

# 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](mailto: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	HMRC
Organisation name	HMRC
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](https://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](https://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

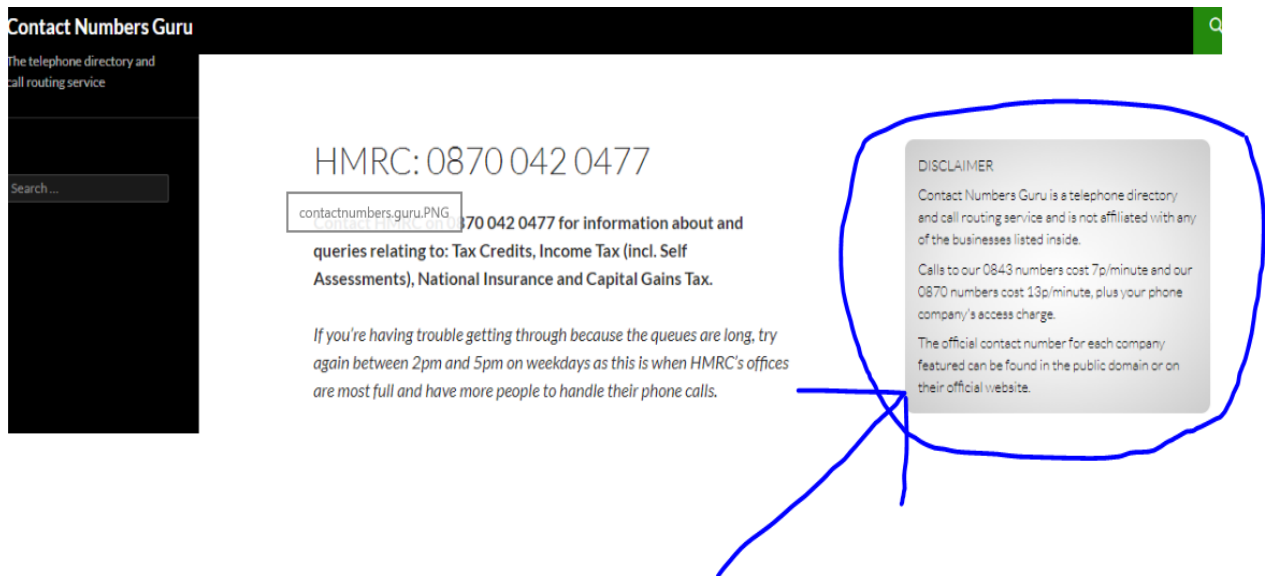
Please enter your response to each of the consultation questions in the appropriate box below.

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 reasons.</p>	<p>Confidential? Yes, However we would prefer the SEM to be prominent, in a large font and bold colour (preferably red) which will act as an initial warning, potentially deterring an individual from visiting the website think that this is an actual Government site. By having this in place, we believe it would lower the traffic and prevent any misunderstanding at the first point of contact.</p>
<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? Yes</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? Yes, We agree with this, however individuals are drawn to the brighter colours and larger fonts, therefore we think that the clickable button (to auto dial on a mobile phone) and banner should not be allowed.</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? Yes Along with the provider name we would like to see a provider address and contact details clearly visible for the company providing the service i.e. BAC Telecommunications, 1 Smith Street, London, SW1 1EQ and a telephone number/email contact. Any legitimate business should be easily contactable and transparent.</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? Yes</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? Yes</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</p>	<p>Confidential? Yes</p>

<p>2018? If no, please provide reasons to support your answer.</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? Yes</p>
<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? Yes</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/ Yes,  How would this be policed? For example if a company set's up a Call Connection site with a domain name of: 'call.HMRC.org.co.uk', would the PSA refuse them permission to operate?</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? Yes,  We would also like it stating that the nature of the service and call charges are in a font larger than that of the rest of the webpage. Also the colour must be black and not a light colour which would be hard to read and not prominent (We have attached below an example where the disclaimer has been deliberately presented in a way that is hard to read and the customer may dismiss it).</p>
<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? Yes,  We have witnessed a large number of the call connection sites changing their numbers to business rate numbers which were previously regulated by the ASA in an attempt not to be regulated by the PSA.</p>

If you have any supporting imagery for your responses, you can paste them in your responses in the table above or here:



Other Comment:

Would it be possible to make these types of sites illegal due to the fact that no service is being provided and a customer would not willingly pay to use a call connection site where the actual company charges a local rate or free service. A lot of these sites rely on imitating government bodies and corporations and trick individuals into using their high priced service.

### Submit your response

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