fair telecoms campaign **open message**

The fair telecoms campaign position on Nuisance Calls

Introduction to this Open Message

The briefing which follows was prepared for the Minister for Digital and the Creative Industries and her officials.

It lays out our position on Nuisance Calls, highlighting views and suggestions that warrant consideration by the government and DCMS in particular.

Our Campaign to End Nuisance Calls includes demands that are targetted far more widely. These are referred to in this briefing, in the hope of gaining support in principle for the need for action by others.

This briefing is published, as an "Open Message" for the purpose of publishing our position, as outlined, rather than as a means of holding anyone to account for delivery in response.

We are grateful to the Minister and her officials for seeking our views and we trust they will be found to be informative and useful.

We do not however expect them to receive any more attention than similarly well-informed and well-considered views from any other party.

David Hickson

Tuesday, 5 March 2019

fair telecoms campaign **briefing**

The fair telecoms campaign position on Nuisance Calls

This briefing is prepared to support comments made in exchanges of emails and private discussion with the Minister for Digital and the Creative Industries and her officials.

In that context, it provides a comprehensive briefing on the topic, as at the date of publication. Further development of our position and reaction to possible external developments will be covered by further publications.

It includes direct links to published materials. A comprehensive catalogue of all recent relevant published materials, along with media publications and broadcasts, is appended.

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Preface - Summary of proposed action by DCMS

This document is intended primarily to outline the position of the fair telecoms campaign, supported by detail on how we came to form it.

It may however be useful to indicate the general and specific action suggested as being required by the Minister and her team.

The following points include links to the relevant portion of this document.

- **ft** Please clarify the state of play regarding the availability and dispersal of government funding in relation to individual victims dealing with the issue of "Nuisance Calls" .
- **ft** Note the importance of deployment of the **trueCall** approach, in many ways, as the only proven effective way for individuals to protect themselves from Nuisance Calls.
- **ft** Develop and publish a clear policy on the extent to which "cold calling" is seen as a proper and permissible means of direct marketing. This is necessary to explain the qualified tolerance of this activity, which exists in current legislative provisions, despite contrary indications.
- **ft** Having switched to an opt-in approach in respect of "Claims Management" and "Pensions", consider the reasons (if any) for retaining an opt-out approach in respect of cold calling on other topics – notably investment schemes targeted on those with pension pots that may be released as cash.

Indirect action

The following points recognise that there is much that can be done to address the issue other than through statutory provision, under the unduly liberal provisions of the relevant EU directives and regulations. We see no place for the "consent" provision to cover "unsolicited" telephone calls.

Whilst the government is constrained in what it may do by proposing legislation, it may encourage others to act in line with general government policy.

These following points represent the three demands of our Campaign to End Nuisance Calls.

- **ft** Sectoral regulators may apply and enforce a total prohibition on cold calling as a marketing technique.
- **ft** If utility providers (e.g. banks, communications providers) were to declare cessation of the practice of making unexpected telephone contact with customers, opportunities for scammers would be seriously diminished.
- **ft** Deployment of the **trueCall** approach by all network telephone providers (mobile and landline) would make an enormous difference to the extent to which Nuisance Calls have an impact.

The government position on the propriety of "cold calling"

We invite the government to consider carefully the positive position that it wishes to promote, regarding use of the telephone call, and other "electronic" means, for the purpose of unsolicited direct marketing.

The **fair telecoms campaign** holds the view that there are no circumstances under which "unsolicited direct marketing" should be undertaken by telephone calls to home phones or personal mobiles. This is explained in full below. We nonetheless recognise that, despite numerous public comments, this is not the position of the government.

Notwithstanding the political imperative to be seen to be acting against those who cause nuisance or engage in scams, we believe that the government should present a positive policy outlining the extent to which it supports "cold calling", at difference with our view.

We regard an "unsolicited" call as being one that has not been specifically requested to be made at a particular time (or within a defined period) by a particular caller to discuss a particular topic.

This concept of "solicitation" is often muddled up with that of "consent". We see the concept of consent as having great value in relation to the use and distribution of personal information which has necessarily been provided to a "data controller", under the terms of the Data Protection Act.

We however see the issue of "cold calling" as being a matter of business process, rather than data protection. **Baroness Altmann** is perhaps the most prominent supporter of this view – see this clip from a speech in the House of Lords (the Baroness expounds this principle, applies it a specific issue and acknowledges a source of briefing).

"Unsolicited" "marketing" with "consent"

The purpose and nature of "marketing", in general, is to bring available products and services to the attention of those who are likely to be unaware of them.

If however the conduct of a particular type of marketing activity has to be subject to explicit consent, this begs the question of how it may ever be carried out! To give consent, the target has to, at the very least, be aware of the organisation that may contact them. This therefore distorts any market in favour of well-established providers – a most anti-competitive policy position.

Furthermore, if a potential consumer is to approach a particular provider to offer consent to receipt of marketing information, this is highly likely to be by way of soliciting such information.

These points demand some consideration of how one may intelligently operate a regime whereby "unsolicited" direct marketing is subject to consent. This may be just a roundabout way of ineffectively trying to prohibit the practice. If not, then what exactly is one trying to achieve?

Implementation of EU regulations

We recognise that the government is constrained by the terms of the present EU Directive and will be similarly constrained if the "**E-Privacy Regulations**" (**ePR**) come into force whilst the UK is obliged to adopt them.

The **Data Protection Act 2018** provided an opportunity to apply refinements to the relevant policy. It would initially have been expected that this Act would have to cover implementation of the **ePR**, a companion to the **GDPR**, however these are not yet in place.

The current government nonetheless declined the opportunity to remove two respects in which "gold plating", from the perspective of business i.e. against that of citizens, was applied by the government in 2003.

Firstly, doubtless under pressure from the **DMA** at the time, the **PECR** was prepared to use the option to apply an "opt-out" regime to attended telephone calls, using the then voluntary **DMA Telephone Preference Service** as the legal opt-out mechanism. 15 years on, and with awareness of the ineffectiveness of the limited regime that is in place, this is retained and even promoted.

Rather than presenting two alternatives (opt-in / opt-out), the **ePR** start with the assumption of "opt-in". The current draft however includes the possibility for a member state, with an "opt-out" regime already in place, to retain it.

Assuming that the UK is subject to these regulations when they come into force, a decision will then have to be made as to whether to retain the current (opt-out) regime – which only applies to attended telephone calls – or to finally abandon it altogether. This decision has been deferred.

Secondly, the concept of a "soft opt-in" was adopted, across the board. This notion of "implicit consent" is effectively removed by the terms of the **GDPR**. This removal will be formally extended to cover electronic communications through implementation of the **ePR**.

This option, a strong feature of **PECR #21B**, will be lost under the **ePR** – should it ever apply!

Recent adjustments through legislation

As each has emerged, we have remarked on each of the many tweaks made to the terms of **PECR** over recent years. This briefing only addresses the most recent, however a guide to all those on which we have commented is found at 'Ineffective tweaks' to the regulations said to be intended to "rid society of the plague of nuisance calls".

The effectiveness of the enforcement of compliance with the terms of **PECR #19-22**, as undertaken by the **ICO**, must be open to question. This thereby makes any public reference to a "ban", in the context of a relatively minor adjustment to the relevant provisions, to be questionable.

Breaches of **#22** (covering text messages and email) are commonplace – this is what "spam" is. Extensive procedures to protect victims from email and SMS spam are offered by various service providers. Interventions in respect of breaches, especially in relation to emails, are however very rare. Any suggestion that the provisions of the **PECR** amount to an effective "ban" cannot be taken seriously. Such a suggestion must be set alongside the equivalent statement that **spam is banned**.

In respect of **#21**, one may note the very recent case of Alistar Green Legal Services Limited. Action taken on 30 January 2019 related to 213 calls made between March and July 2017. The **ICO** noted 25,793 complaints about "live calls" during that period. 0.8% of the **known** problem was thereby addressed by this action, at least 18 months after the event. This example of the effectiveness of the "ban" must challenge use of this term – what about the other 99.2% and the 18 month delay!

The two specific recent tweaks to the body of the PECR

This section addresses **PECR #21a** and **#21b**. These are covered by our briefing – Why the so-called "bans" on cold calling in respect of claims management and pensions are overhyped.

These moves do no more than apply an "opt-in" regime in respect of attended telephone calls for the specific areas which they cover. This principle already applies to all automated telephone calls, faxes, text messages and emails. It also applies to attended telephone calls in cases where the target has registered their number with the **Telephone Preference Service**.

These moves therefore only cover a relatively small minority of cases – attended calls to numbers not registered with **TPS**. We are concerned about the degree of hype given to them, implying that something far more extensive was being done to change the law – a new "ban".

Implication of a contradictory government policy

It is concerning that, as these moves imply a government policy in favour of an "opt-in" regime, this has not been applied across the board. Citizens are urged to register their numbers with the **TPS**, but the need to do so has been removed only in respect of two particular areas.

Insofar as the regime may be effective, it appears absurd to leave the "opt-out" regime in place for attended telephone calls that do not relate to Claims Management and "Pensions".

Given the context, it seems ridiculous to retain the "opt-out" regime, for calls about financial investments targeted on those with funds from a withdrawn pension pot to invest. This is however explicitly stated as being government policy (see 2.10 and 2.11 in the Regulations to ban pensions cold calling: consultation response).

Furthermore, the concept of the "soft opt-in" is reinforced explicitly in **#21b (3)** by the reference to "an existing client relationship". It may be noted that no such provision exists in the basic **#21**, which it thereby contradicts. Such considerations are however made by the **ICO**, by improperly carrying over the soft opt-in provisions, found only in **#22 (3)**, to other regulations.

In addition to the general briefing referred to above, our views on these two measures were widely covered by the media. Selected examples are given below:

- An opinion piece in the Daily Telegraph

Our media comments on 21A – Claims Managament

- On Radio 4 Today (our views are attributed to "campaigners")
- On Radio 4 PM
- On Sky News
- On BBC News
- In the Daily Telegraph

Our media comments on 21B - Pensions

- In the Financial Times
- In the Sunday Express

The imposition of penalties on company directors

We appreciate the embarrassment caused by the ease with which company directors have escaped civil financial penalties imposed on companies they control, and recognise the PR benefit behind an announcement that personal liability could be applied to corporate wrongdoing.

We nonetheless would remark that there are areas of far greater public concern in which it may be thought desirable to apply personal, as opposed to corporate, responsibility. We are however aware of the considerable legal issues that impede any serious move in this direction in law.

Our general reaction is however to note how disappointing it is to find that exceptional (and legally dubious) approaches have to be taken to perhaps prop-up a failed regime. Any regulatory regime must have securing compliance as its primary objective. Any imposition of a penalty for a breach of a regulation must therefore be essentially regarded as a failure.

We offered our comments on this specific proposal, along with the wider issues, in our – Response to: Tackling nuisance calls and messages - Consultation on action against rogue directors. It is also covered in this news release – Pressing on with our 'campaign to end nuisance calls'.

Our views were also broadcast through:

- this contribution to BBC Wales coverage of the issue
- this interview on the Victoria Derbyshire Show

(N.B. The nature of media contributions demands the repetition of points and covering general issues, relevant to those specifically being discussed. Although links have been provided against specific topics in this briefing, most of the contributions include oft-repeated views.)

The Direct Marketing Code of Practice

One of the most perverse provisions of the **Data Protection Act 2018** is **Section 122**. This suggests that, because of its role in relation to electronic communications, the **ICO** should fully regulate Direct Marketing practices across all industry sectors, through a Code of Practice.

Previous similar **ICO** publications have been restricted to offering guidance only on how to avoid breaching the terms of the **PECR**. It seems absurd and inappropriate to translate this into positive guidance on how to conduct business.

See our response - Response to: ICO call for views on a direct marketing code of practice. This, through general comments and responses to specific questions, provides extensive commentary on the role of the **ICO** and the nature of the relevant regulations.

In many ways, the absurdity of the **ICO** being supposedly commended as a source of reference on how to conduct business highlights one of the key points we seek to make.

The **ICO** has an important role in encouraging and enforcing compliance with statutory regulations that protect data which is obtained and held by organisations for a variety of valid reasons.

It does not however have any responsibility for settings the terms under which business can be, and should be, conducted, nor would it pretend to hold the necessary knowledge of markets nor the capacity to fully engage with stakeholders in developing appropriate Codes of Practice.

Determination of how Direct Marketing may and should be conducted in any specific sector, along with the publication of, and enforcement of compliance with, any relevant Code of Practice must primarily (if not exclusively) be the responsibility of the respective sectoral regulator.

Such regulators are free, empowered and have a duty to construct, impose and enforce a regime that is appropriate for all stakeholders in the relevant sector. Whilst some sectors have no such regulator, the majority of reported Nuisance Calls derive from sectors where either a statutory or widely-followed voluntary regulator is in place.

It has always been our view that the **ICO** may have a "longstop" role in this regard, covering unregulated sectors and ensuring compliance with regulations regarding data necessarily held for some legitimate purpose. This is well suited to the nature of its powers and methods of operation. We believe that the longstanding failure to deal effectively with the problem of Nuisance Calls has been largely due to this responsibility being retained exclusively by a "longstop" regulator.

Codes of Practice for Direct Marketing should focus on the means and methods followed, not simply the source of data used. They should also deal with leads obtained through Direct Marketing undertaken by third party organisations (potentially outside the UK, unregulated for other reasons or in breach of relevant regulations). Such Codes of Practice, and associated regulatory provisions, must take relevant statutory requirements as their starting point – not the entirety of their scope.

In our view, all such Codes of Practice should totally prohibit "unsolicited" telephone calls to home phones and personal mobiles, wholly dismissing the concept of "consent", as distinct from solicitation. There should also be proper, perhaps lesser, constraints on B2B communications and approaches by means that do not demand an immediate interactive response (e.g. emails).

Measures for individual protection by citizens

Recognition of the failure of the regulatory regime to address the issue of Nuisance Calls has led to many measures being offered to assist potential victims. These are to support measures taken by the victims themselves, many of which are misguided or diminish happy use of the telephone.

One significant measure has been the abandonment of use of landlines, due to the fact that most unsolicited direct marketing is currently directed at landline numbers, for a variety of reasons.

Another has been attempts to avoid nuisance calls by failing to answer calls where the CLI offers no number or a number that is not recognised. Whilst failing to answer calls, or disconnecting telephone service altogether, is bound to avoid receipt of nuisance calls it also leads to wanted, and in some cases important, calls not being received.

Number display and call-back

We note that the government supposedly supports the notion that potential victims will be able to effectively block nuisance calls if all those engaged in unsolicited direct marketing provide an effective number for a return call through CLI. This legislative provision, it is said, makes it easier for those breaching the terms of the **PECR** to be reported and penalised.

This notion is based on some questionable assumptions. Firstly, that law-breakers will enable their detection and punishment by identifying themselves. The question of how those who breach the requirement to identify themselves will be identified and punished obviously comes to mind.

Secondly it ignores the fact that there is no real difference between an unrecognised number and no number at all, for those with a CLI display device (automatically provided on mobile phones). Thirdly, we would always encourage people never to make a telephone call unless they know who it is they are calling – this is especially true when using the callback feature. Fourthly, it ignores the fact that a number of telephone companies offer ranges of numbers in each of the dialling code areas, simply to be used as presentation CLI, to emulate a local call.

Call blockers

A further significant development has been systems and devices that selectively block calls thought likely to be a nuisance. These are offered for purchase or subscription (often free) by those who wish to have this alleged protection from nuisance.

The selection of which calls to block is arbitrary and, for commercial reasons, confidential.

It is well known that many calls that probably should not be blocked end up on these lists. This arises from poor judgement on the part of those who compile the lists on spurious or ill-considered grounds. It can also arise when responsibility for the compilation of lists is passed to subscribers, who cannot be expected to take full responsibility for making a sound judgment about whose calls should always be blocked.

Whilst the **fair telecoms campaign** cannot object to the benefit that these approaches may deliver, we must deplore the down-side effects and the general sense of excessive distrust which is generated by promotion of these systems and devices.

We are also unhappy that telephone service providers, **BT** in particular, claims to have invested considerable sums in the development of systems (such as **BT Call Protect**). They do not however share the evidence they have collected – allegedly of illegality – with the relevant authorities, i.e. the **ICO** and the Police (through **Action Fraud**). Furthermore, commercial confidentiality and reasons of competitive advantage prevent them sharing evidence that may prevent the customers of other providers suffering a source of public nuisance or criminality.

We have suggested, in outline, proposals for a means of sharing information around the industry, and with enforcement bodies, in a way that does not discourage investment in appropriate technologies. In the absence of any indications of support, we are no longer directly pursuing these ideas. We nonetheless stand ready to bring these back to the table in any suitable forum, and to work on them, given appropriate support or encouragement.

A major concern about this approach is the implicit assumption that those who are alleged to have caused nuisance should be denied the right to make calls on the telephone network.

Ofcom has powers, under **sections 128-130** of the **Communications Act**, to deal with those who misuse the telephone network. These are potentially more severe and are more readily applied than those available to the **ICO** under the terms of the **PECR**, not least because they are wholly discretionary.

If this is the type of remedy that should be applied, then the "**persistent misuse**" powers held by **Ofcom** are the proper mechanism, and these should be used to apply it.

Developments supported by DCMS

We understand that only £500,000 of the £3.5M allocated in the Budget of 2015 has been put to effective use to this purpose. This has been used by **National Trading Standards** to fund local authorities issuing **trueCall** devices to vulnerable citizens.

We now understand that an additional £650,000 has been allocated to this project for 2019/20.

We are however very keen to know how the remaining £3M is to be, or has been, used, and of what benefit may be derived in future from any amounts that have been spent or allocated.

The government appears to share our view that the approach adopted and applied in the **trueCall** device provides considerable benefits, unrivalled by any other idea in the public domain.

We comment below on our belief that the design concept deployed in this device (not simply the device itself) represents the only proven and effective approach to enable contented use of the home phone and personal mobile, free from all unwanted calls.

Notwithstanding any proprietary claims on this concept, we believe that this approach must be promoted in deployment as widely as possible. There may be other concepts worthy of similar support, but they have not yet come to our attention.

Deployment of the "trueCall" approach

The **trueCall** device has many features, however its key feature is to provide the capability to only receive and accept wanted telephone calls.

This is achieved firstly by holding a list of the numbers from which all calls will be put through directly. This can be set by entering the numbers, or by acknowledging that the number associated with the current call should be added to the list. There is also a feature to invariably block specified numbers, including that associated with the current call.

Because wanted calls may be made from unrecognised numbers, or perhaps with no CLI being provided, there is a facility to allow these calls to get through. This is vital to cover many "real world" situations and to avoid the fear of nuisance calls preventing happy use of the telephone.

All callers from "unlisted" numbers are challenged with a (customisable) voice prompt to briefly state who they are and the reason for their call. This happens before the phone rings. If there is a response to the challenge, the phone rings and the response is played, without the caller being connected. There is then the opportunity to:

a) Accept the call.
b) Accept the call and add the number to the "white" list.
c) Direct the call to an answering service.
d) Reject the call and add the number to the "black" list.

Rejecting the call causes the caller to hear a (customisable) message.

Versions of the **trueCall** device also include many other features. What is described above however represents the essence of what may be called "The trueCall approach".

This approach (actually the **trueCall** technology under licence) is already deployed on all mid- and upper- range handsets provided by **BT**, sometimes under the brand "**Call Guardian**". It is also similarly deployed on a number of other landline handset devices across the world.

This approach is also deployed by **Talk Talk**, as "**CallSafe**", and **Sky Talk**, as "**Sky Talk Shield**". In both of these cases this feature is offered at no charge.

Essentially, there is no reason why this approach could not be deployed on all networks and / or handsets - both landline and mobile.

As always, the qualifier "essentially" means that there may be surmountable obstacles to be overcome. We nonetheless believe that with help and support from the government (potentially including dispersal of funding already committed to the purpose) a near to complete roll-out could be achieved.

This would not wholly remove the need to deploy the advanced "care" version of the **trueCall** device in the most severe cases, as covered by the **National Trading Standards** scheme. It may however reduce demand from cases where the basic facility provides sufficient relief.

This should do nothing to ease the pressure on steps to apply and enforce necessary and effective prohibition of unsolicited direct marketing by telephone. Whilst the **trueCall** approach is highly effective for those who are troubled by unwanted calls, many of us (including myself) are able to tolerate a little nuisance in return for all callers being able to get through unchallenged. We are nonetheless entitled to protection from unsolicited direct marketing calls.

The "Campaign to End Nuisance Calls"

We have laid out our campaigning objectives for this issue in the form of three specific demands – see The Campaign to End Nuisance Calls - our three demands.

These cover action in respect of all "Nuisance Calls", not just unsolicited direct marketing. The demanded action involves many different parties.

The second demand is intended to address a general concern, but specifically the current attempts to gain access to victims' computers, on the false basis of a "Service Call" from their broadband provider. This was published in a recent Mail on Sunday article.

In conclusion

As a positive campaigning group, we seek effective steps to improve behaviour and enhance experiences in the world of telecommunications. We respect and support the work of regulators.

As stated many times, we see the issue of Nuisance Calls as being essentially a matter of business process, rather than an issue of personal privacy. Where personal data that has been obtained for a proper purpose is used or distributed improperly, then that is a data protection issue.

I cannot accept that if someone takes my telephone number from the published directory and calls me, then my privacy is being invaded. Businesses should be subject to proper regulation of their marketing practices, which should prohibit them from calling me uninvited. I would go further in suggesting that a telephone call is rarely the best way to contact me about any service issue, unless I have specifically requested this method of contact for a particular purpose.

Catalogue of recent relevant published materials

Briefings, News Releases and Open Messages

22 Oct 2017	Open Message	Urging support for amendments to the Financial Guidance and Claims Bill to stop Nuisance Calls
23 Oct 2017	News Release	New law to ban cold calling for Accident and PPI Claims etc. being debated in House of Lords on Tuesday 24 October
24 Oct 2017	News Release	Victory in the House of Lords - Government agrees to ban cold calling for Claims Management and Pensions
29 Oct 2017	Briefing	Further briefing on action to prohibit Claims Management (and other financial services) cold calling
02 Nov 2017	News Release	Do you trust the government to ban cold calling?
16 Nov 2017	Briefing	Prohibiting Telephone Cold Calling in the Financial Services sector
14 Jan 2018	Briefing	Response to FCA Consultation – 'Our Future Approach to Consumers'
17 Jan 2018	Briefing	The Financial Guidance and Claims Bill - MP briefing
18 Jan 2018	News Release	Financial Guidance and Claims Bill must compel FCA to ban cold calls
26 Jan 2018	Briefing	Banning Cold Calling through the terms of the Financial Guidance and Claims Bill
02 Feb 2018	News Release	Better to stop nuisance calls being made now and in future, than only punish for those made 2 years ago – elementary?
09 Feb 2018	Briefing	Debate on alternative proposals relating to Cold Calling by Claims Management Companies
15 Feb 2018	News Release	Another example of why direct regulators, e.g. the FCA, must ban cold calling, rather than relying on the powers of the ICO
24 Apr 2018	Briefing	Financial Guidance and Claims Bill – Report Stage 24 April 2018 – MP Briefing (Banning Cold Calling)
16 May 2018	Briefing	Guide to the "ban" on Cold Calling in the Financial Guidance and Claims Act 2018
11 Jun 2018	News Release	No Cold Calling ban for Claims Management companies
14 Aug 2018	Briefing	Why the so-called 'ban on pensions cold calling' is not what it pretends to be
14 Aug 2018	News Release	Is Pensions Cold Calling to be "banned", or is it just a matter of "buyer beware"?
15 Aug 2018	Briefing	The FCA and banning cold calling
17 Aug 2018	Consultation Response	Response to "Ban on cold calling in relation to pensions: consultation on regulations"
22 Aug 2018	Consultation Response	Response to: Tackling nuisance calls and messages - Consultation on action against rogue directors
10 Sep 2018	Briefing	Media coverage of a government announcement about Nuisance Calls made on Saturday 8 September 2018
25 Sep 2018	News Release	The actual steps needed to "end the blight of nuisance calls"
30 Oct 2018	News Release	Budget unravels - No pensions cold calling ban
18 Nov 2018	News Release	No fanfare for the introduction of Directors' liability for Nuisance Calls
30 Nov 2018	Briefing	Comments on a House of Lords debate covering measures to "ban pensions cold calling"
07 Dec 2018	Briefing	Parliamentary Briefing - the "ban on pensions cold calling"

14 Dec 2018	Briefing	Comments on a House of Commons debate covering measures to "ban pensions cold calling"
18 Dec 2018	Briefing	'Ineffective tweaks' to the regulations said to be intended to "rid society of the plague of nuisance calls"
18 Dec 2018	Briefing	The Campaign to End Nuisance Calls - our three demands
18 Dec 2018	News Release	Pressing on with our 'campaign to end nuisance calls'
24 Dec 2018	Consultation Response	Response to: ICO call for views on a direct marketing code of practice
04 Jan 2019	Briefing	Why the so-called "bans" on cold calling in respect of claims management and pensions are overhyped
18 Jan 2019	Open Message	Open Message in reply to blogging from Nicola Parish of the Pensions Regulator
21 Jan 2019	Briefing	Comment on a news story - "Firm boasts of swerving pension cold calling ban"

see also

Contributions to Radio Broadcasts

08 Jan 2018	BBC Radio West Midlands	Nuisance Calls - still the biggest annoyance
08 Jan 2018	BBC Radio Stoke	Stopping Nuisance Calls and dealing with those which remain
09 Jan 2018	BBC Hereford & Worcester	Nuisance Calls continue to be a problem
30 May 2018	LBC 93.7	NOT the end of Nuisance Calls
30 May 2018	BBC Hereford & Worcester	New data protection measures against Nuisance Calls
30 May 2018	BBC 5Live	New measures to attack Nuisance Calls
05 Jun 2018	BBC Hereford & Worcester	The End of the Landline - due to Nuisance Calls ?
14 Aug 2018	BBC Radio York	Pensions Cold Calling - ignore or decide?
21 Aug 2018	BBC Radio Wales	Dealing with Nuisance Calls
08 Sep 2018	BBC Radio 4 Today	New rules on Nuisance Calls
08 Sep 2018	BBC Radio Wales	New rules on Nuisance Calls
08 Sep 2018	LBC 93.7	New rules on Nuisance Calls
08 Sep 2018	BBC Radio 4 PM	Dealing with Nuisance Calls
25 Sep 2018	Talk Radio	Our campaign to end Nuisance Calls
17 Dec 2018	BBC Radio Wales	New rules enabling fining of Nuisance Call company directors
17 Dec 2018	BBC Radio Essex	New rules enabling fining of Nuisance Call company directors
09 Jan 2019	BBC Radio Essex	Nuisance calls and the so -called "pensions cold calling ban"

see also

Contributions to TV Broadcasts

30 May 2018	BBC TV Victoria Derbyshire
30 May 2018	Channel 5 News
08 Sep 2018	Sky News
08 Sep 2018	BBC News

see also

Newspaper coverage

06 Feb 2018	Legal Futures	Government accused of “breaking promise” on cold-calling ban
23 Apr 2018	Daily Telegraph	Why the Government’s proposed ‘ban’ on pensions cold-calling will change nothing
15 Aug 2018	FT Adviser	Pension cold calling ban branded inadequate
17 Aug 2018	Daily Telegraph	Major loopholes in the cold calling ban
30 Oct 2018	Professional Advisor	Pensions cold-calling ban a 'meaningless tweak' - campaign group
10 Nov 2018	Daily Telegraph	Government crackdown on PPI cold calls is not working
18 Nov 2018	Sunday Express	Cold-calling crackdown 'pathetic and toothless'
14 Dec 2018	FT Adviser	Cold calling ban approved by committee
09 Jan 2019	Daily Telegraph	Pension cold calls are illegal from today - "... the Fair Telecoms Campaign, warned of damaging loopholes in the ban"
17 Feb 2019	Mail on Sunday	Want to foil scammers who say your internet is about to be cut off? Don't press '1'

see also

The original messages

This briefing is primarily part of a dialogue which began with the messages published here.