



The regulatory regime

In response to concerns about the harm that may be caused to consumers by a certain type of ICSS service, **PhonepayPlus** has introduced a new series of regulatory requirements (including a "prior permission regime"). This was finally announced on 24 April 2014 – see [this link](#).

This was aimed at stopping those who present consumers conducting internet searches for government bodies and companies with a more expensive indirect contact number than the direct number which they had hoped to find. In particular it requires announcement of the nature of the 'service' and declaration of the cost of the call, through an 'alert', before onward connection.

In many respects, it could be said that this was very effective, because the majority of the services required to comply with the regulation chose not to continue under these terms

... HOWEVER ...

they simply moved their operations away from the current scope of the **PhonepayPlus** powers, by switching from 087 to 084 numbers.

PhonepayPlus defines ICSS (Information, Connection and Signposting Services) as follows:

"Premium rate services, excluding full national directory enquiry services, that provide connection to specific organisations, businesses and/or services located or provided in the UK; and/or which provide information, advice, and/or assistance relating to such specific organisations, businesses and/or services."

Clearly any call re-direction service, applying a premium charge, would fall within the terms of this definition, as generally understood. There is however a problem, due to the terms of [the "PRS condition"](#) as set by **Ofcom** under the terms of the Communications Act 2003 – section 120.

Many categories of service, e.g. chatlines, internet diallers and "sexual entertainment services", are classified as being "Controlled Premium Rate Services", regardless of the level of the Service Charge which applies. ICSS are not however regarded as such a category.

At present, the only way that ICSS may fall within the scope of the **PhonepayPlus** regulations is by being provided through a type of number (e.g. 087 / 09) which would cause any service to be classed as CPRS, due to the level of the Service Charge (i.e. greater than 7p per minute/call).

This is clearly unacceptable. We make a strong representation to **Ofcom** through our response to the current consultation on Approval of the **PhonepayPlus** Code of Practice (fourteenth edition).

Our recommendation

The terms of the regulatory regime referred to above would be extended to cover ICSS services provided on 084 numbers with the addition of the following line to subsection (e) of section 2 of the "PRS condition" as found on [this page](#):

(vii) the service is an Information, Connection and / or Signposting Service

Such a change must be made to eliminate the "consumer harm" identified by **PhonepayPlus** in justifying its imposition of the regulatory requirements. In some cases, the level of Service Charge alone indicates the nature of the service, justifying classification as a Premium Rate Service. An ICSS is a Premium Rate Service at whatever level of revenue is necessary for it to be sustained.





The ICSS 'rip-off' continues, due to a loophole in regulations

Examples

Without conducting extensive research, we have come upon the following list of websites which offer indirect contact numbers for leading public sector and other organisations, all using 084 telephone numbers with a Service Charge of up to 7p per minute.

4customerservice.co.uk	contactnumbersuk.com	numberconnect.info
all-services.co.uk	contact-numberuk.com	number-direct.co.uk
apustudentgov.com	contact-pages.co.uk	number-directory.co.uk
baseyouthproject.org.uk	contactphone.co.uk	number-finder.com
callcentrenumbers.co.uk	contacttelephonenumber.com	numbers2u.co.uk
callcustomerservice.co.uk	customerserviceguru.co.uk	numbershelpline.co.uk
callphonenumber.co.uk	customerservicenumbers.org.uk	numberssupport.co.uk
complaintscontactnumber.co.uk	customer-services.net	number-talk.co.uk
connectnumber.co.uk	customerservicescontact.co.uk	phoneindex.co.uk
contact-details.info	dial2donate.org	phonenumbershelpline.com
contact-direct.co.uk	directory-services.co.uk	proveicalled.com
contact-number.net	getthephonenumber.com	quickphonenumber.co.uk
contactnumber.org.uk	helpfulnumbers.co.uk	savvy caller.com
contactnumberonline.com	hiddenphonenumber.co.uk	servicecontacts.co
contactnumbers.co	interact-uk.org.uk	telephone-customer-service.co.uk
contactnumbers.guru	leadingnumbers.co.uk	thecontactnumber.co.uk
contact-numbers-uk.co.uk	mobilenetworkguide.com	trustednumbers.co.uk

Public sector bodies covered by pages and listings on these sites include:

Attendance Allowance, Benefit Fraud Hotline, Carer's Allowance, Child Benefit, Child Support Agency, Child Tax Credits, Crisis Loan, CSA, Disabled Students Allowance, Disability Living Allowance, DVLA, DVSA, DWP, ESA, Family Allowance, Harrow Council, HMRC, Home Office, Housing Benefit, Incapacity Benefit, Income Support, Jobcentre Plus, Jobseekers Allowance JSA, Maternity Allowance, Mobility Allowance, National Insurance, NS&I, Passport Office, Pension Credit, PIP, Premium Bonds, Self Assessment, Severe Disablement Allowance, Social Fund, Tax Code, Tax Credits, Tax Office, Tax Rebate, UK Border Agency, UKBA, UKVI, Universal Credit, VAT Helpline, Working Tax Credits

Commercial bodies covered by pages and listings on these sites include:

123 Reg, 247moneybox, 3 Mobile (Three) UK, AA, ABTA, Accord Mortgages, Addison Lee, Admiral Insurance, Adobe, ADT, Aeroméxico, Affinity Sutton, Affinity Water, Ageas, Air China, Air France, AirBNB, Alton Towers, Amazon, American Express, American Golf, Amigo Loans, Anglian Water, AO, AOL, Apple, Aqua Card, Argos, Arnold Clark, Arriva, ASDA Direct, ASOS, ATG Tickets, Atos, Auto Trader, Autoglass, Avios, Avis, Aviva, Avon, AXA Insurance, B&Q, Bank Fashion, Bank of Scotland, Barclaycard, Barclays, Belkin, Bell Insurance, Bet365, Betfred, BHS, Birmingham City Council, Blue Arrow, BMW, Boohoo, Booking.com, Boots, BOSE, Bright House, Bristol Hippodrome, British Airways, British Gas, Brother customer service, BT, BT Openreach, BT Sport, Budget Rent a Car, Budgeting Loan, Bupa, Butlins, Camp America, Capital One, Carphone Warehouse, Cash Converters, Churchill, Citylink, Clerical Medical, Close Brothers, Collect Plus, Companies House, Congestion Charge, Costco, CRB, Credit Expert, CSCS, Currys, Debenhams, Deliveroo, Dell, Deposit Protection Service, DFS, DHL, Direct Line, Dorothy Perkins, DPD, DSA, E.ON, EA Sports, EasyJet, eBay, ebookers, Ebuyer, eCar Insurance, Economy Energy, Edexcel, EDF Energy, eDreams, EE, eHarmony, EHIC, Elephant Insurance, Emirates, Endsleigh Insurance, Ents24, Epsom, Equifax, Equiniti, Esure, Eurostar, Eurotunnel, Expedia, Experian, First Choice, First Direct, First Utility, Flux Direct, Freemans, General Insurance, GiffGaff, GoCompare, GoGroopie, Google Play, Green Flag, Groupon, Gumtree, Halifax, Hastings Direct, Haven, Healthy Start, Hermes, HMRC, Holidays Gems, Homeserve, Hoover, Hotmail, Hotpoint, HSBC, HUMAX, HWDC, Iberia, iD Mobile, Ingenie, Insurance Choice, Insure The Box, Interflora, Interlink, Interlink Express, iPostParcels, Isme, iTunes, Jacamo, Jet Airways UK, Jet2, John Lewis, Just Eat, KLM, Knowhow, Lebara, LG, Littlewoods, Liverpool FC, Liverpool Victoria, Living Social, Lloyds Bank, Lovefilm, Lufthansa, LV Insurance, Lycamobile, Manchester United, Marisota, Marks and Spencer, Match.com, MBNA, McDonalds, MCE Insurance, Megabus, Metro Bank, Metrolink, Missguided, Moneygram UK, More Than, Mothercare, myHermes, N POWER, National Rail Enquiries, Nationwide, Natwest, NEST Pensions, Netflix, Next, Nissan, Noddle, Northumbrian Water, Norton, O2, On the Beach, Openreach, Orange, OVO Energy, Pact Coffee, Paddy Power, Parcelforce, Parking Eye, PayPal, Petplan, Phones 4 U, PlayStation, PlusNet, Power NI, Protect Your Bubble, Pure Gym, Qatar Airways, Quick Quid, Quotemehappy, RAC, RBS, RCI Financial Services, River Island, Royal Mail, RSPCA, Ryanair, SAAS, Sainsburys, Samsung, Santander, Satsuma, Scottish Equitable, Scottish Gas, Scottish Hydro, Scottish Power, Scottish Widows, See Tickets, Selfridges, Sixt, Sky, Sony PS4, South West Water, Southall Travel, Southern Electric, Spark Energy, Specsavers, Sports Direct, Student Finance, Superbreak, SWALEC, Swiftcover, Talk Talk, Tesco, TGI Friday's, Thames Water, The Co-Operative Group, Thomas Cook, Thomson, Three, Ticketmaster, T-Mobile, Toshiba, Traveler, Travelodge, TV License, UCAS, UK Mail, United Utilities, UPS, Utilita, Utilita, Utility Warehouse, Utility Warehouse, Vanquis Bank, Very, Viagogo, Virgin Atlantic UK, Virgin Media, Virgin Mobile, Vodafone, Wage Day Advance, Wessex Water, Whistl, Wickes, Wonga, Wowcher, xBox, Yodel, Yorkshire Bank, Yorkshire Water, Zara, Zenith Insurance, Zoopla

A search including any of the above, along with words like "contact" "customer service" or "phone" is highly likely to bring back one or more offerings from the sites listed above.

