

Communications Consumer Panel and ACOD response to Ofcom's consultation on revising the guidance for the provision of Calling Line Identification information

The Communications Consumer Panel (the Panel) and the Advisory Committee for Older and Disabled People (ACOD) welcome the opportunity to respond to this consultation on revising the guidance for the provision of Calling Line Identification information (CLI).

The Panel works to protect and promote people's interests in the communications sector, including the postal sector. We are an independent statutory body set up under the Communications Act 2003. The Panel carries out research, provides advice and encourages Ofcom, governments, the EU, industry and others to look at issues through the eyes of consumers, citizens and microbusinesses.

The Panel pays particular attention to the needs of older people and people with disabilities, the needs of people in rural areas and people on low incomes, and the needs of micro businesses, which have many of the same problems as individual consumers.

Four members of the Panel also represent the interests of consumers in England, Northern Ireland, Scotland and Wales respectively. They liaise with the key stakeholders in the Nations to understand the perspectives of consumers in all parts of the UK and input these perspectives to the Panel's consideration of issues. Following the alignment of ACOD with the Panel, the Panel is more alert than ever to the interests of older and disabled consumers and citizens.

Response

The Panel has placed a focus on the importance of tackling nuisance calls for a number of years, understanding the fear, uncertainty and harm that these calls can cause consumers, who have been unable to prevent them and have in some cases resorted to coping mechanisms such as not answering the phone. We have welcomed the work by Ofcom and the Information Commissioner's Officer (ICO) in their Joint Action Plan and by communications providers in developing technology that is able to block nuisance calls at network level.

We have urged communications providers (CPs) to provide free CLI throughout that time. Some providers already do this and we have called for it to be mandatory. We were therefore in strong support of Ofcom's provision, in its revised General Conditions, of a new requirement on CPs to provide CLI free of charge, from October 2018.

In response to this consultation on changes to Ofcom's guidance:

- We support the clarification of Ofcom's guidance to ensure that CLI is correct in the first place - and that the correct information is passed safely between providers, to ensure that the consumer receives only valid and accurate information.



- We welcome the amendments and the positive impact they will have on consumers - particularly voice-only consumers, who rely on their landline as their main communications service. We also support the proposals as a way of assisting regulators and enforcement bodies in tackling nuisance calls. We have strongly supported the tougher enforcement action that has been taken, from financial penalties to naming and shaming the companies responsible. These sanctions rely heavily on all involved in operating communications networks working together to prevent causing fear and harm to often vulnerable consumers in their own homes.
- In emergency situations, CLI is even more critical - as highlighted in the consultation document, without the correct CLI data it is more difficult for the emergency services to identify the location of a caller in danger, leading to potentially life-threatening delays.
- As well as urging CPs to comply with the Secure Telephone Identity Revisited (STIR) standard¹, once it is implemented in the UK, we would support Ofcom's proposals urging CPs to protect their customers in the interim by only passing on authentic CLIs. We recognize that there are technical challenges in tackling spoofing, but it is essential that CPs keep up with the spoofers to maintain the integrity of their network - and in the case of the CPs that are still charging their customers to receive CLI, to be unable to authenticate the data would seem to be a double injustice.
- Consumers who use confidential helpline numbers (such as people living with domestic abuse), need to feel safe in the knowledge that their abuser will not find out that they have spoken to people outside the home about their circumstances. It is therefore vital that such organisations are able to withhold their number. We note that Ofcom's CLI guidance already contains provisions to protect the rights of consumers under data protection law, and specifically the PECR, which cover these circumstances. We are pleased to see that those provisions remain unchanged in this review.

¹ <https://datatracker.ietf.org/wg/stir/charter/>