

Tackling scam calls

Updating our CLI Guidance to expect providers to block more calls with spoofed numbers

Consultation

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1. Overview

- 1.1 Scam calls can result in significant financial and emotional harm to victims. They can also lead to a reduction in trust in telephone calls. Scam callers may ‘spoof’ their telephone number to disguise the origination of the call, or to make their call appear to be from a trusted person or organisation. Where a scammer makes a call from abroad, they may spoof their number to make it look like the call is from a UK-based organisation, when in fact they are calling from abroad.

What we are proposing – in brief

In this consultation, we are proposing to update our Calling Line Identification (CLI) Guidance to confirm that providers are expected to identify and block calls from abroad that use a UK geographic or non-geographic telephone number as a Presentation Number, except in a limited number of legitimate use cases.¹

This update should remove a loophole through which scammers can spoof a UK number from abroad (making it look like the call is coming from a UK-based organisation) and connect these calls to UK users.

- 1.2 A telephone number is also known as Calling Line Identification (CLI) data. Ofcom sets out the requirements for the display of CLI Data in the General Conditions of Entitlement (GCs), under GC C6. This is accompanied by the CLI Guidance, which sets out what is expected of providers to comply with GC C6.
- 1.3 There are two numbers associated with an incoming call: the Network Number, which identifies where the call is being made from; and the Presentation Number, which identifies who is making the call. In most cases the Network and Presentation Number are the same, but there are some scenarios where a caller may wish to display a different number to the line the call is being made from (for example, a call centre that makes calls on behalf of different businesses, or businesses which may wish to display a single number for outbound calls). In November 2022, we published a statement which included a decision to update the CLI Guidance to confirm that communications providers are expected to identify and block calls from abroad which are spoofing a UK CLI as Network Number, except in a limited number of use cases.
- 1.4 In April 2023, we published a consultation inviting views on the potential introduction of CLI authentication (the 2023 CLI Authentication Consultation), and in response to this consultation, a number of stakeholders showed support for expanding the CLI Guidance to incorporate blocking of international calls with a UK number as a Presentation Number.² Stakeholders explained that calls with UK numbers entering the UK from abroad remained a problem. They noted that other measures, including extending the measures in the CLI Guidance to include Presentation Numbers, could be equally or more effective compared to CLI authentication.

¹ Ofcom, 2023. [Guidance on the provision of Calling Line Identification facilities and other related services.](#)

² Ofcom, 2023. [Consultation: Calling Line Identification \(CLI\) authentication – a potential approach to detecting and blocking spoofed numbers.](#)

- 1.5 We are now proposing to update our CLI Guidance to confirm that providers are expected to identify and block calls from abroad which are spoofing UK Presentation Numbers, with some limited exceptions which we set out in Section 3 below. If our proposals are implemented, we would expect providers to adopt the updated guidance in order to demonstrate their compliance with GC C6.6.
- 1.6 The proposals in this consultation are part of a suite of measures which are set out in our CLI authentication assessment and future roadmap publication.³
- 1.7 We invite stakeholder comments on the proposals set out in this document. The deadline for responding is 28 March 2024.

The overview section in this document is a simplified high-level summary only. The proposals we are consulting on and our reasoning are set out in the full document.

³ Ofcom, 2024. [Calling Line Identification \(CLI\) authentication assessment and future roadmap](#).

2. Background

- 2.1 One of our key priorities is furthering the interests of telecoms consumers. This includes protecting consumers from scams. As noted in Section 2 of our CLI authentication assessment and future roadmap publication (CLI Authentication Update), fraud accounts for over 40% of all reported crime in England and Wales.⁴ This results in significant financial and emotional harm to victims.
- 2.2 Scammers use CLI spoofing to create a trusted persona to mislead the recipient of the call about their identity, so that their calls are more likely to be answered. Consumers are more likely to answer calls from an unknown UK number than from an unknown international number or a withheld number.⁵ Misuse or spoofing of CLI can also lead to a reduction in trust in telephone calls, which may mean that even legitimate calls may be declined. Businesses may then face greater challenges in contacting consumers for legitimate purposes.

Use of spoofing in scam calls

- 2.3 A common tactic used by scammers is to ‘spoof’ telephone numbers, to make their calls appear to be from a trusted person or organisation. A spoofed number on a call display could be a random series of digits, or it could mimic the number of a real company or person who has nothing to do with the actual caller. Fraudsters based abroad often spoof UK CLIs to make scam calls to UK consumers, which might encourage the recipient to believe that a call is from a legitimate source and make them more likely to answer it. The use of spoofed numbers has also made it harder to detect and block such calls and to trace perpetrators.
- 2.4 The misuse of CLI data, and spoofed Presentation Numbers in particular, can lead to significant harm for consumers. As we noted in the 2023 CLI Authentication Consultation, CLI spoofing can be used by scammers to mislead the recipient of a call about their identity in order to encourage them to give away sensitive information or money. As such, successful scams, especially multichannel scams (scams in which contact is made with the consumer via more than one form of communications), can result in significant financial losses.
- 2.5 In addition to financial harm, telecoms scams can cause significant emotional and psychological harm. They may also contribute to growing lack of trust in telephone numbers, which would be detrimental to UK consumers and businesses. Any loss of trust in communications services may result in legitimate communications being ignored, blocked or not received.

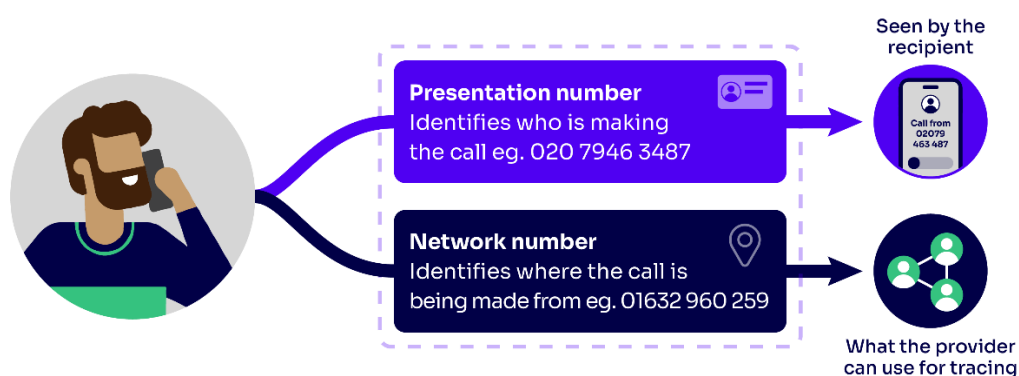
⁴ Ofcom, 2024. [Calling Line Identification \(CLI\) authentication assessment and future roadmap](#), paragraph 2.11.

⁵ [Ofcom CLI and Scams Consumer Research 2022](#), slide 8.

Rules for the use of CLI data

- 2.6 Ofcom sets out the requirements for the display of CLI Data in the General Conditions of Entitlement (GCs), under GC C6.⁶ This is accompanied by the CLI Guidance, which sets out what is expected of providers to comply with GC C6.⁷
- 2.7 The telephone number, also known as Calling Line Identification (CLI) data, includes both information that identifies the caller, and a privacy marking, which indicates whether the number can be shared with the recipient of the call. CLI data can give the recipient of a call information about the identity of the party making the call, which can help them to decide whether they wish to answer or return it. There are two numbers associated with CLI data: the Presentation Number and the Network Number. Call recipients see the Presentation Number when they answer a call. The Network Number is shared with providers to identify the origin of the call.
- 2.8 In most cases, the two numbers are the same; however, there are scenarios where a caller may wish to display a different number from the line that they are calling from, for example where a call centre may make calls on behalf of a number of different businesses, or businesses which may wish to display a single number for outbound calls.

Figure 1: Presentation Number and Network Number



History of GC C6 and the CLI Guidance

- 2.9 As part of our 2017 review of the GCs, we introduced GC C6, which applies to all providers of Number-based Interpersonal Communications Services and Public Electronic Communications Networks over which Number-based Interpersonal Communications Services are provided.⁸ We also published a new version of the CLI Guidance to support GC C6.⁹
- 2.10 GC C6 includes requirements for providers to:
- provide CLI facilities by default unless they can demonstrate that it is not technically feasible or economically viable to do so;

⁶ Ofcom, General Condition C6, [General Conditions of Entitlement](#).

⁷ Ofcom 2023. [Guidance on the provision of Calling Line Identification \(CLI\) facilities and other related services](#).

⁸ In our statement on [Implementation of the new European Electronic Communications Code](#) we explained our decision to replace the term 'Publicly Available Telephone Service' with the new term 'Number-Based Interpersonal Communications Service' in GC C6 (see Section 3 of the statement). The term captures, for example, fixed and mobile telephone services, as well as VOIP outbound call services.

⁹ Ofcom, 2023. [Statement: Guidelines for Calling Line Identification Facilities](#).

- ensure, so far as technically feasible, that any CLI data provided with, or associated with a call, includes a valid, dialable telephone number which uniquely identifies the caller; and
 - take all reasonable steps to identify and block calls in relation to which invalid or non-dialable CLI data is provided.¹⁰
- 2.11 In February 2022, we consulted on proposals to modify GC C6.6 and make changes to the CLI Guidance (the February 2022 Consultation) and in November 2022, we published our decision to modify GC C6 to require providers, where technically feasible, to identify and block calls with CLI data that is invalid, does not uniquely identify the caller, or does not contain a number that is dialable (the November 2022 Statement).¹¹ We also set out our decision to make a number of changes to our guidance for providers on what we expect them to do to comply with the rules in GC C6, including confirmation of the proposed change to identify and block calls from abroad spoofing a UK CLI as a Network Number.¹²
- 2.12 The changes to GC C6.6 and the CLI Guidance both came into force on 15 May 2023 (six months after the publication of the November 2022 Statement).
- 2.13 Under GC C6, spoofing is not permitted in relation to calls originating within the UK as the call originator is expected to check that the caller has the permission to make outbound calls with the CLI. The changes we made in the November 2022 Statement also meant that calls from abroad could only use a UK CLI as a Network Number in a limited number of legitimate use cases.
- 2.14 In response to the February 2022 Consultation, some stakeholders expressed concern that there was a potential loophole by which overseas callers could make calls to UK recipients using a UK CLI as a Presentation Number and using a different number (an international number or mobile number) as a Network Number. In our November 2022 Statement, we noted our understanding that, based on information provided by BT Group, nearly all calls with UK CLIs entering BT Group’s international gateways have the same number as the Network Number and Presentation Number. Therefore, at the time, we considered that blocking calls with UK CLI as a Network Number would lead to fewer scam calls being connected. However, we agreed that this measure could be circumvented by scammers and said that we would consider consulting on blocking calls from abroad which use UK CLI as a Presentation Number.¹³

Developments since our November 2022 Statement

- 2.15 Scammers continually adapt their tactics, and as we explain in our CLI Authentication Update, calls spoofing a UK CLI from abroad remain a problem.¹⁴ There are two main aspects to this issue:
- blocking calls from abroad using a UK geographic or non-geographic CLI as a Presentation Number; and

¹⁰ Ofcom, General Condition C6, [General Conditions of Entitlement](#).

¹¹ Ofcom 2022. [Statement: Improving the accuracy of Calling Line Identification data](#).

¹² A full list of the changes to the CLI Guidance from the November 2022 Statement can be found in Section 4 of the statement [Improving the accuracy of Calling Line Identification \(CLI\) data](#).

¹³ Ofcom 2022. [Statement: Improving the accuracy of Calling Line Identification data](#), paragraph 4.156.

¹⁴ Ofcom, 2024. [Calling Line Identification \(CLI\) authentication assessment and future roadmap](#), pp. 12 - 13.

- blocking calls from abroad spoofing a UK mobile number.
- 2.16 To block calls from abroad that spoof a UK mobile number, there is a need to be able to distinguish between calls that are from UK callers roaming abroad phoning back into their home country and calls that are spoofing UK mobile numbers. We have therefore begun to explore the available options for identifying genuine mobile roamers, including measures introduced by other jurisdictions, and will assess the anticipated benefits and challenges. If we are able to identify a potential solution to validate legitimate roaming calls, we will consider consulting on these options in due course.

Ofcom's work in improving the accuracy of CLI data

- 2.17 In the CLI Authentication Update we noted that, while CLI authentication offers several advantages relative to other interventions to prevent spoofing (greater automation, a speedier process for identifying bad actors), it is not a 'catch all' solution and cannot address the risk of harm from spoofed calls completely.¹⁵ This is because CLI authentication on its own is unlikely to sufficiently hinder scam calls that originate overseas. Moreover, CLI authentication would be complex, costly and time-consuming to implement, whereas we believe that alternative measures may have the potential to reduce number spoofing effectively and more quickly.
- 2.18 In addition, following the changes to the CLI Guidance made in our November 2022 Statement explained above, we have seen scammers who are operating abroad shift to using more sophisticated techniques to make it appear as if their calls are originating in the UK, using UK gateway operators which may not be fully complying with our rules and which are also hard to identify.
- 2.19 In response to our 2023 CLI Authentication Consultation, five providers (TalkTalk, Three, BT Group and two confidential responses) and NICC's N-CLI Task Group¹⁶ showed support for expanding the CLI Guidance to incorporate blocking of international calls with a UK CLI as a Presentation Number.¹⁷ Stakeholders explained that extending the measures in the CLI Guidance to include Presentation Numbers could be equally or more effective compared to CLI authentication.¹⁸

International developments

- 2.20 Many other countries have introduced similar measures to identify or block international calls that use numbers from their national number ranges. Many of these rules do not distinguish between Network Numbers and Presentation Numbers. These include rules for:

¹⁵ Ofcom, 2024. [Calling Line Identification \(CLI\) authentication assessment and future roadmap](#), p.24.

¹⁶ The NICC is the UK telecommunications network and service interoperability standards body. The N-CLI Task Group is the Nuisance Call and CLI Task Group and has developed the relevant technical standards and guidance on implementing the requirements of GC C6 and the CLI guidance.

¹⁷ Ofcom, 2023. [Consultation: Calling Line Identification \(CLI\) authentication - a potential approach to detecting and blocking spoofed numbers](#).

¹⁸ Ofcom, 2024. [Calling Line Identification \(CLI\) authentication assessment and future roadmap](#), p.17.

- blocking international calls with numbers from their national number ranges (excluding calls to users roaming in that country) by Finland¹⁹, Lithuania²⁰ and Türkiye²¹; and
- identifying calls using numbers from their national number ranges and requiring the withholding of these numbers to the recipient of the call (international roaming calls are exempt) by Germany²² and Switzerland²³.

2.21 Ireland²⁴, Malta²⁵ and Austria²⁶ are also all consulting on international call blocking measures.

This consultation

2.22 In light of these considerations, we propose to update our CLI Guidance to confirm that providers are expected to identify and block calls from abroad which spoof UK Presentation Numbers. These proposals are part of a suite of measures set out in our CLI Authentication Update, published alongside this consultation, which sets out next steps for our work to detect and block voice scams, including those using spoofed numbers. The proposed update to our guidance, and the initiatives announced in the CLI Authentication Update, form part of our wider programme of work to reduce the harm experienced by consumers in this area by tackling scams which arrive via telecommunications channels within the UK.

Structure of this document

2.23 We set out the specific changes we are proposing to make to the CLI Guidance in section 3 below. We assess the impact of our proposals in section 3 and Annex A2.

¹⁹ See [Traficom's Regulation 28 on the interoperability of communications networks and services](#). From 2 October 2023 operators must in addition block calls when the number is a Finnish mobile number which is not roaming.

²⁰ See [TN-347 Lithuania's Communications Regulatory Authority's decision on rules on the use of communications numbers](#).

²¹ See BTK's [Procedures and principles regarding the use of Caller Line Information \(CLI\)](#).

²² [Telecommunications Modernization Act 2021](#).

²³ See [Telecommunications Services Ordinance](#) Switzerland asks their providers to co-ordinate with each other to delete the number or to block the call.

²⁴ See [Comreg's consultation on combatting Nuisance Communications](#).

²⁵ See [MCA's Consultation and Proposed Decisions: Preventative measures to mitigate CLI spoofing and vishing scams](#).

²⁶ See [RTR's consultation on measures against the inadmissible display of telephone numbers-spoofing](#).

3. Proposed update to CLI Guidance

Introduction

- 3.1 The CLI Guidance sets out what is expected of providers to comply with the requirements in GC C6. We are proposing to update the CLI Guidance to confirm what we expect providers to do to identify calls from abroad that do not have valid, dialable CLI data which uniquely identifies the caller. If our proposals are implemented, we would expect providers to adopt the updated CLI Guidance to demonstrate their compliance with GC C6.6.

Our current guidance

- 3.2 Our guidance for receiving calls from outside of the UK is set out in paragraphs 4.15-4.19 of the CLI Guidance. The provider that first receives the calls into the UK network has the responsibility to check the validity of the CLI data. The guidance already sets the expectation that this provider should check whether the call has a valid Presentation and Network number and if they comply with the international public telecommunications numbering plan ITU-T E.164.
- 3.3 The expectations for international calls that have a UK CLI are set out in paragraph 4.19:

As the CLI represents the origin of a call, calls from abroad should not use UK CLI as a Network Number, except in a limited number of use cases:

- UK mobile users roaming overseas making calls back to UK numbers, i.e. calls with a CLI from the +447 range;
- Calls to a mobile user who is roaming in the UK
- Where the traffic has originated on a UK network;
- Where the traffic has originated from UK customers that are hosted on overseas nodes or cloud services.

Except in these use cases, calls from abroad using UK CLI should be blocked.

Our proposal

- 3.4 Taking into account all relevant background and context set out in Section 2 above, we are proposing to update our CLI Guidance to confirm that providers are expected to identify and block calls from abroad which are spoofing UK Presentation Numbers. In particular, this proposal considers:
- a) responses from providers to our 2023 CLI Authentication Consultation which supported +44 Presentation Number blocking at international gateways as a possible alternative measure to CLI authentication;²⁷

²⁷ Ofcom, 2024. [Calling Line Identification \(CLI\) authentication assessment and future roadmap](#).

- b) stakeholder responses to our February 2022 Consultation on improving the accuracy of CLI data that Presentation Number could still be spoofed and therefore needed to be blocked;²⁸
- c) current examples of providers already blocking UK Presentation Numbers from abroad;
- d) direct or indirect evidence of potential harm from spoofing UK Presentation Numbers; and
- e) international context and developments in this area.

3.5 Specifically, we are proposing to update the text in paragraph 4.19 of our CLI Guidance so that this applies to the Network Number and Presentation Number of calls that enter the UK network from abroad. This would mean that calls which have a UK CLI as a Presentation Number and a Network Number from another country could also be within the scope of this recommendation. The proposed update is shown below:

Current version of paragraph 4.19	Proposed version of paragraph 4.19
<p>4.19 As the CLI represents the origin of a call, calls from abroad should not use UK CLI as a Network Number, except in a limited number of use cases:</p> <ul style="list-style-type: none"> • UK mobile users roaming overseas making calls back to UK numbers, i.e. calls with a CLI from the +447 range; • Calls to a mobile user who is roaming in the UK; • Where the traffic has originated on a UK network; • Where the traffic has originated from UK customers that are hosted on overseas nodes or cloud services. <p>Except in these use cases, calls from abroad using UK CLI should be blocked.</p>	<p>4.19 As the CLI represents the origin of a call, calls from abroad should not use UK CLI as a Network Number or as a Presentation Number, except in a limited number of use cases:</p> <ul style="list-style-type: none"> • UK mobile users roaming overseas making calls back to UK numbers, i.e. calls with a CLI from the +447 range; • Calls to a mobile user who is roaming in the UK; • Where the traffic has originated on a UK network; • Where the traffic has originated from UK customers that are hosted on overseas nodes or cloud services. <p>Except in these use cases, calls from abroad using UK CLI should be blocked.</p>

3.6 Providers will be expected to adopt the updated guidance in order to demonstrate their compliance with GC C6.6.

3.7 We consider that it is important the CLI Guidance is updated so that the implementation of this blocking is co-ordinated between all relevant providers and a deadline is set by which this blocking should be in place. Otherwise, scammers may continue to exploit loopholes and connect their calls through routes that do not block the use of a UK CLI as a Presentation Number for calls from abroad. Therefore, this measure is only fully effective if all networks who accept calls from abroad into the UK networks identify and block these calls.

²⁸ Ofcom, 2022. [Statement: improving the accuracy of Calling Line Identification \(CLI\) data.](#)

- 3.8 There is an exception for calls from abroad with +447 numbers, so that calls from UK mobile users roaming abroad are not blocked. Therefore, this will apply to calls from outside the UK using a UK geographic or non-geographic number.

Impact assessment

- 3.9 Section 7 of the Communications Act 2003 requires us to carry out and publish an assessment of the likely impact of implementing a proposal which would be likely to have a significant impact on businesses or the general public, or when there is a major change in Ofcom's activities.
- 3.10 More generally, impact assessments form part of good policy making and we therefore expect to carry them out in relation to a large majority of our proposals. We use impact assessments to help us understand and assess the potential impact of our policy decisions before we make them. They also help us explain the policy decisions we have decided to take and why we consider those decisions best fulfil our applicable duties and objectives in the least intrusive way. Our impact assessment guidance sets out our general approach to how we assess and present the impact of our proposed decisions.
- 3.11 We believe our proposal will provide an overall benefit to consumers, telecoms providers, and legitimate businesses. We consider the impact of our proposal on different groups of stakeholders below. Our equality impact assessment and Welsh language impact assessment are set out in Annex A2.

Impact on consumers

- 3.12 Our proposals would make it more difficult for fraudsters based abroad to spoof UK CLIs to make scam calls to UK consumers. Such calls may encourage the recipient to believe that a call is from a legitimate source (e.g. their bank) and make them more likely to answer it. Confirming that we expect providers to block calls from abroad with a UK CLI as Presentation Number will make it more difficult for callers from outside the UK to spoof a UK geographic or non-geographic number.
- 3.13 Our proposal is one of a number of measures – by Ofcom, other regulators, government and industry – designed to disrupt scams in general and reduce harm, as no single measure alone is likely to stop scams. However, we expect our proposal to benefit consumers as it removes a loophole through which scammers can spoof a UK geographic or non-geographic number when making calls from abroad.
- 3.14 We expect this to reduce the number of scam calls that consumers receive via such spoofed numbers. This expectation is supported by the evidence submitted in response to our 2023 CLI Authentication Consultation. BT Group explained that it was blocking up to one million calls per day following the implementation of blocking of international calls with UK network and Presentation Numbers.²⁹
- 3.15 Further benefits to consumers will come from easier identification and blocking of nuisance and scam calls that continue to be made from abroad. This is because tracing calls with spoofed numbers is difficult for the providers and our proposal will reduce the number of

²⁹ [BT Group response](#) to the 2023 CLI authentication consultation, paragraphs 4.7 - 4.9.

these types of calls. Tracing problematic calls that continue to be made from abroad will therefore become easier, as these will be more often forced to use genuine numbers.

- 3.16 Scam calls result in significant financial harm for victims, as well as wider harm to individuals and businesses. Estimates of financial losses typically do not isolate the exact amounts associated with scams that use spoofed phone calls. However, we believe that the total losses from scams using spoofed phone calls could plausibly be more than £100m annually.³⁰ This is based on a range of evidence and takes into account that fraud is generally under-reported. As such, even a moderate reduction in spoofed calls as a result of our proposal could have a material benefit to consumers.
- 3.17 We expect that, over time, our proposal will also contribute to improving trust in calls that display a UK geographic or non-geographic number, and encourage consumers to answer a higher proportion of legitimate calls. We expect this to benefit consumers who would otherwise be harmed when important, urgent or valued calls go unanswered.
- 3.18 As there is an exception for CLIs that start +447, to ensure that calls from UK users roaming abroad are not blocked, some scammers may move to spoofing UK mobile numbers instead. We are doing further work to explore how to identify UK mobile users who are roaming abroad and, if we are able to identify a potential solution to validate legitimate roaming calls, we will consider consulting on these options in due course.

Impact on telecoms providers

- 3.19 While we expect that some providers will incur costs when implementing our proposal to block calls from abroad with a UK Presentation Number, we do not expect these costs to be unduly onerous. We also expect that costs will be at least partly offset by a benefit of fewer customer complaints, improved prospects for tracing suspicious calls, and any additional revenue from business customers abroad who may need to directly connect into the UK network. We elaborate on these impacts below.
- 3.20 We expect the update to the CLI Guidance to affect the following types of telecoms provider:
- a) providers that first receive scam calls from abroad into the UK network;
 - b) networks abroad, and therefore outside the scope of GC C6, that connect calls from abroad with a UK CLI as a Presentation Number into a UK network; and
 - c) cloud voice providers.
- 3.21 Providers that first receive calls into the UK network will need to work with their international interconnect partners to identify calls that have a UK Presentation Number and understand whether these are legitimate uses of UK CLI. This is likely to require a process change when setting up that interconnection, as it is not possible to do this at the time of the call. Routes that have legitimate UK traffic would need a way to be connected to UK customers so that these calls are not blocked. Other calls that are spoofing UK CLI as a Presentation Number will need to be blocked. The costs associated with these process changes may differ between providers, but we do not expect them to be unduly onerous. We also anticipate an additional source of revenue for these providers, as callers from

³⁰ Ofcom, 2023. [Calling Line Identification \(CLI\) authentication: a potential approach to detecting and blocking spoofed numbers](#), paragraph 3.49.

abroad who can legitimately use a UK CLI may need to pay for a direct connection to the provider to ensure that their calls are not blocked.³¹

- 3.22 Networks abroad, and therefore outside the scope of GC C6, may incur additional costs to connect their calls into the UK to ensure that legitimate calls that comply with our updated guidance on UK CLI are not blocked. However, bulk of these costs are likely to be passed on to businesses who make use of communication services from these types of providers. We set out the impact on these businesses in paragraph 3.25 below.
- 3.23 Cloud voice providers will need to ensure that the calls from UK callers with a UK CLI as Presentation Number are not blocked. We do not expect significant additional costs for cloud voice providers, who connect their calls from an IP network into the UK telephony network. As we explained in our November 2022 Statement, cloud providers already have the technical capability to connect calls directly to a UK network. As they are already doing this for calls with UK CLI as a Network Number, we do not anticipate any additional costs for calls with UK CLI as a Presentation Number.
- 3.24 More generally, a reduction in scam calls should lead to a reduction of consumer complaints to providers about unwanted calls. Similarly, fewer calls with spoofed numbers will make it easier for UK providers to trace problematic calls that continue to be made. We consider that these benefits to the industry will at least partially offset the costs of complying with our proposed update to the CLI Guidance.

Impact on businesses

- 3.25 We expect that the updated guidance will be beneficial to legitimate businesses, in particular medium and larger firms, and those in the financial services and utility sectors. Such firms are more likely to contact consumers using geographic or non-geographic numbers, rather than mobile numbers. Spoofing a firm's number can lead to direct costs for the business to deal with complaints and can also cause reputational harm for the organisation that has been impersonated. These harms and costs would be reduced by preventing scammers based abroad from spoofing these numbers, as it would provide greater protection for businesses from impersonation attempts. This will also improve trust in calls that display a UK geographic or non-geographic number and therefore help businesses as a greater proportion of their attempted calls may be answered.
- 3.26 However, UK businesses who use calling services from abroad, for example offshore call centres and those that have employees based abroad, may also be affected by this change. Where they can legitimately use a UK number, they may need to change the ways their calls are routed to ensure they are not blocked. There may be incremental costs associated with this as they may no longer be able to route the call via the cheapest international routes into the UK. We expect any incremental cost incurred by individual businesses to be relatively small, noting some call centres and businesses may have already made changes to the way they route calls into the UK following our changes on blocking international calls with UK CLI

³¹BT Group is already voluntarily blocking calls from abroad with UK CLI as a Presentation Number, which suggests that the overall benefits of this approach may exceed its implementation costs also for individual providers. BT Group explained in their response to the 2023 CLI Authentication Consultation that in July 2022 they started to block UK network and Presentation Numbers coming in via their international gateway. [BT Group response](#) to the 2023 CLI authentication consultation, paragraph 4.5.

as Network Numbers. We also expect that any such impact would mostly affect large UK businesses, with small UK businesses less likely to be affected.

- 3.27 With regard to any adverse impacts on businesses due to inadvertent blocking of legitimate calls, the blocking carried out voluntarily by BT Group has indicated that this risk is low. BT Group noted in its response to the 2023 CLI Authentication Consultation that where they engaged with their provider customers, with rare exceptions, the calls were unlikely to be legitimate traffic.

Impact on Crown Dependencies

- 3.28 We do not expect any further impacts on calls from the Crown Dependencies of Jersey, Guernsey and the Isle of Man who also use CLI from the +44 range. In our November 2022 Statement we explained that most calls from the Crown Dependencies enter the UK network via a national interconnect. Therefore, they were not affected by the change to block international calls with UK CLI as Network Number. As calls from the Crown Dependencies should have a +44 number as Network Number, there should not be any additional calls from the Crown Dependencies that have a different number as a Network Number and a UK geographic or non-geographic number as a Presentation Number.

Equality Impact Assessment and Welsh Language Assessment

- 3.29 Our duties under the Equality Act 2010 and the Northern Ireland Act 1998 require us to consider whether our proposals would have a particular impact on persons sharing protected characteristics. We consider that our proposals are likely to have a particularly positive impact on groups of persons that may be more susceptible to scam calls (such as older persons). We have not identified any adverse impacts on specific groups of persons that are likely to be affected in a different way to the general population.
- 3.30 We are also required to take Welsh language considerations into account when formulating, reviewing or revising policies which are relevant to Wales. Our proposals would affect the telephone number consumers would see calling them and we do not therefore consider our proposals have any impact on our Welsh language obligations.
- 3.31 Our equality impact assessment and Welsh language impact assessment are set out in Annex A2 below.

Provisional conclusion

- 3.32 Overall, we believe that this proposed change to the CLI Guidance is justified and proportionate, removing a loophole through which scammers can spoof a UK geographic or non-geographic number when making calls from abroad.

Proposed implementation date

- 3.33 We consider this to be a small change. So that consumers can be protected from calls made from abroad that spoof UK CLI as a Presentation Number, we propose that the change comes into effect six months after the publication of the statement.

Consultation questions

Consultation question 1:

Do you have any views on the potential impact of the proposed change?

Consultation question 2:

Do you agree with our proposed change to Paragraph 4.19 of the CLI Guidance? If not, please explain why.

Consultation question 3:

Do you agree with proposed implementation date of six months after the publication of the Statement? If not, please explain why.

A1. Legal framework

A1.1 This annex provides an overview of the main UK legislative provisions relevant to numbering. It is not a full statement of all the legal provisions which may be relevant to Ofcom's functions or to numbering. The applicable legal framework derives from our duties and powers in the Communications Act 2003 (the Act).

General duties

A1.2 When formulating the proposals in this consultation we have had regard to our general duties including our principal duty under section 3(1) of the Act to further the interests of citizens in relation to communication matters; and consumers in relevant markets, where appropriate by promoting competition.³²

A1.3 In performing our duties, we are required to have regard to the principles under which regulatory activities should be transparent, accountable, proportionate, consistent and targeted only at cases in which action is needed, as well as any other principles appearing to us to represent best regulatory practice (section 3(3) of the Act).

A1.4 Section 3(4) of the Act provides that we must have regard, in performing our duties, to a number of matters, as they appear to us to be relevant in the circumstances, including the desirability of ensuring the security and availability of public electronic communications networks and services and the desirability of preventing crime and disorder.

A1.5 We have also had regard to the Government's Statement of Strategic Priorities³³ in accordance with section 2B of the Act, particularly the Government's commitment to safeguard the interests of telecoms consumers by ensuring they are better protected.

Our functions and powers relating to the telephone numbers

A1.6 Ofcom also has a general duty under section 63 of the Act in carrying out its telephone numbering functions to, among other things:

- a) secure that what appears to it to be the best use is made of the numbers that are appropriate for use as telephone numbers; and
- b) encourage efficiency and innovation for that purpose.

A1.7 Section 4 of the Act requires us, when carrying out our functions, such as the numbering functions, to act in accordance with six requirements for regulation which include to promote the interests of all members of the public in the United Kingdom. We consider that this particular requirement is of particular relevance to the matters under review and that no conflict arises in this regard with any of our general duties in section 3 of the Act.

³² 'Consumer' is defined in section 405(5) of the Act and includes people acting in their personal capacity or for the purposes of, or in connection with, a business.

³³ [Statement of Strategic Priorities](#).

A2. Equality impact assessment and Welsh language impact assessment

A2.1 We consider the impact of our proposal on different groups of stakeholders in Section 3. In this Annex, we set out our equality impact assessment and Welsh language impact assessment.

Equality impact assessment

A2.2 We have given careful consideration to whether our proposal will have a particular impact on persons sharing protected characteristics (broadly including race, age, disability, sex, sexual orientation, gender reassignment, pregnancy and maternity, marriage and civil partnership and religion or belief in the UK and also dependents and political opinion in Northern Ireland), and in particular whether they may discriminate against such persons or impact on equality of opportunity or good relations. This assessment helps us comply with our duties under the Equality Act 2010 and the Northern Ireland Act 1998.³⁴

A2.3 When thinking about equality we think more broadly than persons that share protected characteristics identified in equalities legislation and think about potential impacts on various groups of persons (see paragraph 4.7 of our [impact assessment guidance](#)).

A2.4 In particular, section 3(4) of the Act also requires us to have regard to the needs and interests of specific groups of persons when performing our duties, as appear to us to be relevant in the circumstances. These include:

- a) the vulnerability of children and of others whose circumstances appear to us to put them in need of special protection;
- b) the needs of persons with disabilities, older persons and persons on low incomes; and
- c) the different interests of persons in the different parts of the UK, of the different ethnic communities within the UK and of persons living in rural and in urban areas.

A2.5 We examine the potential impact our policy is likely to have on people, depending on their personal circumstances. This also assists us in making sure that we are meeting our principal duty of furthering the interests of citizens and consumers, regardless of their background and identity.

A2.6 By reducing the number of scam calls from abroad, we consider that our proposals are likely to have a particularly positive impact on groups of persons that may be more susceptible to scam calls (such as older persons). We have not identified any adverse impacts on specific groups of persons that are likely to be affected in a different way to the general population.

Consultation question 4:

Do you agree with our assessment of the potential impact on specific groups of persons?

³⁴ Further detail is set out in section 149 of the Equality Act 2010 and section 75 of the Northern Ireland Act 1998.

Welsh language impact assessment

- A2.7 The Welsh Language (Wales) Measure 2011 made the Welsh language an officially recognised language in Wales. Ofcom is required to take Welsh language considerations into account when formulating, reviewing or revising policies which are relevant to Wales (including proposals which are not targeted at Wales specifically but are of interest across the UK).³⁵
- A2.8 Where the Welsh Language Standards are engaged, we consider the potential impact of a policy proposal on (i) opportunities for persons to use the Welsh language; and (ii) treating the Welsh language no less favourably than the English language. We also consider how a proposal could be formulated so as to have, or increase, a positive impact, or not to have adverse effects or to decrease any adverse effects.
- A2.9 Our proposals would affect the telephone number consumers would see calling them and we do not therefore consider our proposals have any impact on our Welsh language obligations. We expect our proposal will have a positive impact on all UK customers including Welsh language speakers by disrupting scams and reducing customers' exposure to scam calls. This should minimise the anxiety and emotional distress experienced by victims, including Welsh language speakers.

Consultation question 5:

Do you agree with our assessment of the potential impact of our proposal on the Welsh language?

³⁵ See Standards 84 – 89 of [Hysbysiad cydymffurfio](#) (in Welsh) and [compliance notice](#) (in English). Section 7 of the Welsh Language Commissioner's [Good Practice Advice Document](#) provides further advice and information on how bodies must comply with the Welsh Language Standards.

A3. Responding to this consultation

How to respond

- A3.1 If you would like to provide views and comments on the issues raised in this document, please do so no later than 5pm on 28 March 2024.
- A3.2 You can download a response form from <https://www.ofcom.org.uk/consultations-and-statements/category-2/updating-cli-guidance-to-tackle-scam-calls>. You can return this by email or post to the address provided in the response form.
- A3.3 If your response is a large file, or has supporting charts, tables or other data, please email it to scamsconsultations@ofcom.org.uk, as an attachment in Microsoft Word format, together with the cover sheet.
- A3.4 Responses may alternatively be posted to the address below, marked with the title of the consultation:
- Scams consultations
Ofcom
Riverside House
2A Southwark Bridge Road
London SE1 9HA
- A3.5 We welcome responses in formats other than print, for example an audio recording or a British Sign Language video. To respond in BSL:
- send us a recording of you signing your response. This should be no longer than 5 minutes. Suitable file formats are DVDs, wmv or QuickTime files; or
 - upload a video of you signing your response directly to YouTube (or another hosting site) and send us the link.
- A3.6 We will publish a transcript of any audio or video responses we receive (unless your response is confidential)
- A3.7 We do not need a paper copy of your response as well as an electronic version. We will acknowledge receipt of a response submitted to us by email.
- A3.8 You do not have to answer all the questions in the consultation if you do not have a view; a short response on just one point is fine. We also welcome joint responses.
- A3.9 It would be helpful if your response could include direct answers to the questions asked in the consultation document. The questions are listed at Annex X. It would also help if you could explain why you hold your views, and what you think the effect of Ofcom's proposals would be.
- A3.10 If you want to discuss the issues and questions raised in this consultation, please email scamsconsultations@ofcom.org.uk.

Confidentiality

- A3.11 Consultations are more effective if we publish the responses before the consultation period closes. This can help people and organisations with limited resources or familiarity with the issues to respond in a more informed way. So, in the interests of transparency and good regulatory practice, and because we believe it is important that everyone who is interested in an issue can see other respondents' views, we usually publish responses on the Ofcom website at regular intervals during and after the consultation period.
- A3.12 If you think your response should be kept confidential, please specify which part(s) this applies to and explain why. Please send any confidential sections as a separate annex. If you want your name, address, other contact details or job title to remain confidential, please provide them only in the cover sheet, so that we don't have to edit your response.
- A3.13 If someone asks us to keep part or all of a response confidential, we will treat this request seriously and try to respect it. But sometimes we will need to publish all responses, including those that are marked as confidential, in order to meet legal obligations.
- A3.14 To fulfil our pre-disclosure duty, we may share a copy of your response with the relevant government department before we publish it on our website.
- A3.15 Please also note that copyright and all other intellectual property in responses will be assumed to be licensed to Ofcom to use. Ofcom's intellectual property rights are explained further in our Terms of Use.

Next steps

- A3.16 Following this consultation period, Ofcom plans to publish a statement later in 2024.
- A3.17 If you wish, you can register to receive mail updates alerting you to new Ofcom publications.

Ofcom's consultation processes

- A3.18 Ofcom aims to make responding to a consultation as easy as possible. For more information, please see our consultation principles in Annex A4.
- A3.19 If you have any comments or suggestions on how we manage our consultations, please email us at consult@ofcom.org.uk. We particularly welcome ideas on how Ofcom could more effectively seek the views of groups or individuals, such as small businesses and residential consumers, who are less likely to give their opinions through a formal consultation.
- A3.20 If you would like to discuss these issues, or Ofcom's consultation processes more generally, please contact the corporation secretary:
- A3.21 Corporation Secretary
Ofcom
Riverside House
2a Southwark Bridge Road
London SE1 9HA
Email: corporationsecretary@ofcom.org.uk

A4. Ofcom's consultation principles

Ofcom has seven principles that it follows for every public written consultation:

Before the consultation

- A4.1 Wherever possible, we will hold informal talks with people and organisations before announcing a big consultation, to find out whether we are thinking along the right lines. If we do not have enough time to do this, we will hold an open meeting to explain our proposals, shortly after announcing the consultation.

During the consultation

- A4.2 We will be clear about whom we are consulting, why, on what questions and for how long.
- A4.3 We will make the consultation document as short and simple as possible, with an overview of no more than two pages. We will try to make it as easy as possible for people to give us a written response.
- A4.4 We will consult for up to ten weeks, depending on the potential impact of our proposals.
- A4.5 A person within Ofcom will be in charge of making sure we follow our own guidelines and aim to reach the largest possible number of people and organisations who may be interested in the outcome of our decisions. Ofcom's Consultation Champion is the main person to contact if you have views on the way we run our consultations.
- A4.6 If we are not able to follow any of these seven principles, we will explain why.

After the consultation

- A4.7 We think it is important that everyone who is interested in an issue can see other people's views, so we usually publish the responses on our website at regular intervals during and after the consultation period. After the consultation we will make our decisions and publish a statement explaining what we are going to do, and why, showing how respondents' views helped to shape these decisions.

A5. Consultation coversheet

Basic details

Consultation title:

To (Ofcom contact):

Name of respondent:

Representing (self or organisation/s):

Address (if not received by email):

Confidentiality

Please tick below what part of your response you consider is confidential, giving your reasons why

- Nothing
- Name/contact details/job title
- Whole response
- Organisation
- Part of the response

If you selected 'Part of the response', please specify which parts:

If you want part of your response, your name or your organisation not to be published, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

Yes No

Declaration

I confirm that the correspondence supplied with this cover sheet is a formal consultation response that Ofcom can publish. However, in supplying this response, I understand that Ofcom may need to publish all responses, including those which are marked as confidential, in order to meet legal obligations. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

Ofcom aims to publish responses at regular intervals during and after the consultation period. If your response is non-confidential (in whole or in part), and you would prefer us to publish your response only once the consultation has ended, please tick here.

Name

Signed (if hard copy)

A6. Consultation questions

A6.1 The full list of consultation questions is set out below:

Consultation question 1:

Do you have any views on the potential impact of the proposed change?

Consultation question 2:

Do you agree with our proposed change to Paragraph 4.19 of the CLI Guidance? If not, please explain why.

Consultation question 3:

Do you agree with proposed implementation date of six months after the publication of the Statement? If not, please explain why.

Consultation question 4:

Do you agree with our assessment of the potential impact on specific groups of persons?

Consultation question 5:

Do you agree with our assessment of the potential impact of our proposal on the Welsh language?