



**Helplines**  
Partnership

**080 and 116 number ranges:  
Helplines Partnership  
response to consultation on  
proposed dispute resolution  
guidance**

May 2013

## Cover sheet for response to an Ofcom consultation

### BASIC DETAILS

Consultation title: 080 and 116 number ranges: Consultation on proposed dispute resolution guidance

To (Ofcom contact): Elizabeth Gannon

Name of respondent: Sonia Howe, Head of Policy

Representing (self or organisation/s): Helplines Partnership

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

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Whole response

☐

Organisation

☐

Part of the response

☐

If there is no separate annex, which parts?

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### 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.

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☐

Name

Signed (if hard copy)

Helplines Partnership represents the helplines sector across the UK and internationally, supporting helplines to provide the best quality of service to their users. An umbrella organisation with over 400 members, Helplines Partnership is the only membership body for helplines of all sizes and all client groups. Our members provide support via any non face to face channel, (such as telephone, e-mail, SMS, social networking and instant messaging). The wider sector handles 50 million contacts a year. Their turnover is £9 billion annually.

### *Question 1: Do you have any comments on how we have applied these three principles to generate the draft guidance?*

We note the draft guidance, and note particularly the second principle taking into consideration Ofcom's statutory duty to provide benefits to consumers.

While we accept that OCPs should not be denied the opportunity to recover their efficient costs of originating calls to a free to number range, we think that the emphasis on how this is applied should be on promoting efficiency and ensuring that the mobile origination costs of free to caller services are as low as possible for organisations offering socially important services.

Helplines Partnership represents helplines operating socially important services to vulnerable callers. This can include people with mental health problems, complex and multiple needs, debt advice or health issues.

We welcome the proposals to ensure that telephone calls are free for caller for consumers accessing 080 numbers via a mobile phone. This is an extremely important measure. People on low incomes can face multiple challenges, particularly with the wider economic challenges that the country is facing. Some specialist helplines have reported increases in call volumes of over 40% compared with 2012. Vulnerable people should not be put off making a call to seek help.

We know that low income households under 65 (with an income of less than £11,500 a year) are significantly more likely not to have a landline installed in their homes, relying instead on pay as you go mobile phones. People who have landlines generally currently incur no direct cost when accessing 080 numbers from their domestic residences. We view it as unacceptable that the section of society most likely to be currently paying to access 080 numbers is those without the means to do so.

Higher mobile origination payments would be immensely damaging for the helplines sector, and we are glad that Ofcom has identified an acceptable range of charges. We would like to see socially important services receiving charges at the lower end of the scale, and we would like Ofcom to be able to take into account the impact on socially important services as part of the dispute resolution process, directly linked in to Ofcom's second principle of providing benefits to consumers.

Our members are mostly charities, and all of our members operate helplines that have significant benefits for society as a whole by offering access to help and advice. We welcome any initiatives that minimise the impact of helplines, and think that a low level of mobile origination payments along with continuing support for the Special Freephone Tariff would be the best way to address this.