

NSPCC

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Selina Chadha

Ofcom
Riverside House, 2a Southwark Bridge Road
London SE1 9HA

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Dear Selina

NSPCC's response to the consultation reviewing the telephony universal service obligation

NSPCC welcome the opportunity to respond to Ofcom's consultation 'Review of the telephony universal service obligation'.

The NSPCC, which includes Childline and the NSPCC helpline, plays a key role in stopping child abuse and neglect in the UK. Our helplines are free resources and are a key tool in our mission to protect children.

Children and young adults know that by contacting Childline, they can speak to a counsellor about any topic they want without judgement. In the year to April 2020, Childline delivered over 61,000 thousand counselling calls with children and young people.¹ Childline also offers online chat and email counselling.

As Ofcom's consultation document states, 25,000 calls were made to Childline from Public Call Boxes (PCBs) in the year to April 2020.² This equates to 3.7% of the total calls made to the helpline.³ Given that this is a significant figure, it is, therefore, very concerning that Ofcom are altering the universal service obligation which will in turn reduce the number of phone boxes from 21,000 to 5,000 (a 76% reduction.)

Although we do not collect data on the devices which children call Childline from, we expect that Children may choose to call from a payphone because they are concerned about their privacy. This is especially important in cases where children may be victims of sexual abuse or neglect, including in cases where abuse is happening in a domestic context.

Our response focuses on ensuring that children have access to the relevant resources to contact Childline or other emergency helplines. As such, we do not answer all the questions in the consultation document.

¹ NSPCC figures: Total substantive phone calls to Childline which resulted in a counselling session. Between May 2019 and up to and including April 2020

² Ofcom (2021), https://www.ofcom.org.uk/_data/assets/pdf_file/0025/227680/consultation-review-of-telephony-USO.pdf. P.17

³ NSPCC figures: Total calls made (irrespective of length/whether reached the counsellor) to Childline between May 2019 up to and including April 2020 were 674,661.

Our response, which can be found in the annexe, outlines the NSPCC's concerns regarding the criteria for protecting PCBs. These are:

- The potential difficulty in responding to consultations. We suggest that consultations should include representatives with an interest in children's issues as a recognised and recommended consultee.
- Where there is clear or consistent use to a helpline, the PCB should be protected, regardless of the consultation result.
- Location in relation to other PCBs and institutions of relevance to children should be considered as a criterion.

Additionally, BT and KCOM should consider how to mitigate against the negative consequences of removing PCB given that both companies will financially benefit from not upgrading and removing loss making PCBs. For instance, with the costs that they will save, they could advertise that lifelines such as Childline are free to call and available online.

Additionally, Ofcom should look to review the UK's zero-ratings rules so that advice and support sites such as Childline can be accessed for free, even when children do not have data remaining.

This letter represents the views of the NSPCC, and I can confirm we are content for this to be published on the Ofcom website.

If you have any questions regarding any part of the response, please contact Richard Collard at Richard.collard@NSPCC.org.uk

Yours sincerely,

Rich Collard

Policy and Regulatory Manager

Annexe: Consultation response form

Please complete this form in full and return to telephonyUSO@ofcom.org.uk.

Consultation title	Review of the telephony universal service obligation
Full name	Richard Collard
Contact phone number	[X]
Representing (delete as appropriate)	Organisation
Organisation name	NSPCC
Email address	[X]

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?	

Your response

Question	Your response
Question 1: Do you agree with our proposed changes to the requirements on BT and KCOM in respect of the pricing and services provided by their PCBs? In particular do you agree with: (i) allowing free calls from PCBs;	Confidential? – N We support the proposed changes in principle. Phone calls to Childline are free and, therefore, this should not affect our services. However, it may be the case that some children wrongly believe calling Childline has a cost and

(ii) removing the requirement for PCBs to offer incoming calls where outgoing calls are free;

(iii) removing the requirement for PCBs to offer outgoing calls to unbundled tariff numbers (including premium rate and directory enquiries) and international numbers; and

(iv) removing the requirement for 70% of PCBs to accept cash payment and replacing it with a requirement on BT and KCOM to assess whether cash payment facilities meet an ongoing need.

Please provide reasons for your view.

making PCBs free will remove this perceived barrier to calling.

Question 2: Do you agree with our proposed new process for BT and KCOM to consult on proposed PCB removals? In particular do you agree with our proposed removal criteria for assessing whether there is an ongoing need for a PCB?

Confidential? – N

We have several reservations about the consultation process and criteria which need to be addressed.

Firstly, we are concerned that it may be difficult for groups which wish to respond to consultation to organise. These BT and KCOM consultations will happen on a local level and some communities will be more engaged than others. This should not impact children's ability to access vital lifelines. Consultations should be void if they do not achieve a minimum amount of engagement.

We agree that the four criteria are useful for ensuring people remain connected. It should be noted that prior accident and suicide hotspots are not indicative of future issues, and, vice versa, no prior use does not indicate there will not be a need in the future. That being said, where there is clear or consistent use to a helpline, the PCB should be protected, regardless of the consultation result.

Location in relation to other PCBs and institutions of relevance to children should be considered as a core criteria. Ofcom should set a geographically determined access requirement so that PCBs are as evenly

	<p>dispersed and as accessible as possible. BT and KCOM should also be forced to consider whether payphones are close to or likely to be used by children and young people in relevant institutions, such as schools or youth centres, where PCBs may have greater need.</p> <p>Finally, we recommend that the consultation criteria should force BT and KCOM to consider how they will mitigate against the negative effects of removing PCBs. Both providers will financially benefit by removing PCBs given that PCBs are often loss making and will require expensive retro fitting to migrate to internet protocol. To combat the financial incentive, BT and KCOM should have to consider its role in ensuring that people can stay connected. For instance, could they reserve some of the revenue to advertise that Childline offers free internet chat services.</p>
<p>Question 3: Do you agree with our proposal to impose a new resilience obligation for PCBs? And do you agree with our proposed guidance that those PCBs which are more likely to be needed in the event of a power cut should have a solution which enables emergency calls to continue to be made for a minimum of three hours in the event of a power outage?</p> <p>Please provide reasons for your view.</p>	<p>Confidential? – N</p> <p>PCBs which are more likely to be needed in a power cut should include resilience measures. We would expect that any PCB that meets the accident/suicide hotspot criteria or our proposed location criteria should be protected.</p>
<p>Question 4: Do you agree with the proposed amendments to the conditions on BT and KCOM in respect of considering requests for new PCBs?</p>	<p>Confidential? – N</p> <p>No view</p>
<p>Question 5: Do you agree that it is no longer appropriate for the universal service obligations to require provision of fax services in light of the impact of IP migration on the functionality of these services?</p>	<p>Confidential? – N</p> <p>No view</p>
<p>Question 6: Do you agree with our proposal to revoke the itemised billing requirement from the universal service conditions?</p>	<p>Confidential? – N</p> <p>No view</p>

Question 7: Do you agree with our proposed reporting requirements on BT and KCOM?

Confidential? – N

BT and KCOM should continue to report on the number of:

- PCBs they are continuing to provide
- Protected PCBs they have removed
- PCBs they are intending on removing in the following year, including details on location, and expected impact, including how many have been subject to the review process.
- Smart hubs installed

Question 8: Do you agree with our proposed changes to tidy-up the wording and definitions used in the universal service conditions?

Confidential? – N

No view