



Customer Care & Refund Policy

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1. Introduction

The Number UK Ltd (TNUK) operates a directory enquiries (DQ) service to all mobile and fixed line callers in the UK. It is most well-known for its DQ service on 118118 but does operate other retail and wholesale DQ services too. For the purposes of this document, references to 'us', 'our', 'we' and 'agent' includes directors and senior management of The Number UK Ltd and also includes agents where any of the functions in this policy are outsourced or managed by third parties. 118118 has been in existence since the UK directory enquiries market deregulated in 2002.

2. Purpose

The purpose of this document is to outline the Refund policy for 118118 as well as the other 118 numbers owned by TNUK.

3. Scope

This policy is relevant to any person who contacts 118118, or its other numbers requesting a refund or raising a complaint which results in a refund.

4. Objective

118118 is a premium rate service at a premium price so it is important to us that we have the appropriate measures in place to ensure that customers are protected as much as possible from high call charges and bill shock. Our preventative measures include:

- A voluntary call cap which terminates calls at approx. £40 of service charges to avoid higher bills for customers.
- Being fully compliant with Ofcom's directory enquiries price cap which was introduced in 2019 to reduce bill shock. This prevents a call from being charged more than £3.65 per 90 seconds.
- Having an automated pricing announcement prior to call completion which informs the customer of the ongoing per minute charge. This is automated to ensure it is played on every call where onward call connection is chosen.

However, we understand there are instances where a call to 118118 may, due to particular circumstances, lead to a higher charge or series of charges, despite the preventative measures.

For this reason, our objective is to have a robust refund policy that looks to refund customers fairly in situations where help is required and evidence demonstrates a refund is valid. .

5. Complaint Scenarios

There are numerous reasons why a refund may be requested. Specific scenarios where refunds will be considered are:

1. **Large bill complaint, with no extenuating circumstances** (this includes bill shock). Refunds of this nature are handled with discretion with greatest sympathy shown to customers with very large bills. A fine balance is required to ensure that the customer is refunded appropriately but our service charges are covered for legitimate calls where the service has been provided correctly.

2. **Poor service given** – For refunds of this nature, evidence will be gathered to justify the refund is appropriate. If we have failed to offer a good service, then we, will bear the cost. Information will be gathered from call recordings (where possible) and agent feedback to assess the complaint, and appropriate action is taken within the call centre to ensure poor service is prevented in the future.
3. **Technical issue** – This relates to failure to deliver part of the service due to a technical problem such as the call not reaching the call centre or the text containing a partial number. Refunds of this nature can be difficult to diagnose especially if calling from a mobile, as mobile phone signal can often play a part in the delivery of a call. However, complaints of this nature will be investigated and refunded where it is proven that there was a technical issue.
4. **Complaints resulting from callers which demonstrate vulnerable needs** - Calls of this nature are incredibly important and are covered in section 6 below, and we have a separate policy that details how we identify and help vulnerable customers
5. **Sensitive calls** – specifically forwarded calls to NHS Direct, Samaritans, Car Breakdown (AA/RAC/Green Flag Roadside Breakdown), Citizens Advice Bureau, Debt helplines, government helplines or other emergency helplines. These calls can be longer than calls for other types of numbers, and the objective is not to profiteer from long-call revenue resulting from hardship or distress.
6. **Unauthorised or unusual usage** – this is a variant of scenario 1 but where the customer can demonstrate that a 3rd party, for example, a child, has made an unusual number of calls in a short period and / or call connected to unusual numbers.

Scenarios 4, 5 and 6 all fall within the definition of vulnerable calls.

6. Vulnerable Callers

The UK premium rate regulator, Phone-paid Services Authority (PSA), defines a Vulnerable Caller as:

“A consumer who is less likely to make fully informed, rational decisions due to a specific characteristic or personal circumstance, and can suffer detriment as a result.”¹

The PSA’s General Guidance document on Vulnerability states that customers can be vulnerable due to:

- 1) Characteristics, including (but are not limited to):
 - Lack of English language or literacy skills
 - Disability
 - Age – children (defined as under 16 years of age)
 - Elderly (usually defined as over 65 years of age)
 - Learning difficulties
 - Long term financial hardship
 - Mental illness
- 2) Circumstance:
 - A temporary or unexpected change in circumstance that might cause distress and result in a situation of vulnerability. These are generally considered significant life events that can effect anyone and are often unexpected and can be more short / medium term in nature. For example, (again not limited to):
 - Bereavement
 - Job loss or other loss of income or livelihood

¹ <https://psauthority.org.uk/for-business/-/media/8CFC46C804C048798524B03B1A2A3125.ashx>

- Victim of a natural disaster (e.g. flood)
- Sudden and unexpected situation causing strife (e.g. collapse of a financial institution, illness or relationship breakdown)

Our experience indicates that vulnerable customers reach out to 118118 in times of need and evidence shows that we can identify some vulnerable callers by their calling patterns and unusual requests. We endeavour to show compassion and be sympathetic with refunds of this nature to avoid causing hardship for vulnerable customers.

In all scenarios where the customer can be identified as vulnerable, a full refund can be given where enough information is collated to verify the refund is valid.

In addition to our Customer Care Policy, we have a Vulnerable Customers Policy which provides further detail about our processes and procedures for helping customers of this nature.

7. The Refund Process

To evaluate a refund request, the following steps will be undertaken by the Customer Care team:

1. Information collation

Depending on the type of refund request, our Customer Care team may ask for some / all of the information listed below from the person requesting the refund. The level of information required depends on the value and the reason for the refund. For example, a refund for a wrong number would only require the call details to be collected. A refund involving a vulnerable customer will require additional information to validate the situation.

Information Required	Details	Purpose
Call Details	Date / time / number dialled / number requested.	Having all of this information helps our Customer Care team to establish the facts of the complaint.
Customer Phone Bill	A photo / emailed copy of the phone bill displaying the bill payer's name & address and details of the calls	In addition to verifying the call details, a phone bill is usually used to validate the recipient of the refund and to ensure any cheques are sent to the correct person.
Details of mitigating circumstances	For example, illness or bereavement	Information to support mitigating circumstances helps the refund decision making process
Medical Information	For example, a letter from a Doctor	This information is required to support the refund request. Further information regarding medical information can be found below.
Power of Attorney	For example, a copy of a document which demonstrates that the person requesting the refund is authorised on behalf of the customer.	This is required when a person is acting on behalf of the bill payer and the bill payer is unable to liaise directly with us for the refund. See below.

1a. Medical documentation

If we need to obtain medical information, for example, a doctor's letter, we will ask for the explicit consent of the customer in line with the requirements surrounding 'special categories of personal information' within GDPR. Our Privacy Policy contains further details.

<http://thefnumber118118.co.uk/wp-content/uploads/2021/11/118118-Privacy-Policy.pdf>

1b. Power of attorney

If the person requesting the refund is doing so on behalf of the bill payer, then we need to obtain consent from the bill payer that we can interact with the person requesting the refund on their behalf. Where this is not possible, we will need to see evidence of power of attorney to support the claim.

2. Investigation

Whilst the above information is being collated, our Customer Care team will obtain internal data as follows:

Information	Details	Purpose
Call Details	Date / time / number dialled / number requested.	To establish the facts of the complaint.
Call Recordings	Calls between agents and customers are recorded for quality and training purposes and capture the number requested by the customer.	Call recordings provide valuable insight into the call experience and can help to validate a refund request

3. Refund approval

Once all facts are gathered, a decision will be reached on the % of refund to award.

- Refunds under £10 can be approved quickly.
- Refunds over £10 require additional approval which can take longer but we aim to complete all refunds within the timelines stated below. Where this is not possible due to unforeseen circumstances, customers are kept fully informed of the process and next steps to avoid any confusion or worry. Please see section 10 for timelines.

4. Customer Contact

The person who requested the refund will be contacted by phone or email as soon as possible after a decision is made on the value of the refund.

If the person is happy with the refund, the refund will be actioned and provided to the bill payer.

If the person objects to the refund offer with valid reasons, then the case can be evaluated again. This does not guarantee that a higher refund will be rewarded but the details will be revisited to ensure that the proposed refund is fair.

8. Refund Methods

We recognise that it is important for customers to have a choice of refund methods because what works for one customer may not be suitable for another. For this reason, we offer two refund methods.

- **Cheque refund** – Written in the name of the bill payer for the agreed refund value.
- **Post Office Refunds** – This involves texting a refund collection code to the bill payer, who can then exchange the code at a Post Office counter for a cash refund.

9. Refund Composition

Any refunds authorised by TNUK are based on the service charge paid for the call. We do not reimburse access charges which are charged by the telephone company responsible for the phone/handset that made the calls. Customers need to contact their telephone company directly for any refunds relating to access charges. Information about service charges for our 118 numbers and how service charges and access charges work, can be found on our website at <http://www.thenumber118118.co.uk/about/#Cost>. Our website also provide links to the pricing pages of the most popular landline and mobile networks too.

10. Timelines

In line with PSA's 15th Code of Practice, we endeavour to complete resolve a complaint and / or a refund request within 30 working days from the initial contact being made with our Customer Care Team.

We will acknowledge receipt of a complaint or refund request within 5 working days.

Once a refund has been agreed, it will be processed within 14 working days.

11. No Refund Scenarios

It is important to remember that a charge for 118118 relates to the search facility, and not a number being provided. Therefore, a call which results in no number found does not automatically qualify for a refund unless there are other mitigating factors to assess.

Our agents are trained to handle all calls sensitively and on occasions, customers may choose to call for reasons which do not relate to directory enquiries. Calls of this nature do not warrant a refund unless mitigating factors can be proved.

12. Contact Information

Our Customer Care Team is available Monday to Friday between 9am to 5pm on the free-phone number listed below. Calls to this number at any other time will be answered by a member of the call centre who will pass on the details to the Customer Care team for response.

- **Telephone: 0800 3891 118**

Alternatively, customers can email their requests to the email address below. Upon receipt, an auto generated email will be sent back to the sender and the request will be passed to a member of the Customer Care team for investigation.

- **Email: customer.care@118118.com**

Should a customer call 118118 directly for a refund, then the agent will collect the details of the request and send on to the Customer Care team. Whilst our 118118 agents are happy to take the details of any refund request directly on a 118118 call, we recommend that customers contact the Customer Care team directly on the free phone number. However, we do refund the service charge of the call made to request a refund should a customer choose to contact 118118 directly with their refund request.

13. VeriCall Ltd

Complaint and / or refund requests directed to the Customer Care team will be dealt by VeriCall Ltd who are a sub-contractor, appointed by TNUK, for call handling and customer care related to our 118 services. As VeriCall manage our Customer Care team, they will be the first point of call for any complaints or refund requests about our 118 numbers but they will involve TNUK should the refund request require further assistance, or if they require additional approval if the value is over £10.

All data provided to VeriCall, and exchanged with TNUK where necessary, is protected by appropriate technical security measures and retained in accordance with PSA requirements. Our Privacy Policy covering data retention and storage can be found at <http://thenumber118118.co.uk/wp-content/uploads/2021/11/118118-Privacy-Policy.pdf>.

VeriCall Limited is a company incorporated in England and Wales (Registered No. 10921629) with its registered office at Cotswold House, 219 Marsh Wall, London, E14 9FJ. VeriCall's Privacy Policy can be found at <https://vericallsolutions.com/index.php/privacy-policy/>

14. PSA Contact Details

Should a customer be dissatisfied with the Customer Care they have received from TNUK or with the handling of their enquiry or complaint, they can contact the Phone-paid Services Authority (PSA) directly using the following details:

- <https://psauthority.org.uk/for-consumers/contact-us-for-consumers>
- Phone: 0300 30 300 20*

**calls to 03 numbers should cost no more than geographic 01 or 02 calls and may be part of inclusive minutes subject to your provider and your call package.*

PSA's call centre is open Monday to Friday between 09:30 and 12:30. Outside of these hours, they recommend reporting the issue online using the above link.

15. Document History

Version	Date	Author / Updated By	Remarks / Change Details	Approval date
1	23.02.22	Emma Knight		24.02.22
2	15.03.22	Emma Knight	Updated 7.1b as a result of revised POA + consent letter.	24.03.22 – Cor Falcon