



HMG guidance for customer service lines  
as published 26 December 2013 - annotated

A copy of the HMG Guidance, as published, follows.

This copy is annotated and bookmarked for reference by all *“bodies across the public sector landscape”*, other than central government departments and those directly under their control.

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Relevant text is highlighted and comments are added.

*Use the “Bookmarks” and in Acrobat reader open the “Comment” window to the right of the screen.*

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The issues which are highlighted are as follows:

- The targets of the Guidance
- The principle of using 01, 02 or 03 numbers
- The availability of equivalent 03 numbers for migration
- The option of retaining 084 numbers as alternatives
- Qualifications on use of 0800 numbers
- The Numbers Overview, provided as an annex

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The key point emerging is that normally **only 01/02** (geographic) **or 03** (geographic rate) numbers should be used for customer access to public services by telephone.

This applies to public bodies themselves and external private partners providing services on their behalf.

Those currently using 084 numbers can readily switch to the 034 equivalent numbers.

# **HMG Guidance**

# **Customer Service Lines**

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## 1. Introduction and Scope

- 1.1 This guidance sets out the key principles to assist departments when making decisions on prefix number selection. It aims to achieve greater consistency in the number prefixes used and to advise departments on how to select a number prefix that is appropriate.
- 1.2 The guidance is aimed at central government departments, public bodies that fall within their organisational hierarchy and also services provided by external private partners on behalf of the parent department. **It may also be helpful for other bodies across the public sector landscape.**
- 1.3 It focuses on the choice and use of number prefixes for departments' customer service lines.
- 1.4 The Government's Digital Strategy sets out the commitment to making services 'digital by default', redesigning them so that they are so straightforward and convenient that all those who can use them will choose to do so; whilst those who cannot are not excluded. For those unable to access digital services, the Government's Approach to Assisted Digital<sup>1</sup> sets out how departments will deliver assisted digital services using external providers. For some users a telephony channel may form part of the solution to enable access to a digital service. All services will need to have appropriate assisted digital support in place to meet the Digital by Default Service Standard<sup>2</sup> – the first will be the 25 exemplars which will be digital by default by March 2015. Being mindful of the need for departments to consider digital approaches, this guidance focuses on telephony transactions that continue to support access to Government services and those that may form part of a cross-government assisted digital solution.
- 1.5 These key principles have been produced by a cross-departmental group convened by the Cabinet Office. The group includes operational departments with significant experience in managing telephony policy as well as advisory members from the communications regulator Ofcom.
- 1.6 The group has a standing remit to engage with departments and bodies to monitor implementation of the principles and to ensure this guidance remains up-to-date, reflecting changes in market conditions.

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<sup>1</sup> <https://www.gov.uk/government/publications/government-approach-to-assisted-digital>

<sup>2</sup> <https://www.gov.uk/service-manual/digital-by-default>

- 1.7 The cross-departmental group will consider by spring 2014 whether there are further supporting materials that can be shared to support departments in managing their numbering policy and the performance management of their lines.
  
- 1.8 If you have any queries or comments regarding this guidance or its implementation, please email [customertelephoneguidance@cabinet-office.gsi.gov.uk](mailto:customertelephoneguidance@cabinet-office.gsi.gov.uk)

## 2 Numbering Policy

- 2.1 Departments remain responsible and accountable for their choice of number prefix, supported by an appropriate numbering policy. This section of the guidance sets out a number of key principles for departments when considering which prefix to use, with an overarching principle to ensure the number prefixes chosen are fair to callers.

### Key Principles for Numbering Policy

- 2.2 It is inappropriate for callers to pay substantial charges for accessing core public services, particularly for vulnerable and low income groups.
- 2.3 01, 02 and 03 numbers are all charged at standard geographic rates and are always included in available minutes within call packages. Departments should therefore first consider whether a non-geographic number is required, and if not, use a 01 or 02 prefix. **Where a non-geographic number is needed, departments should treat the use of the 03 prefix as a default policy position for the provision of core public services.** Use of 03 prefixes will require departments to pay charges based on minute volumes. Ofcom has reserved 03 numbers which have a matching pattern to the equivalent 0845 number to aid migration. 
- 2.4 It is recognised that 0845 numbers can provide lower charges for callers than 0345 numbers in certain circumstances from some providers. **Departments could offer both 0345 and 0845 numbers in parallel, allowing the caller a choice based on their call package arrangements. Where this approach is taken departments are encouraged to regard 0345 as their primary number** given it offers more certainty in the long term.
- 2.5 “Free to call” numbers (080) **can be considered in certain circumstances**, for example where a department provides a service to callers who are likely to be part of a vulnerable<sup>3</sup> or low income group, particularly when the typical call duration is long and could result in substantial charges. Such numbers may also be applicable when there is a need to positively reach out and attract telephony contact (e.g. health campaigns). However, departments should be aware that:



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<sup>3</sup> Departments should consider, based on their departmental customer segmentation, the specific circumstances of that service in considering whether the callers could reasonably be considered a vulnerable group.

- Ahead of the implementation of Ofcom's revised regime in 2015, mobile callers can still be charged at a high rate, unless there are special arrangements in place to ensure the call from a mobile is free. Following implementation of the revised regime, these numbers will be free from both landlines and mobiles.
- These numbers will attract higher charges for departments than the use of the 03 prefix.<sup>4</sup> 

2.6 For some exceptional cases, and where departments are delivering “value add” services beyond their core services, it can be possible to justify the use of other numbers to partially or fully recoup the additional cost of that particular service. The DVLA, for example, uses a 09 number for a service line that was introduced at the request of industry, who were prepared to pay for a priority service which checks driving licence details.

2.7 Based on the key principles above, it is reasonable for departments to use different number prefixes for different services. However, overall, departments should seek to ensure they have a clear, coherent numbering policy across their business, avoiding the use of myriad different prefixes where feasible.

#### Alerting Customers to Potential Call Costs

2.8 It is considered good public sector practice to use messaging at the beginning of a call to alert the caller to the possible cost impact, although care needs to be taken about references to specific charges due to the frequency of industry changes and the large number of suppliers involved. Charging will always depend on the caller's personal contract with their provider.

#### Numbering Reviews

2.9 Departments should assess the long term suitability of the number prefixes they choose, and not routinely change numbers or number prefixes. However, numbering policy should still be reviewed at least annually or in the event of a material change to market conditions, such as the implementation of a revised Ofcom regime.

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<sup>4</sup> Currently departments pay this charge for landline calls to 0800 numbers. When the revised Ofcom regime is implemented, departments will also have to pay a charge for calls received from a mobile.

### Monitoring

- 2.10 Departments are required to write to the Minister for Civil Society to explain their rationale for their choice of number prefix for each customer service line if they do not either:
- i. Operate 01, 02 or 03 number prefixes,
  - ii. Offer a dual numbering system, with 03 as the primary number.
- 2.11 The cross-departmental group will monitor implementation of these key principles and publish a status report each year. Departments will be asked to provide or publish timely and comparable information on number prefixes, and we will set out more detail on this before spring 2014.

### Customer Insight

- 2.12 To ensure fairness to callers, departments need to be aware of how call charges work and how this may affect the customer group to which the service is provided. Undertaking customer surveys can provide important insight into the caller demographic, the access route they use and the type of contract they have. This will help to determine what number prefix best fits a service line.
- 2.13 For instance:
- If the customer group typically calls from mobile phones, calls to 084 numbers are not always included in mobile or landline call packages, and charges can be high (e.g. 41 pence per minute) depending on the service provider chosen by the caller.
  - There is evidence that lower income households are more likely than other households not to have access to a fixed line. People on low incomes will also be more likely to use pay as you go arrangements which can be more expensive. Higher mobile and pay phone costs have a disproportionate impact on lower income households.

### Revenue Generation

- 2.14 Some non-geographic numbers (e.g. 0845, but not 03) enable organisations receiving calls to share revenue with suppliers, although it is more standard industry practice for organisations using 084 numbers to receive a reduction in the cost of other services. Being

mindful of the principles above, the table below sets out how departments are encouraged to manage any revenue generated from the use of such numbers.

	<b>Core Services – where there are circumstances, reflecting the key principles, in which departments continue to operate revenue generating numbers for core services</b>	<b>Value-Add Services – where, on an exceptional basis, departments use revenue generating numbers for value-add services</b>
<b>Prior to Implementation of Ofcom's Revised Regime</b>	Departments should recover from their service provider(s) the full amount associated with usage, either directly or by the provider offering other equivalent value services, as long as it will not impact the cost of the call charge.	The revenue should not exceed the cost of the service being provided.
<b>Post Implementation of Ofcom's Revised Regime</b>	Departments should discuss with their service provider the "number block" their non-geographic numbers fall into to avoid taking up any revenue which would push up the cost of call.	The service charge can include an additional amount to contribute towards the cost of the service, and revenue should not exceed the cost of the service being provided.

- 2.15 As part of Ofcom's revised regime, due for implementation in 2015, departments will be required to make clear, wherever a number is advertised or presented, the actual service charge applicable.

### **3 Contracts and Transparency**

- 3.1 In entering and managing contracts with providers, it is important that departments seek to ensure appropriate transparency.
- 3.2 Departments are encouraged to:
- Consider, where the size or complexity of the contract sustains the costs associated, the use of open book arrangements.
  - Enforce open book arrangements where in place.
- 3.3 Departments should seek to ensure they understand the revenue that they are entitled to from any revenue-generating numbers in use, and the revenue that their supplier collects. This should inform how departments manage revenue generated, as set out in paragraph 2.14.
- 3.4 The implementation of Ofcom's revised regime in 2015 will also provide greater transparency by introducing the "unbundled tariff", splitting the access and service charges (Annex A.)

#### **Public Services Network (PSN) Framework Agreements**

- 3.5 The Government Procurement Service establishes framework agreements that allow departments to buy any numbering services through competitions. Buying such services is subject to standard Cabinet Office ICT Spend Controls. Departments are required, when replacing their services, to use these frameworks unless there are exceptional circumstances.
- 3.6 There are currently two extant framework agreements departments may use, each with their own unique characteristics.
- The Telephony Services Framework Agreement<sup>5</sup> is designed for short-term (twelve month) contracts for various voice-related services, including the full range of inbound number services. Given the short-term nature of these agreements there are no price benchmarking facilities available via this route, but there is transparency of how charges are allocated between supplier, customer and department.

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<sup>5</sup> <http://gps.cabinetoffice.gov.uk/contracts/rm1035>

- The PSN Services Framework Agreement<sup>6</sup> is designed for longer term arrangements (up to seven years) and includes provisions that require transparency on charges, full benchmarking and open book facilities which may be used where the size or complexity of the requirement sustains the costs associated with these measures. The standard PSN framework call-off terms and conditions allow departments to require their supplier to provide a full financial model detailing all component costs and charges pertaining to the contracted services. This will enable departments, if managed properly, to have a clear understanding of how revenue generated by certain non-geographic numbers is shared.
- 3.7 Demonstration of value for money is departments' responsibility, working with HM Treasury.
- 3.8 Future PSN Framework Agreements will continue to include a full range of provisions covering transparency and benchmarking appropriate to the nature of the services concerned, and enabling the customer to apply the provisions of their choice.

#### Service Tower Model

- 3.9 PSN has adopted the "service tower" model, separating services into groups based on common functionality (for example connectivity, fixed telephony, mobile, video, conferencing). In this way PSN has sought to bring appropriate commercial transparency into the market, reducing the risk that, by bundling services, component costs are obfuscated.
- Contact Centres are being separated from larger ICT and Business Process Outsourcing (BPO) contracts and acquired under a single contract.
  - The Contact Centre is then typically separated from the 'Call' minutes and 'Lines' that supply the access to the Public Switched Telephone Network (PSTN). The 'Call' based contracts have within them non-geographic numbers which are obtained at best value from the market – through the PSN Frameworks. It is good practice to re-compete regularly call minutes to ensure that charges are still competitive given the way the market can change and the ease of changing supply.

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<sup>6</sup> <http://gps.cabinetoffice.gov.uk/contracts/rm1498>

## Annex A - Numbers Overview

- 1 Non-geographic numbers (e.g. 08, 03) allow organisations to route calls flexibly to locations across the country without the need for multiple geographic contact numbers (01, 02). An organisation can choose to route a call to a different location depending on the time of call or the level of demand for the service. In addition to the simplicity of a single contact number, consumers also benefit from the increased contact hours that the organisation is able to provide as a result of the flexibility of routing calls.
- 2 Some non-geographic numbers (e.g. 0845 and 0844) allow organisations that receive calls to share revenue with suppliers. While there are number ranges, set out in this section below, that permit revenue share generation (designed to contribute towards the cost of the service), in reality these numbers are generally used to allow greater flexibility in responding to callers.
- 3 The 03 range is subject to a regulatory requirement which, unlike 084 numbers, means it must be charged at the same rate as calls to geographic numbers (01 and 02), and it must be included within any call bundles/inclusive minutes offered. Revenue generation is not permitted for this prefix. These rules apply to calls from any type of line including mobile, fixed or pay phone. Customers will therefore always have greater certainty about call charges with the 03 range.

### Call Costs

- 4 All calls have an underlying call cost, whether to the caller or the organisation that operates the number, or both.
- 5 Call packages (and sometimes mobile top up credit arrangements) provide inclusive call minutes and are often selected by consumers as a means of getting best value, although some packages do not cover all number prefixes.
- 6 Inclusive call minute offerings vary widely and these cannot be controlled by departments. Inclusive minutes will always cover geographic number calls (01, 02) and must also include 03 calls. 0845 and 0870 numbers are sometimes included.

However it is recognised that 0845 numbers can provide lower charges for callers than 0345 numbers in certain circumstances from some providers.

- 7 Where callers do not have inclusive minutes cover, charges will apply unless a “free call” number (e.g. 0800, 0808) is used. However, ahead of Ofcom’s revised regime, most landline providers do not charge, but this is not currently the case for mobile providers where charges apply and these can be up to 41 pence per minute. The Ofcom revised regime (to be implemented by June 2015) intends to resolve this by guaranteeing any call to a 080 number will be free to the caller.

### Main Non-Geographic Number Prefixes

Prefix(es)	Cost	Revenue Sharing	Additional Information
03	As per geographic calls with matching discounts and inclusion in bundled minutes.	Not permitted	
0845	Call cost and inclusion in bundled minutes vary by supplier.	Permitted	
0843, 0844	Call cost vary by supplier. Not included in bundles.	Permitted	
080, 0500 <sup>7</sup>	Calls are typically free from landlines, but are mostly charged from mobiles, unless separate arrangements have been made by departments for discreet service lines.	Not applicable	Principally used to offer voice services for helplines. The Ofcom revised regime will guarantee all these calls are free but will require the organisation offering the service to pay for the call, unless their calls are covered by separate arrangements.
0870	Normally as per 03 prefix. Calls may be included in call bundles, but this is uncommon.	Not currently permitted, but will be under Ofcom’s revised regime.	

<sup>7</sup> Ofcom is currently consulting on withdrawing the 0500 range.

0871,0872, 0873	Call costs vary by supplier, not included in bundles. Normally call costs are significantly higher than 084.	Permitted	Not typically used by public sector.
09	Premium rate. Call prices vary widely and can be charged by duration, per call, or by a combination of both. Prices currently capped at £1.53 per minute per call from most landlines.	Permitted	

### Ofcom's Revised Regime

- 8 On 12<sup>th</sup> December 2013 Ofcom announced<sup>8</sup> changes to the pricing of non-geographic numbers (note 03 numbers are not impacted), which will be implemented by June 2015 after an 18 month implementation period. This means changes should occur at the beginning of July 2015. The changes are designed to improve transparency on the charges associated with calling these numbers.
- 9 There are two key changes. The first change requires that 080 / Freephone numbers will be free from all telephones – fixed and mobile. As a result, the caller will have greater clarity regarding the cost of the call. The operator will face additional costs for operating the number, as there will now be a cost to them when receiving a call from a mobile.
- 10 The second change is to introduce an “unbundled tariff” regime to improve price awareness among customers. The “unbundled” tariff will require consistent treatment of all the 084, 087, 09 and 118 number ranges by splitting the charges into:
- (i) **an access charge:** which is paid to the originating Call Provider by the consumer making a call; and
  - (ii) **a service charge:** which is paid to the service provider which uses the number to offer services. This charge will be capped depending on which number prefix is used.

<sup>8</sup> <http://stakeholders.ofcom.org.uk/consultations/simplifying-non-geo-no/final-statement>

The call cost will therefore be an amalgamation of these two elements.

- 11 To calculate the cost, the caller will therefore need to understand what the “access charge” is that will be set by their own provider, and then add this to the “service charge” rate. It is possible that some non-geographic numbers (i.e. 084, 087, 09) may continue to be included in a call plan that the caller has with their own provider.
- 12 Departments will be required to specify the “service charge” rates wherever the number is advertised or presented, and although there is no obligation to include it in call messaging, the cross-departmental group considers this may be a sensible step.
- 13 Ofcom is also currently consulting on withdrawing the 050 range given the low level of consumer awareness of this range. Organisations using a 050 range will be offered the opportunity to use a 080 number which shares the same last 6 digits.
- 14 The revised Ofcom regime will not affect the following types of call:
  - Calls from pay phones;
  - Calls originating outside of the UK; and
  - Business callers, as businesses have the freedom to negotiate individual contracts with their suppliers which would be expected to offer better overall terms.