action that includes several services. BankID authentication should not have been entrusted to a PRIVATE service but should have been operated directly by the state.'

'It's virtually impossible to pay on buses, trams, light rail, and trains without a smartphone with an app. Being able to pay for subsidised public transport with money, a bank card or a topped up travelcard should be a given. Requiring everyone to have a smartphone with an app to travel by public transport is essentially discrimination.'

'I think the information on various websites on how to pay if you don't have the necessary apps/cards etc. isn't good enough. Or what to make of payment on public transport and similar altogether.'

'I get debt collection notices because I can't pay in cash or with a card at the doctor's.'

'Doctors and specialist offices can be very finicky about how they want payment to be done, for example, either only debit card or invoice by SMS that must be paid within 24 hours, not cash or credit card.'

'I was trying to pay for a piano concert upfront. I wasn't able to pay, and as a consequence, I missed the concert.'

'I don't like the QR system, and I don't like Vipps. My smartphones usually aren't any good.'

'Confirming by SMS is a problem for people who don't see well or have poor motor skills.'

'It's very frustrating that there are apps for everything. I don't want to cram my phone full of junk I use only once. I always pay, but I don't want everyone to be able to track me.'

'It's very annoying that many places don't take credit cards and don't disclose that until you're going to pay. In addition, it's EXTREMELY annoying that some places don't take cash, even though in most cases, it's illegal not to do so.'

'I'm suffering from PTSD and can't get out of the house due to my anxiety. After banks started requiring a passport to give their customers BankID and many online stores started requiring BankID to shop, my life has become a nightmare!

Not being able to buy the essential things I need any more makes me feel helpless, small, and worthless, and I wish I died so I wouldn't bother people any longer.'

It seems many people experience lack of access to goods and services in the consumer markets, and they view this as more than moderately problematic. There were also reports that this kind of exclusion from regular daily activities felt very alienating.

11 Conclusions

Access to important goods and services is a consumer right that has been adopted by the UN General Assembly. This consumer right means that consumers in practice shall have access to goods and services that are produced by both public and commercial enterprises.

The report from the Norwegian Consumer Council shows that the vast majority of consumers usually have no problems in placing orders and effecting payment. For them, it is natural to consider digital tools and solutions for placing orders and effecting payment a consumer good. Access to new technology makes daily life easier and products and services more accessible. This applies to 75–90 per cent of the consumers in the various market segments.

On the other hand, the proportion of consumers who report having faced major problems in placing orders or effecting payment over the last year, or having been unable to do so, is nevertheless large when seen in a consumer perspective. The report documents that as many as 38 per cent of the respondents report that they have met with major problems in placing order or effecting payment, or to have been unable to purchase one or more goods and services. The fundamental rights of these consumers have therefore not been upheld.

Consumers who are excluded from the online purchase channels include not only people who are older and who have a disability, but also young people. Nearly one-half of consumers are needed to help them, and many of those who provide help are also sometimes unable to make purchases.

When consumers do not possess the tools required to use markets, this may lead to exclusion from common social activities and it may impact on welfare in society in several ways. Since this lack of access is partly caused by technological obstacles, it is often referred to as digital outsidersness. In addition, certain legal and insti-

tutional conditions, in combination with technological factors, may also cause consumers to be excluded from markets.

The report shows that this applies to a large proportion of consumers. The study also indicates that the challenges are virtually identical in all market segments. Broad-ranging measures that encompass all market segments are therefore needed. These measures should ensure that consumers have access to goods and services from both public and private providers.

We need to combat outsidersness in the consumer markets

Technology can help reduce barriers, but the report shows that technology can also create new barriers. The solution thus will not always be more technology, but better and in some cases even less technology where this is required to ensure general access to important consumer markets. The large number of people who help others place orders and effect payment points to a need for digital solutions that are better designed and planned, and that there is a need to ensure that the technology is more inclusive and universally designed.

Increasing digital competence in the population

The study conducted by the Norwegian Consumer Council shows that lack of interest and competence and the fear of making mistakes are the main reasons that consumers cite for not using digital instruments for placing orders and effecting payment. The Norwegian Consumer Council is pleased that Skills Norway has been tasked with raising the level of digital skills in the population and promoting digital inclusion. The authorities have thereby taken the responsibility for a targeted and coordinated effort that will benefit consumers.

Access to order and payment instruments

The Norwegian Consumer Council is nevertheless concerned that technological and partly institutional and legal obstacles to digital participation seem to have been established in consumer markets, and by how these obstacles affect many people in various ways. It is important that such distortions be rectified.

If consumers have no access to the required networks, hardware and software, improved digital skills will not have a major effect on the digital participation of consumers.

It is important both in the short and long term to avoid marginalisation of groups of consumers who are unable to obtain important goods and services because they have no access to the instruments they need to place orders and effect payment. Such access also have a bearing on the emergency preparedness of these consumers.

Access to cash payment

A number of those who do not use digital tools report a preference for cash payment as their main reason. This applies to, inter alia, 21 per cent of those who do not use Vipps. According to prevailing legislation, paying for purchases in cash is in principle a right for consumers.

Maintaining systems for the use of cash in retail trade is important also for reasons of emergency preparedness. For example, cash is included among the items that the Norwegian Directorate for Civil Protection recommends every household to keep in their preparedness stockpile for use in an emergency. This also implies a need for well-functioning preparedness solutions for distribution of cash, since the demand for cash can be expected to increase in cases where the electronic payment systems fail to work for various reasons.

This notwithstanding, in recent years we have seen a number of examples of how using cash as a means of payment has been refused or significantly restricted. In the qualitative interviews, there were reports of examples where payment for such items as bus tickets and parking was difficult both digitally and with cash. It is important to avoid a further marginalisation of cash as a means of payment.

National eID

Today, having BankID as an electronic identification solution is required in practice for consumers to access public services and health services, as well as for purposes of all online commerce. However, for reasons including the requirements imposed on banks by the Anti-Money Laundering legislation, not all consumers can have BankID issued by their bank. Not all those who are entitled to public services can thus obtain BankID. This gives rise to a need for the authorities to develop an alternative eID with the highest level of security and for it to be subject to democratic control.

Access to broadband

As a result of the digital developments, a growing proportion of the trade in goods and services takes place using digital tools. For consumers to be able to participate in the consumer markets, they need access to broadband that enables them to order and pay for goods and services online at the moment of purchase. Access to broadband with sufficient capacity at competitive prices is such necessary infrastructure.

Discrimination

Sixteen per cent of those who do not use BankID and 9 per cent of those who do not use Vipps cite disability or functional impairments as the main reason. Seven per cent of those who do not use a smartphone cite a disability as the main reason. This, as well as certain conditions associated with the criteria the banks apply when issuing BankID, gives rise to the question of whether the current systems for placing orders and effecting payment comply with the provisions in the Equality and Anti-Discrimination Act. The Act states that discrimination on grounds including functional impairment, ethnicity, age etc., or a combination of these grounds, is prohibited.

The limits for discrimination in the current systems for placing orders and effecting payment should be concretised in light of the provisions in the Equality and Anti Discrimination Act.

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