

# Ofcom's guidance on multi-factor authentication relating to Auto-Switch (17 June 2022)

- 1.1 This document contains Ofcom's guidance on General Condition C7.28<sup>1</sup> relating to Auto-Switch, as noted in Section 4 of the February 2022 Statement.<sup>2</sup>
- 1.2 The purpose of this guidance is to explain how providers can comply with the requirement to provide a PAC, N-PAC<sup>3</sup> and/or Switching Information to residential switching customers within one minute, where providers are using multi-factor authentication.

## Guidance on Condition C7.28: How and when the PAC, N-PAC and/or Switching Information must be provided to residential tariff customers

- 1.3 This guidance does not form part of the General Conditions and is not binding on Ofcom. While we will take it into account, we will determine compliance with Condition C7.28 on the basis of the individual circumstances of any given case. However, where we decide to depart from the guidance, we expect to give reasons for doing so.
- 1.4 Words and expressions used in Condition C7.28 have the same meaning when used in this guidance.

## Authenticating residential switching customers requesting a PAC, N-PAC and/or Switching Information

- 1.5 GC C7.28 states that "Regulated Providers must ensure that when they provide the PAC or N-PAC and/or (as applicable) the Switching Information in accordance with Condition C7.26 (a) and (b) to a Mobile Switching Customer, they do so no later than one minute from receipt of the request."
- 1.6 Providers must allow customers to request a PAC or N-PAC and/or Switching Information via at least three different methods – SMS, phone and their online account.<sup>4</sup> Before providing the PAC or N-PAC and/or Switching Information, providers will need to

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<sup>1</sup> Ofcom, [General Conditions of Entitlement Unofficial Consolidated Version with effect from 17 December 2021](#). The GC numbering in Condition C7 will change following our February 2022 Statement. GC C7.28 will become C7.36 and the GC numbering in this guidance will be updated accordingly on 3 April 2023.

<sup>2</sup> See Ofcom, [Statement: Quick, easy and reliable switching](#), February 2022.

<sup>3</sup> This term will be replaced by the term 'STAC' (Service Termination Authorisation Code) on 3 April 2023 to better reflect the terminology used by providers.

<sup>4</sup> Condition C7.23, Ofcom, [General Conditions of Entitlement Unofficial Consolidated Version with effect from 17 December 2021](#). See footnote 1 for further information on forthcoming changes to GC numbering.

authenticate their customers. It is for providers to determine how best to satisfy the requirements of data protection regulations in authenticating their customers.

- 1.7 It therefore remains open to them to design their processes to include additional authentication of customers requesting a PAC or N-PAC and/or Switching Information, for example using multi-factor authentication. Multi-factor authentication involves the customer needing to provide more than one credential to prove their identity to the provider.
- 1.8 Because multi-factor authentication usually relies on the customer inputting information, the time it takes to complete is in part dependent on the time the customer takes to supply the information.
- 1.9 Below, we set out guidance on the information providers should request from customers, and the circumstances in which they are permitted to 'stop the clock', when using multi-factor authentication.

#### **Information providers should use to authenticate customers' identities**

- 1.10 As noted in our October 2018 letter to industry,<sup>5</sup> when using multi-factor authentication to authenticate a customer's identity, providers should ask customers to provide information that they are likely to be familiar with, is easily memorable, or is readily accessible to the customer. For example, this could be their date of birth or postcode.
- 1.11 We do not consider that a customer's account number, password, or their last amount billed meets these requirements, and providers should not request this information, or anything else which a customer is likely to be unfamiliar with or struggle to remember, when seeking to authenticate a customer's identity. Doing so may necessitate the customer engaging further with their provider to locate it, leading to hassle and potentially delaying the switching process.

#### **Stopping the clock when requesting information from the customer**

- 1.12 Where providers use multi-factor authentication to authenticate a customer's identity when they have requested the PAC or N-PAC and/or Switching Information, it is acceptable for them to 'stop the clock' between the customer receiving the request for the additional credential, and the customer providing it.
- 1.13 This means that where a provider is using multi-factor authentication to verify a customer's identity when they have requested the PAC or N-PAC and/or Switching Information, the required information should be delivered within one minute of the provider receiving the request, excluding the time that the customer takes to provide the additional credential.
- 1.14 For the avoidance of doubt, it is not acceptable for the PAC or N-PAC and/or Switching Information to be provided to the customer more than one minute after the customer had

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<sup>5</sup> See Ofcom, [Letter to industry on SMS authentication](#), October 2018.

made the request simply because the provider is using a multi-factor authentication process.