

**Telephony in DWP and HMRC: an update
- a Supplementary briefing**

The **fair telecoms campaign** has been highly active in relation to DWP, HMRC and the respective select committees (including the Public Accounts Committee) on the matter of telephony. We therefore think it appropriate, and hope it will be helpful, to add some further comments to accompany consideration of the Report by the Social Security Advisory Committee, [Telephony in DWP and HMRC: an update](#) (Occasional Paper No. 17 - July 2016).

Call Costs

The information concerning the cost of calling the various types of number is out of date and potentially highly misleading in its presentation.

1. The minimum cost (if paid) of calling a 084 number is generally around 15p per minute from a landline and around 50p per minute from a mobile. The maximum from a mobile is now 62p per minute. There are some providers who collect the costs for some such calls from all package subscribers making them effectively free to call, but this is a distortion of the market.

Both DWP and HMRC do however now fully comply with the Cabinet Office Guidance (although there are breaches in Northern Ireland), so consideration of use of these numbers is now, happily, firmly off the agenda.

2. The suggestion that calls to 01/02/03 numbers incur a range of costs is highly misleading. The vast majority of such calls are made at no direct cost to the caller. In nearly all cases landline and mobile callers pre-pay for a bundle / package of calls that meets their full requirement in terms of calls to 01/02/03 numbers. This is how telephone tariffs now work; "Normal" calls are made without a call charge.

A penalty charge is however made when calls to 01/02/03 numbers are made outside the terms of the bundle / package. From landlines, this includes a "call set-up" fee (typically around 15p) in addition to a pence per minute rate that is typically greater than the "service charge" imposed for calling 084 numbers. The penalty rate for mobile callers can be extreme.

03 vs. 080

The impact of the latter point is highly significant when it comes to considering issues around the choice between 03 (or 01/02) and 080 numbers.

Given that most calls to 03 numbers are made at no cost to the caller (unless they are of excessive duration) 080 numbers should ONLY be used when it is essential that NO caller ever pays for the call. In every case where a call to a 03 number could have been made at no cost to the caller, use of a 080 number is a gift to the caller's telephone company, which is always paid for such calls.

A sizeable minority of people are misled into choosing the "wrong" call plan or bundle for their needs, so they pay penalty charges for out-of-package calls to 01/02/03 numbers. This applies to all the calls they make, not just those to DWP and HMRC. The break-even point for a fully inclusive call plan is disturbingly low, as the penalty charges for relatively very few short calls readily exceeds the subscription cost – we will be happy to furnish examples to illustrate this point.

We would not wish to see the telephone companies being rewarded with additional revenue (in respect of callers who incur no call charge when calling 03 numbers), by a general switch to 080. This would do nothing to help those who incur unnecessary penalty charges on all of their other calls to 01/02/03 numbers – the real problem.





Universal Credit Initial Claims

The report sadly misrepresents the situation in relation to Universal Credit, repeating a misunderstanding that drew a lot of media attention some months ago.

DWP invariably offers 0800 numbers for new claims that are made by telephone. Subsequent enquiries are made using 03 numbers. With Universal Credit initial claims, the “digital by default” policy has been extended to mean (apart from very particular exceptional cases) “digital only”.

Initial claims for Universal Credit cannot be made by telephone.

One must be reluctant to suggest that a system which has encountered the most appalling series of problems should be further complicated by introducing a “claim by telephone” process. There is however a very strong argument for saying that a 080 number should be introduced specifically for the purpose of dealing with enquiries regarding the claims process.

The principle regarding the exceptional use of 080 numbers for initial claims is that there should never be a cost barrier across the gateway to the benefit claims process. This should be applied to enquiries regarding initial claims both for Universal Credit and for those “benefits” administered by HMRC. This is a particular principle, which will always stand separately from the points made above against a general use of 080 numbers.

Automatic Call Backs

The very high numbers of abandoned calls, along with over-specific menu systems, create the impression that the services covered by the report are more supply-driven than user-focused.

As use of digital means of interaction grow, the need for a telephone based service that is truly responsive to user demand, by enabling interactive conversation, also increases. It is wholly unacceptable to limit access to those who are ready and able to give up large amounts of their time tied to a telephone waiting for an answer. Sensible resourcing of call centres also means that action has to be taken to smooth out the pattern of work across the day.

The fundamental problem with waiting times can never be overcome, because it will never be possible to deploy the necessary volume of agents to meet an unpredictable and variable level of demand immediately. It is therefore necessary to offer a system of calling back at a mutually convenient time. Technology to provide this is widely available and widely used.

The length of delay and the precision with which a time window is offered are both tricky issues that will need to be determined and probably revised in the light of experience, following initial piloting. Channels for deal with urgent matters must also be in place. The importance of effective use of the telephone to conduct a worthwhile exchange between people in relation to a highly important issue means that this option must be explored seriously.

Supporting those with disabilities

Without knowledge of the on-going work, one is a little disturbed to find references to email and other “one-way” communications channels in an item about Telephony. The key point about the telephone is it being interactive. Live text, or video (BSL), chat services are the relevant issues.

