

**NSPCC Response to the OFCOM consultation on the Harmonised  
European Numbers For Services of Social Value: Proposed allocation  
and charging arrangements for 116 numbers in the UK**

**NSPCC  
42 Curtain Road  
London  
EC2A 3NH**

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**Telephone: 020 7825 2543  
Fax: 020 7825 2964**

**Website: [www.nspcc.org.uk/publicaffairs](http://www.nspcc.org.uk/publicaffairs)**

**BASIC DETAILS**

Consultation title: **OFCOM consultation on the Harmonised European Numbers For Services Of Social Value : Proposed allocation and charging arrangements for 116 numbers in the UK**

To (Ofcom contact): Liz Greenberg

Name of respondent: Vijay Patel

Representing (self or organisation/s): NSPCC

Address (if not received by email):

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Name            Vijay Patel            Signed (if hard copy)

## Introduction

The National Society for the Prevention of Cruelty to Children (NSPCC) is the UK's leading charity specialising in child protection and the prevention of cruelty to children. The NSPCC's purpose is to end cruelty to children. We seek to achieve cultural, social and political change - influencing legislation, policy, practice, attitudes and behaviours for the benefit of children and young people. This is achieved through a combination of service provision, lobbying, campaigning and public education.

The NSPCC exists to end cruelty to children through a range of activities which aim to:

- help children who have suffered abuse overcome the effects of such harm;
- prevent children from suffering abuse;
- prevent children from suffering significant harm as a result of ill-treatment;
- help children who are at risk of such harm; and
- protect children from further harm.

We have more than 180 teams and projects throughout the United Kingdom. Their work includes:

- Providing telephone support for C&YP via ChildLine.
- Providing telephone support for adults concerned about the welfare of a child, assessing risk and making referrals to children's services
- Providing support for vulnerable children, young people and their families to help keep these C&YP safe and well cared for
- Providing services for children, young people who need help to overcome the impact of abuse.

## Response to the consultation questions

***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?***

We support the recommendation that a communications provider and service provider are the most appropriate parties to apply for allocation of a 116 number.

We understand the reason for the option of having multiple service provider partnerships. It does have attractions, especially in the context of devolution where Scotland and Northern Ireland and increasingly Wales are providing divergent services.

Our view however is that multiple service providers would prove to be immensely complex in terms of developing , implementing and ensuring that

the general public understand the differences and relationships between different service providers and are clear which service will meet their individual needs. Issues of service quality, consistency of approach and application of policies can all be problematic. Given the importance of ensuring a high quality service which is trusted (especially by children and young people) we believe this would be harder to achieve with multiple service providers. We also suspect that the costs of partnership may make it harder to make it cost effective. We are therefore in favour of Option 3.

This does not rule out other service providers being involved, but it would need to be clear to all that one service provider has the responsibility and others who work with it would need to adhere to one set of service standards.

***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. We do not think that six weeks provides enough time to allow communications providers and service providers to work on setting out an expression of interest. Clarity will be required in terms of what is expected between an expression of interest and a final proposal. As the consultation currently reads, our assumption is that the decision will be based on the expressions of interest. I

The telephone helplines, as OFCOM has recognised, are more than a technical operation. We consider that any advisory group would expect to see a reasonable amount of detail about how the service would operate, and the quality assurance measures that are in place. Our experience with our Helpline development programme does substantiate the need for a significant amount of time to be able to work with a communications provider on what sort of service could be provided and the costs that it would entail.

We would therefore recommend a minimum of 16 weeks.

Any allocation should be based on criteria based on the quality of the service that can be provided. A service for children and young people needs to be rooted in children's rights, an understanding of their experience and their needs and an understanding of the legal and procedural context of the country. These all need to be evaluated as part of any proposal.

***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 with the proposal for an advisory committee. We would strongly recommend that the voice of service users needs to be included. This can be done in a variety of ways, and we would be happy to assist in relation to engagement with children and young people. It is also important to ensure that there are representatives from across the UK, as consideration will need to be given to the differences across the UK and how these may affect uptake of the number by service users.

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

No, we do not have any specific comments. However, we suggest that the recent study by Child Helpline international on the implementation of 116 111 numbers is helpful for considering these issues, as this draws together the experience to date with regard to this.

***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?***

Yes. This is most appropriate option. Vulnerable children and young people need to be able to use the number without worrying about cost. Our experience with Childline again highlights the importance of being able to access the line easily and without having to worry about the cost of phoning.

***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?***

We support the analysis, but would advocate that there should be additional evaluation that includes a user perspective. These factors should then be reviewed in the light of learning that emerges.

***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.***

Yes.

**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?**

We agree for the most part with the conclusions, but as noted in Q1, we do not think option 4 about allocation is viable.

**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?**

This is not something we are competent to comment on.

For further information please contact Vijay Patel,  
Policy Advisor - Child Protection, on tel: 0207 825 2543; email:  
vijay.patel@nspcc.org.uk.