

Consultation response form

Please complete this form in full and return to futureofnumberingteam@ofcom.org.uk or:

Future of Numbering Team
Ofcom
125 Princes Street
Edinburgh, EH2 4AD

Consultation title	Future of Telephone Numbers
Full name	
Contact phone number	
Representing (delete as appropriate)	Organisation
Organisation name	DWP (Department for Work and Pensions)
Email address	

Confidentiality

We ask for your contact details along with your response so that we can engage with you on this consultation. For further information about how Ofcom handles your personal information and your corresponding rights, see [Ofcom's General Privacy Statement](#).

Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.	Nothing
Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.	None
For confidential responses, can Ofcom publish a reference to the contents of your response?	Yes

Your response

Question	Your response
<p>Question 2.1: We have set out developments in voice telephone services that are important in shaping our review of the future use of numbers to promote consumer confidence. Do you agree that these are the key considerations? Do you have any comments on our analysis of these developments? Are there any other developments or considerations that should be part of shaping this review, and if so, in what way?</p>	<p>Confidential - No</p> <p>DWP has not responded to all aspects of the consultation. We support the overall principles of this consultation, to promote consumer confidence in voice telephone service / numbers, and have responded to the questions in which we have an interest.</p>
<p>Question 3.1: What are your thoughts on the ability to dial local numbers from a landline without the area code? Do you think the local dialling facility has value?</p>	<p>Confidential - No</p> <p>The removal of local / geographic numbers may impact DWP's older customers, the less digitally able and the most vulnerable. It is likely that customers in these demographics have greater confidence in accessing our local services through telephone numbers with local area codes. This scenario is referenced in Ofcom's own research. These citizen groups in particular may need support with any changes to telephone number structures and the implications of it.</p> <p>If the proposed changes are implemented Ofcom will need to consider development of a national communications campaign. National organisations with national business delivery models, such as DWP, will need to work in tandem with this and develop their own communications for customers and staff.</p> <p>All telecoms suppliers will need to follow the same approach, regardless of service provider or network, to ensure a consistent and clear approach that does not unduly impact customer service or business delivery.</p>

<p>Question 3.2: Do you think local dialling should be closed on an area by area basis as required to increase number supply or across the whole of the UK at the same time? Why do you think this?</p>	<p>Confidential - No</p>
<p>Question 3.3: Do you have any views on allowing telecoms providers to make individual decisions on whether to provide customers with the ability to dial local numbers from a landline without the area code?</p>	<p>Confidential - No</p> <p>In our view, the changes proposed would affect national organisations and services. Telecoms suppliers will need to follow the same approach, regardless of service provider or network, to ensure a consistent and clear approach that does not unduly impact customer service or business delivery.</p> <p>There is the potential for confusion amongst citizens, in particular those less digitally able, if there is disparity and an inconsistent approach amongst telecom providers.</p>
<p>Question 3.4: For telecoms providers, what are your thoughts on the ability to implement the closing of local dialling in all UK area codes simultaneously?</p>	<p>Confidential – Not applicable, for telecom providers only</p>
<p>Question 3.5: For telecoms providers, what are your views on the technical feasibility of providing local dialling to customers when offering an IP-based voice service?</p>	<p>Confidential – Not applicable, for telecom providers only</p>
<p>Question 3.6: What do you consider are the important factors about geographic numbers? For example, is it the information they provide about the caller/called party? Is it familiarity, trust or confidence in call cost?</p>	<p>Confidential - No</p> <p>Whilst DWP does use national 0800 numbers, we are conscious that local / geographic numbers have become a familiar and trusted way for DWP's customers to contact us by telephone.</p> <p>DWP continues to use geographic numbers in its Jobcentre network, we</p>

	<p>believe customers understand that these numbers have associated call charges and are comfortable using them.</p>
<p>Question 3.7: What are your thoughts on retaining area codes in geographic numbers? Do you think location significance in geographic numbers has value and should be preserved? If so, why? How might your view change over time?</p>	<p>Confidential - No</p> <p>Removing geographic numbers could potentially have an impact on our older customers, those less digitally able, and the most vulnerable. Customers in these demographics have greater confidence in accessing our services through telephone numbers with area prefix codes. They may need support with any changes to telephone number structures and the related implications.</p> <p>Within the DWP Jobcentre network local / geographic contact numbers are used to enable customers to contact their Work Coach. Our local numbers operate alongside our national numbers and digital channels. This approach provides a cohesive service, giving customers the options of self service and direct contact.</p> <p>Whilst DWP is focused on digitising many aspects of our services, a small number of services continue to use fax machines for specific business transactions. These utilise local numbers, so there is potential for impact on these services. However, these services are anticipated to reduce over time.</p> <p>An aspect for consideration is whether the removal of local area codes would affect how customers search for and obtain information on local services. Location data is a key component to search engines such as Google. Is the use of local numbers on devices part of algorithms for providing citizens with effective search responses?</p>

Question 4.1: What are your thoughts about 084 and 087 numbers? What are the benefits and/or disadvantages of contacting an organisation by calling an 084 or 087 number? Can you tell us of any experience you've had calling these numbers? Have you expressly chosen not to call a service that uses these numbers? If so, what led to that decision and how did you choose to make contact instead (if you did)?

Confidential - No

Our primary concerns are that DWP customers are highly likely to be unaware of costs associated with calling non-geographic 084 and 087 numbers, and the potential harm this does to those who are amongst the most vulnerable.

Research by Ofcom and the PSA (Phone-paid Services Authority) points towards customer confusion about the different chargeable elements of non-geographic numbers. Some participants singled out 084, 087 and 09 as 'premium' and tended to assume that these numbers were costlier than the actual maximum rates allowable. Awareness and understanding of access charges and service charges was poor.

DWP has encountered issues with ICSS (Information, Connection and Signposting Services) and their use of non-geographic numbers. The main issue is that when a DWP customer rings an ICSS number they may not be aware that they are connecting with DWP through an unofficial third party and that they will incur call charges.

Citizens must be made aware of the point from which any call charge applies and the price range of the charges (*i.e.* both access and service charges). They should also be given a clear opportunity to accept the potential call costs. Acceptance of the call costs should not be assumed if the citizen takes no action.

Insight into the impacts that non-geographic numbers can have on DWP customers has prompted us to increase our engagement with other Government departments and build relationships with them. We have submitted responses to

	<p>PSA and Ofcom consultations on ICSS and illustrated the potential for harm to vulnerable customers.</p> <p>However, we still feel more can be done, particularly in regards to citizen awareness of what 084 / 087 non-geographic numbers are and understanding how the charging structures operate for citizens and DWP customers.</p>
<p>Question 4.2: We are interested in hearing from people who use 084 or 087 numbers as a contact telephone number. If you use one of these types of numbers as a means of contacting your service, why did you choose to do so? What do you think about using these numbers in the future?</p>	<p>Confidential - No</p> <p>In October 2017 the DWP moved the majority of their non-geographic and 0345 / 0845 numbers to 0800 Freephone numbers. The principle aim of this change was to reduce the costs for citizens and customers. This made DWP numbers distinct from ICSS numbers and non-geographic numbers, as well as free to call.</p> <p>Despite the change we are aware of situations in which customers have been misled into phoning 084 / 087 numbers. We believe that many customers are not aware of how non-geographic numbers work, their call charge structure, and the potential for incurring significant and unnecessary call costs.</p> <p>Customers must be made aware of the point from which any charge applies, the price range of the charges (<i>i.e.</i> both access and service charges), and they should be given a clear opportunity to accept the potential call costs.</p>

<p>Question 4.3: For telecoms providers, we are interested in hearing from providers that offer services on 084 and 087 numbers to their customers. If you do, can you provide some examples of use cases? What benefits do you offer to organisations in using 084 and 087 numbers rather than other numbering options? For originating providers, do you have any customer experience of attitudes towards and views on calling 084 and 087 numbers that you can share?</p>	<p>Confidential – Not applicable, for telecom providers only</p>
<p>Question 4.4: Are there changes to 084 and 087 number ranges that you think Ofcom should consider proposing to address the concerns highlighted in the research summarised in paragraphs 4.17 to 4.26?</p>	<p>Confidential - No</p> <p>DWP agree with the principles proposed.</p> <p>If these proposals are implemented in tandem with the PSA’s Special Conditions proposals, there will be a significant strengthening of regulations. This will contribute to the protection of all customers, including the most vulnerable groups.</p> <p>We believe there is potential for citizen confusion about the different elements of non-geographic number call charges. As stated in the recent PSA consultation on ICSS Special Conditions, DWP’s view is that before citizens incur call charges there should be an alert about the call charges and that the citizen must undertake a positive action to accept them. Acceptance of the call charges should not be assumed if the citizen takes no action.</p> <p>When changing the national telephone number ranges consideration may be required into how Ofcom protects organisations against cloning and spoofing within new number ranges.</p>

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