

# Consultation response form

## Consultation on Service-Specific Requirements for Competition and Voting Services

Please complete this form in full and return by email to [consultations@psaauthority.org.uk](mailto:consultations@psaauthority.org.uk) or by post to Barbara Limon, Phone-paid Services Authority, 40 Bank Street, London, E14 5NR.

Full name	Holly Fairweather
Contact phone number	[REDACTED]
Representing	Organisation
Organisation name	Channel 4
Email address	[REDACTED]

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 [psaauthority.org.uk/privacy-policy](https://psaauthority.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](#).

<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:</p> <p>Nothing</p>
<p>Your response: Please indicate how much of your response you want to keep confidential.</p>	<p>Delete as appropriate:</p> <p>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>Q 1. Do you agree that the proposed amendment to Requirement 3.13.3 clearly sets out what providers must do in respect of valid entries to competitions? If not, please give your reasons.</p>	<p>Confidential? No</p> <p>We recognise that the PSA are looking to future proof the Code but we are concerned that even in the event that it becomes technically possible to ascertain when someone sent in their entry, it would still be problematic to add into the pool of entries an entry that was identified as being sent in during the open period but received after the close date. This would likely need to be a manual process which introduces a risk of human error and it would also require a subjective assessment to be made on what the cut off would need to be for any of these entries.</p> <p>We propose the onus be taken off <i>sent</i> entries and the focus of Requirement 3.13.3 to be on entries <i>received</i>.</p> <p><b>“All valid responses for entry into a competition or vote that are received by the</b></p>

	<b>Provider within the timeframe set out in the promotional material must be entered and afforded sufficient time to be given full and equal consideration.”</b>
Q 2. Do you agree that the proposed amendment to Requirement 3.13.5 clearly sets out when an entry to a competition must be considered invalid and what providers must do to inform consumers? If not, please give your reasons.	<p>Confidential? No</p> <p>The PSA previously verbally indicated that informing consumers how late entries or votes are dealt with could be done in the Terms and Conditions, but this is not reflected in the Consultation. We would welcome clarification that this is still the case.</p>
Q 3. Do you agree that the proposed deletion of Requirements 3.13.11, 3.13.12, 3.13.13 and 3.13.15 remove unnecessary duplication? If not, please give your reasons.	<p>Confidential? No</p> <p>The PSA should consider that the risks identified in 3.13.13 do still exist and as such deleting this Requirement is potentially problematic. For example, competition and vote lines are routinely opened for testing and previously people have voted or entered the competition during this period.</p>
Q 4. Do you agree that the amended Requirements 3.13.3 and 3.13.5 are sufficiently clear that a guidance note is not required? If not please give your reasons.	<p>Confidential? No</p> <p>Agreed providing all feedback is taken into consideration.</p>
Q 5. Do you agree that the proposed revised Requirements in section 3.13 could be implemented by the industry by 2 May 2022? If not, please propose an alternative date setting out your reasons.	<p>Confidential? No</p> <p>That timeframe sounds realistic.</p>

### 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 Barbara Limon, Phone-paid Services Authority, 40 Bank Street, London, E14 5NR.