

Title:

Ms

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Representing:

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Organisation (if applicable):

Get Connected Helpline and the following organisations: Campaign Against Living Miserably (C.A.L.M), The Line to What Now, B-eat and Brook

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What do you want Ofcom to keep confidential?:

Keep nothing confidential

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Ofcom should only publish this response after the consultation has ended:

You may publish my response on receipt

Question 1: Do you agree that communications provider / single or multiple service provider partnerships are the most appropriate parties to apply for allocation of 116 numbers? :

Yes

Question 2: Do you agree that a comparative selection process is the most appropriate way of determining applications for 116 numbers? :

Yes

Question 3: Do you have any comments on the proposal for a ?call for interest? period? Do you think that six weeks allows sufficient time to make a submission of interest?:

No, six weeks is insufficient for a communications provider and potentially multiple service providers to develop partnership arrangements and submit expressions of interest.

The ?call for interest? period should ideally be three months, with wide publication by Ofcom to ensure that all potential service providers are aware of the opportunity. We are concerned that few service providers have heard about The Commission?s decision and recommend that more publicity than has been given thus far is needed.

Question 4: Do you have any comments on the proposal for Government coordinated advisory committees to assist Ofcom with the 116 number allocation process? Do you have any views on the possible membership of the advisory committees? :

We agree that an advisory committee of experts should be established. It should include professionals working in relevant social care sectors and not be limited to just civil servants and independent advisors.

However, caution needs to be given to potential conflicts of interest within this group; for example, experts in providing emotional support or responding to reports of missing children may be likely to represent services who will be submitting expressions of interest. Moreover, the Ministry of Justice estimates that a half of all helplines are either operated or funded (in whole or part) by local or central Government, which this raises questions of impartiality if a Government appointed committee is deciding the Service Eligibility Criteria and providing recommendations to Ofcom on their preferred service provider.

In addition, due to the likely expense incurred by providing the 116 helplines within the criteria specified by The Commission, Ofcom and the Government advisory committee, it may be that only those funded by Government are in a position to be able to afford to deliver this service. Funding could be a huge barrier to the provision of the 116 numbers.

Question 5:Do you have any comments on Ofcom?s assessment of the three charging options for 116 numbers? :

The assessment of the three options seems reasonable.

Question 6: Do you agree with Ofcom's conclusion that Charging option 3 - 116 numbers are either 'freephone' or 'free to caller' on an individual basis is the most appropriate option?:

As the charging decision relates to all 199 numbers that could potentially be allocated with a 116 prefix, flexibility should be given in the charging decision, as not all numbers will be fulfilling an 'urgent social need'. We therefore agree with Ofcom's conclusion that Charging option 3 is the most appropriate option.

However, it should be noted that this is likely to be confusing to the caller if there is a range of 116 numbers, whereby some are 'free to caller' and others are 'freephone'; the very vulnerable people that the 116 numbers exist to help may put off some people from calling if they do not know how much their call is likely to cost. Consideration should be given to how this can be made clear in the allocation and promotion of numbers.

Question 7: Do you agree with the suggested factors for deciding whether a service should be 'freephone' or 'free to caller'? Do you think any other factors should be taken into account?:

The age of the caller should be a determining factor; we would argue that numbers aimed at children and young people should be 'free to caller'.

In addition, consideration should be made to existing provision when deciding whether a service should be 'freephone' or 'free to caller', specifically the pricing structure of their calls. For example, the Specific Service Conditions as defined by The Commission for the Hotline for Missing Children state that the service should continuously available (24 hours a day, 7 days a week, nationwide). Moreover, Ofcom are recommending that this service should also be 'free to caller'. A continuously available and always 'free for caller' service will be a costly one to provide, and with no funding as yet offered by The Commission or Government, you risk no organisations being able to provide the service; this is certainly not in the interests of the public. One has to consider which is more preferable - no service available because the specifications were too high, or one that isn't quite as available or as free as one would hope, but that is nonetheless available and providing a high quality service.

Question 8: Do you agree that the initial three 116 services (116000 hotline for missing children, 116111 child helplines, 116123 emotional support helplines) should be 'free to caller'? If not, please give your reasons.:

We agree that these three numbers are of 'extreme social value' and as such should be 'free to caller'. However, as indicated in the answer to question 7, we believe that this will limit the number of organisations that are able to provide the service. In 6.29, you state that there are 'a variety of emotional support helplines in existence'. From our experience however, there aren't any 'general emotional support' helplines in existence (for over 18s) that are 'freephone' or 'free to caller'. Samaritans, the provider of the UK's largest emotional support helpline, is a local rate number.

Funding will be crucial to an organisation's ability to deliver these services and needs more consideration than has been given thus far. It should be noted that the helplines sector as a whole is not thriving ? helplines are closing or reducing their hours on a weekly basis due to a lack of funding. Furthermore, sponsorship (suggested as a primary source of funding within the consultation) is less likely to be forthcoming in the current economic climate, at a time when there is more of a demand for services of this nature.

Question 9: Do you have any comments on the Impact Assessment on the options for allocation of 116 numbers and charging arrangements? Do you agree with Ofcom's conclusions?:

The arguments for and against the various options have been well addressed in the Impact Assessment.

Question 10: Do you have any specific comments on the proposed modifications to the Numbering Plan, Numbering Condition and/or the access code application form as set out in Annexes 11 to 13?:

No

Comments:

This response is submitted on behalf of the following organisations: Get Connected, Campaign Against Living Miserably (C.A.L.M), B-eat and Brook.