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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? :

The communications provider is just one part of a helpline's 'value chain'. Whilst it may provide flexible and effective routing, monitoring and other facilities, these are hygiene factors in today's world. THA believes that the real difference to the quality of the service delivered to the citizen lies in the effectiveness of its people and the systems it has for resolving or respond to the needs of the caller.

We therefore think allocation to a partnership is better than allocation to a communications provider (CP). We would go one step further and suggest that the service provider (SP) should be the lead partner, or that allocation is to the SP, with the CP being recommended by the SP and approved by an Ofcom advisory committee.

We also suggest that the allocation should be for a fixed period with a review point rather than indefinitely.

We think there should be contingencies for changes in arrangements. What happens in the event of a dispute between the SP and the CP, particularly where the CP's performance is affecting service delivery? As a consumer, the SP should be able to port the 116 number to another CP.

We assume that the CP is likely to be a network rather than a reseller, If the SP has a contractual relationship with a reseller that is served by more than one network, then the reseller may wish at some point to improve the service for the SP by using a different network. This is another reason for portability.

We also suggest that the allocation should be for a fixed period with a review point rather than indefinitely

Finally, there needs to be a clear definition of 'service provider'. Many helplines delivering services of social value may be existing services which are outsourced by the public sector. In these cases, it would provide more continuity to regard the commissioning body as the SP in the event that the service is re-tendered and awarded to a different agency. The relationship between outsourced agencies and their commissioners should be taken into account as part of the selection process.

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

We agree that comparative selection is most appropriate and would add that there is a need for ongoing monitoring of the delivery of the service.

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?:

We do not have a particular view on this.

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 think it is appropriate to establish advisory committees.

The THA, a registered charity, is the UK's only member body for helplines, and lead provider of support to helplines and their commissioners. It is well placed to play a significant, independent role on these committees.

Committees should place a high emphasis on quality of the SP. We believe that only helplines who have demonstrated their commitment to quality by accreditation with the THA Quality Standard should be eligible to provide 116 services.

The THA also believes that the advisory committee should play a role in the ongoing monitoring of the allocated CPs and SPs and suggests the allocation is for a fixed period.

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

See our response to question 6.

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?:

The THA has always supported helplines to develop free-to-caller services. This is not only because of removing the cost barrier to access - it is also because confidentiality is important to many users of helpline services, and zero-rated calls are not itemised on bills. In partnership with Ofcom and three CPs, it established a scheme which has allowed helplines to operate 080- numbers which are not only at affordable tariffs to the SP but also free-to-call from all of the UK mobile networks. Over 150 helplines are now using this scheme. With these services, which include the NSPCC Helpline for child protection and the Missing People helpline for runaways, the mobile networks have agreed to forego the additional income that they would otherwise receive if the calls were made at their standard rates. We recommend that Ofcom explores an equivalent model for the 116 range.

We are also aware of the need for clarity with consumers. If the first three 116 allocations are free-to-call services, then it is likely that the 116 prefix will become associated with 'free-to-call'. In the event that subsequent services were 'freephone', this is likely to cause confusion.

We therefore believe that all 116 services should be free-to-call and do not agree with the 'either freephone or free-to-caller' basis.

We also recommend that mobile networks are obliged to provide access to free-to-call 116 services from pay-as-you-go mobiles where there is no credit.

Finally, we suggest that Ofcom consider alternative terminology. Given the almost equal use of landlines and mobiles, the term 'freephone' is now as misleading in relation to 080- numbers as 'local rate' was in relation to 0845 numbers, The term freephone will be particularly confusing to UK visitors who are resident in countries where toll-free arrangements apply from all phones. 'Free from fixed/land lines' would be more appropriate, with 'free from all phones' as its counterpart.

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 believe that all 116 services should be 'free-to-caller'. In our experience, the same service can receive calls from people in situations that vary in their criticality both on a day-to-day basis and over time. The number and criticality of calls may also vary in the light of new or substitute services becoming available on the same or different channels. This makes judgments and predictions about relative social value difficult.

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 believe that all of these services should be 'free-to-caller'.

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?:

Whilst we strongly encourage the development of free-to-call services, we accept that cost is only one factor in the success of services, so do not necessarily agree that a free-to-caller 116 service would 'crowd out' similar services. Other factors include perceived quality and trustworthiness, the experience of people who use the service and, crucially, the effectiveness of service promotion (the success of certain 118-providers has arguably been driven by that of their promotional tactics). Whilst the SP and their agents will have a part to play in promoting each individual 116 number, THA suggests that Ofcom has a role in promoting the new range as a whole.

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?:

We do have any comments on this.

Comments: