

Consultation response form

Consultation on changes to regulatory framework for Information, Connection and Signposting Services (ICSS)

Please complete this form in full and return by email to consultations@psauthority.org.uk or by post to Sarah-Louise Prouse, Phone-paid Services Authority, 40 Bank Street, London, E14 5NR.

Full name	██████████
Contact phone number	██████████
Representing	Organisation
Organisation name	Department for Work and Pensions (DWP)
Email address	██

If you wish to send your response with your company logo, please paste it here:



We plan to publish the outcome of this consultation and to make available all responses received. If you want all or part of your submission to remain confidential, please clearly identify where this applies along with your reasons for doing so.

Personal data, such as your name and contact details, that you give/have given to the PSA is used, stored and otherwise processed, so that the PSA can obtain opinions of members of the public and representatives of organisations or companies about the PSA's subscriptions review and publish the findings.

Further information about the personal data you give to the PSA, including who to complain to, can be found at psauthority.org.uk/privacy-policy.

Confidentiality

We ask for your contact details along with your response so that we can engage with you on this consultation. For further information about how the PSA handles your personal information and your corresponding rights, please see our Privacy policy at psauthority.org.uk/privacy-policy.

<p>Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential?</p>	<p>Delete as appropriate: Nothing</p>
<p>Your response: Please indicate how much of your response you want to keep confidential.</p>	<p>Delete as appropriate: None</p>
<p>For confidential responses, can the PSA refer to the contents of your response in any statement or other publication? Your identity will remain confidential.</p>	<p>Yes</p>

Your response

Please enter your response to each of the consultation questions in the appropriate box below.

Consultation questions	Your response
<p>Q1. Do you agree with revised wording of ICSS1 as being outcome based and inclusion of the reference to the appearance of organic search engine results including map-based results? If not, why not? Please provide evidence to support your</p>	<p>Confidential? No</p> <p>DWP supports the revised wording.</p> <p>DWP's view is that there is a risk customers can be misled by both the main search engine and map-based search results.</p> <p>DWP believes the proposed change will increase transparency regarding the true nature and cost of using an advertised service, including whom is providing it. The revisions will enable citizens and</p>

reasons.	DWP customers to make more informed choices about which of the listed services to use.
<p>Q2. Do you agree with the proposed amended wording of ICSS2? If not, why not? Please provide evidence which supports your reasoning.</p>	<p>Confidential? No</p> <p>DWP supports the revised wording of ICSS2.</p> <p>DWP is aware that some ICSS website URLs and sub-URLs contain terms or names associated with DWP. These include Universal Credit, PIP (Personal Independence Payment), ESA (Employment and Support Allowance), Social Fund and JSA (Jobseekers Allowance). Examples of ICSS URLs include, but are not limited to:</p> <ul style="list-style-type: none"> • www.incomesupportnumber.co.uk/ • www.socialfundcontactnumber.co.uk • www.contactuniversalcredit.co.uk/pip-helpline/ • www.contactuniversalcredit.co.uk <p>We are concerned that this practice contributes to customers being misled from official sources of information, subsequently incurring unexpected call costs when ICSS numbers are used.</p>
<p>Q3. Do you agree with the proposal to require the specific information listed in ICSS3 to be above the call to action? If not, why not? Please provide any evidence you might have which supports your answer.</p>	<p>Confidential? No</p> <p>DWP supports the proposed principles for clear and prominent display of information on ICSS promotional material.</p> <p>There is a risk that the combination of ICSS call charges and unclear information presents an unnecessary financial burden on vulnerable customer groups that can least afford it. Based on aspects of complaints received by DWP from our customers, we believe the current ICSS3 requirement is not sufficiently explicit about the potential ICSS call costs, connection and cost-per-minute, and the true nature of the ICSS service.</p> <p>Requiring ICSS to clearly and prominently state such information about the service may alleviate concerns we identified during analysis of a sample of ICSS services. Concerns include the advice often 'advertised' on the website did not exist as the calls are routed to DWP with no other ICSS intervention. Similarly, information on ICSS websites was found to be inaccurate or out-of-date.</p>

	<p>Consequently, we believe the Special Condition proposal could go further; ICSS promotional material should:</p> <ul style="list-style-type: none"> • Be explicit about the potential range of call costs, for example “...call costs include connection, which will cost XXp (our service charge). Typically, the cost per minute (access charge) once connected could be up to 55p per minute, depending on the rate set by your service provider”. • Be specific about the nature of the service provided by the ICSS to inform the citizen. When dialling an ICSS number what service will a citizen receive: <ul style="list-style-type: none"> ○ be immediately routed to the official organisation? ○ use an IVR system to be connected or re-directed? ○ speak to an employee of the ICSS in connection with their query? <p>In all instances we believe acceptance of potential call costs should be triggered by a positive action by the citizen by, for example, pressing 1 on the phone keypad to proceed with the call connection. Acceptance of the call costs should not be assumed if the citizen takes no action.</p>
<p>Q4. Do you agree with the proposal to combine ICSS4 and ICSS5 as both conditions are relevant to the same issue and potential for harm?</p>	<p>Confidential? No</p> <p>DWP supports the proposal.</p> <p>We agree that the current ICSS4 and 5 cover similar issues and potential for harm. We are aware of instances where ICSS websites use colour schemes, logos and / or typefaces which are similar to DWP’s. This may contribute to customers using chargeable ICSS numbers instead of directly accessing DWP’s freephone numbers.</p>
<p>Q5. Do you agree that the amended condition should prohibit the use of official logos and marks, as well as imitative logos, marks and other promotional aspects?</p>	<p>Confidential? No</p> <p>DWP agrees that the amended condition should prohibit the use of official and trademarked logos / marks by ICSS.</p> <p>We are aware of instances where ICSS use or imitate DWP logos and colour schemes on their websites. We have also seen the use of official logos in</p>

	<p>sponsored search returns following a search using Google.</p> <p>We believe this practice by some ICSS contributes to customers being misled. Customers may believe, because of logos, marks and colour schemes which imitate DWP's, that they are contacting DWP or an approved partner. Use of logos / marks in this way increases the risk of DWP's customers being nudged away from official information and contact numbers, incurring unexpected call charges.</p>
<p>Q6. Do you agree that the pricing information requirement in this condition should cover those ICSS which have per call tariffs? Do you also agree with the clarification as to the cost and opportunity to refuse being given before a charge is incurred? If not, why not?</p>	<p>Confidential? No</p> <p>DWP supports the clarification and additional scope of the proposed ICSS7 change.</p> <p>We are aware of instances of DWP customers incurring significant call costs, possibly because they did not understand the cost of connecting to DWP via an ICSS number. Citizens must be made aware of the point from which any charge applies, the price range of the charges (<i>i.e.</i> both access and service charges), and they should be given a clear opportunity to decline the potential call costs.</p> <p>Acceptance of the potential call costs should be triggered by a positive action by the citizen by, for example, pressing 1 on the phone keypad to proceed with the call connection. Acceptance of the call costs should not be assumed if the citizen takes no action.</p>
<p>Q7. Do you agree with the proposal to retain ICSS8, ICSS9 and ICSS10 and the amendments made to ensure consistency with the GDPR and DPA 2018? If no, please provide reasons to support your answer.</p>	<p>Confidential? No</p> <p>DWP agrees that ICSS Special Conditions must be brought in line with GDPR and DPA regulations.</p> <p>However, if the Special Conditions allow ICSS to collect personal data then DWP believes there is potential for customer harm and the misuse of data.</p> <p>DWP's view is that we do not consider it appropriate for ICSS to obtain or retain DWP customer or citizen data. We would prefer to see the Special Conditions strengthened to prohibit ICSS collecting DWP customer / citizen data.</p>

<p>Q8. Do you agree that alerts at the start of an ICSS call should clearly state the cost of using the service regardless of the call tariff type? If not, why not?</p>	<p>Confidential? No</p> <p>DWP supports the principle of the proposal.</p> <p>Our primary concerns are that DWP customers are highly likely to be unaware of costs associated with accessing services via ICSS, and the potential harm this does to those who are amongst the most vulnerable citizens.</p> <p>Research by Ofcom and the PSA points towards citizen confusion about the different chargeable elements of non-geographic numbers. Complaints from DWP customers to our Complaints Resolution Teams has provided compelling examples of customer confusion, harm and financial loss in relation to ICSS call charges. Consequently – and in-line with our response to question 3 of this consultation - we believe the Special Condition proposal should go further. Before the citizen incurs any call charges the alert should;</p> <ul style="list-style-type: none"> • Be explicit about the potential range of call costs, for example “...call costs include connection, which will cost XXp (our service charge). Typically, the cost per minute (access charge) once connected could be up to 55p per minute, depending on the rate set by your service provider”. • Be specific about the nature of the service provided by the ICSS to inform the citizen. When dialling an ICSS number what service will a citizen receive: <ul style="list-style-type: none"> ○ be immediately routed to the official organisation? ○ use an IVR system to be connected or re-directed? ○ speak to an employee of the ICSS in connection with their query? <p>In all instances we believe acceptance of potential call costs should be triggered by a positive action by the citizen by, for example, pressing 1 on the phone keypad to proceed with the call connection. Acceptance of the call costs should not be assumed if the citizen takes no action.</p>
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<p>Q9. Do you agree with the assessment of current condition ICSS12 and the proposal to remove it? If not, please provide reasons to support your answer.</p>	<p>Confidential? No</p> <p>DWP supports the proposal. However, as per our question 7 response, we would prefer to see Special Condition changes that prohibit ICSS collecting DWP customer or citizen data.</p> <p>In the context of existing GDPR and DPA 2018 obligations we agree that the proposed revisions to ICSS8, ICSS9 and ICSS10 will provide sufficient clarity to ICSS providers.</p>
<p>Q10. Do you agree with the modification of this condition and the requirement to register all web domains on the PSA Service checker? If not, why not.</p>	<p>Confidential? No</p> <p>DWP supports the proposal.</p> <p>Citizens should have access to clear, unambiguous and up-to-date information about which companies / organisations operate ICSS numbers and websites.</p> <p>The PSA website already enables customers to check telephone numbers against PSA held registration data. The volume of digital, web-based self-service portals continues to expand, so an extension of the registration to include ICSS URLs is an appropriate development of the Condition.</p> <p>Whilst the focus of the Condition is to enable the PSA to hold better information about ICSS providers, DWP would also like to see the new information made publicly available on the PSA website. Citizens will be able to better protect themselves from the risk of unexpected call costs if they can check numbers and URLs on the consumer advice section of PSA's website.</p>
<p>Q11. Do you agree that the proposed additional condition (the new ICSS5), will help to prevent consumers from calling ICSS when they do not intend to? If no, please provide evidence to support your answer.</p>	<p>Confidential? No</p> <p>DWP supports the new ICSS5 proposal, but also believes the proposal could go further in order to protect and inform citizens.</p> <p>The University of Nottingham report, and other research we have read on how citizens process webpage information, makes a convincing case for how citizens review and select webpages.</p> <p>Our own research into a sample of ICSS websites indicated very little consistency in how, and where, ICSS providers display the appropriate service</p>

	<p>notifications. We are concerned that the lack of consistency and prominence of the notifications may contribute to citizens being misled about the true nature and cost of ICSS services.</p> <p>Whilst the principles behind the new ICSS5 proposal will introduce service notification clarity for both citizens and ICSS providers, we believe additional measures should be included, such as:</p> <ul style="list-style-type: none"> • Minimum requirements for font size, font type and font colour (to contrast against background colour of the ICSS webpage) • Internet search engine result links for the ICSS should take the citizen direct to the service description and call costs information, not to another part of the ICSS website • The service description should include, in addition to the current / proposed requirements, the potential range of call costs, for example "...call costs include connection, which will cost XXp (our service charge). Typically, the cost per minute (access charge) once connected could be up to 55p per minute, depending on the rate set by your service provider". The message should be consistent with that required / proposed in question 3 (ICSS3).
<p>Q12. Do you agree with the proposal to apply the proposed Special conditions to all ICSS regardless of the number range they operate on? If not, why not.</p>	<p>Confidential? No</p> <p>DWP fully supports PSA's proposals to apply the Special Conditions to all ICSS number ranges.</p> <p>DWP's view is that there is evidence of harm, both financial and wellbeing, from ICSS to customer groups, some of whom are amongst the most vulnerable citizens in society.</p> <p>We concur with the PSA's view that lower cost tariffs alone do not guarantee greater customer protection. We also agree that if the regulations did not apply to all ICSS there would be a risk of ICSS providers migrating services onto unregulated number ranges.</p> <p>Implementing the proposed Special Conditions changes will improve transparency regarding the true nature of the ICSS service and the potential cost of using an ICSS number. This will enable citizens to</p>

	<p>make more informed choices about which services to use.</p> <p>In some instances DWP believes the proposed changes could go further, bringing additional clarity and strength to the Conditions, and further reduce the impact of ICSS on vulnerable and less digitally able customers.</p> <p>After consideration of the current proposals, DWP continues to be interested in exploring additional opportunities to reduce the potential harm or call costs to the most vulnerable members of society. This could include working with Ofcom and call package service providers to remove / reduce (or include in the 'free minutes' element of call packages) the call connection charges that are a significant element of the cost of a calls made through ICSS. DWP is aware of the Ofcom consultation on the Future of Telephone Numbers and will be submitting a response.</p>
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If you have any supporting imagery for your responses, you can paste them in your responses in the table above or here:

Document attached with examples of DWP related images and colour schemes from ICSS websites:



ICSS Imagery to Support Response to

Submit your response

To send your responses to the PSA please email this completed form to consultations@psauthority.org.uk or by post to Sarah-Louise Prouse, Phone-paid Services Authority, 40 Bank Street, London, E14 5NR.