

# **Primary Medical Services**

## **A consultation on General Practitioner Telephone Numbers**

**March 2015**

## **Ministerial Foreword**

**Shona Robison MSP, Cabinet Secretary for Health, Wellbeing and Sport**



### **General Practitioner Telephone Numbers – A consultation**

This Government's policy has always been to ensure that patients are not financially disadvantaged when contacting their GP practice.

The National Health Service (General Medical Services Contracts) (Scotland) Amendment Regulations (SSI 2005/337) and the National Health Service (Primary Medical Services Section 17C Agreements) (Scotland) Amendment Regulations (2005/226) amended legislation to ensure that "premium-rate" numbers couldn't be used by GP practices.

NHS bodies were allowed to continue using 084 numbers as these were classed as local calls by the regulator and would be as cheap when calling from a landline telephone as a geographical number.

In February 2011 Scottish Ministers issued guidance to the profession and in July 2013 restated guidance designed to curtail the use of 084 numbers as calls from mobile operators were being charged at rates akin to that of the aforementioned "premium-rate" numbers.

The principal purpose of this consultation is to ensure that the regulatory framework regarding the use of telephone numbers by GP practices remains fit for purpose.

I hope that you will take this opportunity to carefully consider these proposals.

I look forward to hearing your views on the issues and proposal discussed in this consultation.

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### Background

In July 2005 the Scottish Government introduced a ban on premium rate telephone numbers (0870 or 09). This however did not include 084 numbers, which are not classed as “premium rate” numbers. This Government’s policy is clear that no person should be financially disadvantaged while contacting their GP practice.

This policy was reiterated in February 2011 by the then Cabinet Secretary for Health and Wellbeing Nicola Sturgeon MSP in an open letter to the Chief Executives of each NHS Boards. This guidance stated that practices must not enter into, renew or extend a telephone contract unless they were satisfied that having regard to arrangements as a whole, persons would not be charged more to make the relevant calls than if they made the equivalent call to a geographic number, where they are not comparable to this all reasonable steps to rectify this must be taken.

As independent contractors, decisions on the type of telephone system used in their practices are generally the responsibility of the practice partners.

### 084 numbers

The 084 number range is not classified as premium rate by Ofcom, the communications regulator, instead they are generally classified as non-geographic numbers or as number translation services.

When the 084 numbers were introduced in GP practices the extra functionality that these systems provided allowed practices to improve telephone access to patients. This included call queuing which handled large call volumes, automated appointment booking and providing out of hours access to amend or cancel appointments. These days however telecommunications solutions are available to rent or purchase which operate with the same functionality but have a standard geographic number.

When a call to an 084 number reaches the telephone network, the number dialled by the caller is “translated” by the network to a geographic number to deliver the call to its destination. These “translation” costs are generally higher for 084 than for other number ranges. In addition the cost of originating calls from a mobile network is higher than that from a fixed line. Therefore the costs of allowing its customers to access 084 numbers is higher for mobile operators than it is for fixed operators. In a highly competitive market these call costs are ultimately paid for by the customers.

This is why charges to call 084 numbers can differ depending on the provider and whether the call is made from a fixed line or a mobile. Where mobile providers offer contracts with bundled call minutes, 084 numbers are often excluded from these packages. For those on Pay As You Go tariffs, calls to these numbers usually cost more than those made from a contract mobile account.

## **Mobile Telephones**

Current regulations prevent practices from using particular number ranges as their contact number, specifically numbers beginning with 087, 090, 091 (premium rate numbers) or 070 (personal numbers). However, the current regulations do not include any specific requirement for practices to consider the cost or type of calls being made to them. This has resulted in an unintended difference in treatment of people contacting a practice with an 084 number by mobile telephone in comparison to a caller on a landline. In terms of call tariffs, the call rates which patients are charged to call a 084 number will depend on their mobile phone service provider.

**General Questions**

1. The Scottish Government's policy is that no person should be financially disadvantaged when contacting their GP practice.

Do you agree with this statement?                      Yes      No  

Please tell us a reason for your answer in the box below.

2. The Scottish Government considers that, given the above statement, no person should have to pay more than the standard cost of a local call when contacting their GP practice.

Do you agree with this statement?                      Yes      No  

Please tell us a reason for your answer in the box below.

## Specific Proposals

### Proposal 1

Calls made to GP practices who have a telephone number beginning 084 can be very expensive if called from a mobile phone as, unlike geographical numbers (those beginning 01 and 02), these are not included in many call plans.

Given this, would you support an outright ban on 084 numbers? Yes  No

Please tell us a reason for your answer in the box below.

### Proposal 2

If a patient rings the GP Practice and the line is engaged or they are held in a queue, it can be frustrating and expensive for the patient. One option may be to have a “ring back” service, where the patient types in their phone number and once the line is available or they reach first in the queue they are called back by the practice.

Would you agree with the introduction of this service? Yes  No

Please tell us a reason for your answer in the box below.

### Proposal 3

One option may be to look into whether a call handling system could viably be introduced. This system, similar to that of the NHS 24 111 system, would see calls routed through a switchboard operator who would direct the call to the local practice.

Do you agree with this proposal? Yes  No

Please tell us a reason for your answer in the box below.

### Proposal 4

Each practice would obtain an 030 number, Ofcom introduced the 030 number range exclusively for public sector and not for profit bodies. 030 numbers offer the same extra functions as 084 numbers. All mobile operators have to charge 030 numbers in the same way as they would geographical numbers, ie included within a customer's bundle in their tariff. Although for the caller an 030 call is charged at the same as a local call, a charge is levied on the person or organisation receiving the call to cover the cost of the extra functions.

Would you agree with the introduction of these numbers? Yes  No

Please tell us a reason for your answer in the box below.



## Proposal 5

All GP practices would be required to use geographical numbers. There would be a grace period for each practice which had to change to enable current contracts to end without incurring unnecessary financial penalty to the practice

Do you agree with this proposal?

Yes  No

Please tell us a reason for your answer in the box below.

## Responding to this consultation paper

We are inviting written responses to this consultation paper. The consultation will start on 11 March and will run until 11 June 2015.

Please send your response with the completed Respondent Information Form to:

[Iain.Eddyshaw@scotland.gsi.gov.uk](mailto:Iain.Eddyshaw@scotland.gsi.gov.uk)

Or

Iain Eddyshaw  
Primary Medical Services  
Directorate for Health and Social Care Integration  
Area 1ER  
St Andrew's House  
1 Regent Road  
Edinburgh  
EH1 3DG

We would be grateful if you would use the consultation questionnaire provided as this will aid our analysis of the responses received.

This consultation, and all other Scottish Government consultation exercises, can be viewed online on the consultation web pages of the Scottish Government website at <http://www.scotland.gov.uk/consultations>.

The Scottish Government has an email alert system for consultations, <http://register.scotland.gov.uk>. This system allows stakeholder individuals and organisations to register and receive a weekly email containing details of all new consultations (including web links). It compliments, but in no way replaces SG distribution lists, and is designed to allow stakeholders to keep up to date with all SG consultation activity, and therefore be alerted at the earliest opportunity to those of most interest. We would encourage you to register.

## Handling your response

We need to know how you wish your response to be handled and, in particular, whether you are happy for your response to be made public. Please complete and return the Respondent Information Form enclosed with this consultation as this will ensure that we treat your response appropriately. If you ask for your response not to be published we will regard it as confidential, and will treat it accordingly.

All respondents should be aware that the Scottish Government are subject to the provisions of the Freedom of Information (Scotland) Act 2002 and would therefore have to consider any request made to it under the Act for information relating to responses made to this consultation exercise.

## Next steps in the process

Where respondents have given permission for their response to be made public and after we have checked that they contain no potentially defamatory material, responses will be made available to the public in the Scottish Government Library. (see the attached Respondent Information Form), these will be made available to the public in the Scottish Government Library by 25 July 2015. You can make arrangements to view responses by contacting the SG Library on 0131 244 4552. Responses can be copied and sent to you, but a charge may be made for this service.

**What happens next?**

Following the closing date, all responses will be analysed and considered along with any other available evidence to help us reach a decision on what changes are required. We aim to issue a report on this consultation process by mid July 2015 and make changes to regulations as soon as is practicable.

**Comments and complaints**

If you have any comments about how this consultation exercise has been conducted, please send them to the contact details mentioned above.



## Respondent Information Form

### A CONSULTATION ON GENERAL PRACTITIONER TELEPHONE NUMBERS

**Please Note** this form **must** be returned with your response to ensure that we handle your response appropriately

#### 1. Name/Organisation

Organisation Name

Title Mr  Ms  Mrs  Miss  Dr  Please tick as appropriate

Surname

Forename

#### 2. Postal Address

Postcode	Phone	Email

#### 3. Permissions - I am responding as...

Individual / Group/Organisation

Please tick as

**(a)** Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

**Please tick as appropriate**

Yes  No

**(b)** Where confidentiality is not requested, we will make your responses available to the public on the following basis

**(c)** The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

Are you content for your **response** to be made available?

**Please tick ONE of the following boxes**

**Please tick as appropriate**

Yes  No

Yes, make my response, name and address all available

**or**

Yes, make my response available, but not my name and address

**or**

Yes, make my response and name available, but not my address

**(d)** We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

**Please tick as appropriate**

Yes

## The Scottish Government Consultation Process

Consultation is an essential and important aspect of Scottish Government working methods. Given the wide-ranging areas of work of the Scottish Government, there are many varied types of consultation. However in general, Scottish Government consultation exercises aim to provide opportunities for all those who wish to express their opinions on a proposed area of work to do so in ways which will inform and enhance that work.

The Scottish Government encourages consultation that is thorough, effective and appropriate to the issue under consideration and the nature of the target audience. Consultation exercises take account of a wide range of factors, and no two exercises are likely to be the same.

Typically Scottish Government consultations involve a written paper inviting answers to specific questions or more general views about the material presented. Written papers are distributed to organisations and individuals with an interest in the issue, and they are also placed on the Scottish Government web site enabling a wider audience to access the paper and submit their responses<sup>1</sup>. Consultation exercises may also involve seeking views in a number of different ways, such as through public meetings, focus groups or questionnaire exercises. Copies of all the written responses received to a consultation exercise (except those where the individual or organisation requested confidentiality) are placed in the Scottish Government library at Saughton House, Edinburgh (K Spur, Saughton House, Broomhouse Drive, Edinburgh, EH11 3XD, telephone 0131 244 4565).

All Scottish Government consultation papers and related publications (eg, analysis of response reports) can be accessed at : Scottish Government consultations (<http://www.scotland.gov.uk/consultations>)

The views and suggestions detailed in consultation papers are analysed and used as part of the decision making process, along with a range of other available information and evidence. Depending on the nature of the consultation exercise the responses received may :

- Indicate the need for policy development or review
- Inform the development of a particular policy
- Help decisions to be made between alternative policy proposals
- Be used to finalise legislation before it is implemented

Final decisions on the issues under consideration will also take account of a range of other factors, including other available information and research evidence.

While details of particular circumstances described in a response to a consultation exercise may usefully inform the policy process, consultation exercises cannot address individual concerns and comments, which should be directed to the relevant public body.

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<sup>1</sup><http://www.scotland.gov.uk/consultations>

## **EQUALITY IMPACT AND BUSINESS REGULATORY IMPACT ASSESSMENT INFORMATION**

### **Equality Impact Assessment Information**

The public sector equality duties require the Scottish Government to pay “due regard” to the need to:

- Eliminate discrimination, victimisation, harassment or other unlawful conduct that is prohibited under the Equality Act 2010;
- Advance equality of opportunity between people who share a protected characteristic and those who do not;
- Foster good relations between people who share a relevant protected characteristic.

These three requirements apply across the “protected characteristics” of age; disability; gender reassignment; pregnancy and maternity; race; religion and belief; sex and sexual orientation.

In effect, this means that equality considerations are integrated into all functions and policies of Scottish Government Directorates and Agencies.

A Key part of these duties is to assess the impact of all of our policies to ensure that the Scottish Government do not inadvertently create a negative impact for equality groups, and also to ensure that the Scottish Government actively seek the opportunity to promote equality of opportunity and to foster good relations.

The Scottish Government has not identified any potential negative impact on any equality group of the proposals in this consultation exercise. Indeed, in so far as these proposals are intended to safeguard the provision of local NHS services, it considers that the proposals are supportive of the interest of all equality groups in the same way as they are supportive of the care needs of the wider population.

The Scottish Government welcomes your feedback regarding the equalities impact of the proposals presented in this paper, and the effect they may have on different sectors of the population.

### **Business Regulatory Impact Assessment Information**

The Scottish Government is committed to consulting with all parties potentially affected by proposals for new legislation, or where any regulation is being changed significantly. All policy changes, whether European or domestic, which may have an impact upon business or the third sector organisations should be accompanied by a Business Regulatory Impact Assessment (BRIA).

The BRIA helps policy makers to use available evidence to find proposals that best achieve the policy objectives, whilst minimising costs and burdens. Through consultation and engagement with business, the costs and benefits of the proposed

legislation can be analysed. It also ensures that any impact on business, particularly small enterprises, is fully considered before Regulations are made.

The Scottish Government welcomes your views regarding the impact that the proposal presented in this paper may have on businesses.

The Scottish Government has identified potential impact on 2 business interests in this consultation.

1. In respect of independent GP practices, these proposals will benefit patients as they will no longer be disadvantaged when calling their GP practice, however the practice itself may lose any revenue sharing agreement that they may have with their telephone provider.

2. In terms of the wider NHS family, this may have an impact on other sectors of the care sector who may still actively use 084 numbers.



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National Appeal Panel Chair  
Scottish Healthcare Service Centre  
Scottish Health Council  
Equality and Human Rights Commission  
Scottish Patients Association  
Alliance Scotland  
Voluntary Health Scotland

NHS Boards have been asked to circulate the consultation link to :-

- Area Medical Committees
- Any other groups with an interest
- Their contracted GPs



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