



## 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 operates 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 Customer Care handling and 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 118 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. Customer Care Team

Complaint and / or refund requests directed to the Customer Care team will be dealt by Telecom 2 Ltd who are appointed by TNUK, for call handling and customer care related to our 118 services. As Telecom 2 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 additional approval.

All data provided to Telecom 2, and exchanged with TNUK where necessary, is protected by appropriate technical security measures and retained in accordance with Ofcom requirements. Our Privacy Policy covering

data retention and storage can be found at <https://www.thenumber118118.co.uk/documents/Privacy-Policy.pdf>.

Telecom 2 Limited is a company incorporated in England and Wales (Registered No. 6926334) with its registered office at Cotswold House, 219 Marsh Wall, London, E14 9FJ. Telecom 2's Privacy Policy can be found at [https://telecom2.net/wp-content/uploads/2020/12/privacy\\_statement.pdf](https://telecom2.net/wp-content/uploads/2020/12/privacy_statement.pdf)

## 6. Customer Care Contact Details

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 voicemail and a member of the team will respond during opening hours.

- **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 informing them that the request will be passed to a member of the Customer Care team and they will be in touch within 5 working days. The Customer Care team will then contact the sender within that timeframe.

- **Email: [customer.care@118118.com](mailto:customer.care@118118.com)**

Should a customer call 118118 directly for a refund, then the agent will advise the customer to contact the Customer Care team directly on the freephone number listed above.

Once the Customer Care team has been contacted directly, the customer should inform the Customer Care team that they obtained the phone number via 118118 so that they can be reimbursed for the service charge incurred on the call made to 118118 to obtain the Customer Care phone number.

## 7. 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 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. 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.

5. **Sensitive calls** – Specifically forwarded calls to government or 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 3<sup>rd</sup> 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.

## 8. Vulnerable Callers

Ofcom, who are responsible for the regulation of Premium Rate Services, define “Vulnerable Consumers” within their PRS Order as follows:

“vulnerable consumers” means consumers having—

- (a) the capacity to make decisions about a controlled PRS but who because of a specific characteristic, circumstance or need, may require assistance to do so, or
- (b) limited capacity to make such decisions because of a specific characteristic, circumstance or need, and require assistance to do so,

in a way a PRS provider could reasonably be expected to foresee;

“decisions about controlled PRS” include decisions about whether, how and on what terms to purchase a controlled PRS, make a payment for a controlled PRS or exercise a contractual right in relation to a controlled PRS;

“specific characteristic, circumstance or need” includes, in particular, age, illness, physical or mental impairment which has an adverse effect on the carrying out of normal day-to-day activities, or emotional distress.

(PRS = premium rate service)

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 may 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 to ensure we do our best for customers who may require additional assistance from us.

## 9. 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 call details to be collected. A refund involving a vulnerable customer will require additional information to validate the situation.

Information Required	Details	Purpose
<b>Call Details</b>	Date / time / number dialled / number requested.	Having all of this information helps our Customer Care team to establish the facts of the complaint.
<b>Customer Phone Bill</b>	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 helps us prevent against instances of fraud, and to ensure any cheques are sent to the correct person.
<b>Details of mitigating circumstances</b>	For example, illness or bereavement	Information to support mitigating circumstances helps the refund decision making process
<b>Medical Information</b>	For example, a letter from a Doctor	This information may be required to validate the mitigating circumstances. Further information regarding medical information can be found below.
<b>Power of Attorney</b>	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.

#### 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. <https://www.thenumber118118.co.uk/documents/Privacy-Policy.pdf>

#### 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.

#### Bereavement

If the person requesting the refund is doing so as the bill payer is deceased, then we require additional documentation to ensure that the correct person receives the refund on behalf of the deceased. A letter of representation or probate from the person responsible for dealing with the deceased's estate is required as well as a copy of the death certificate. A copy of the deceased's phone bill is also necessary to verify call details. Refunds in these circumstances cannot be awarded without this information.

## 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. Section 10 covers 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 regarding their query.

If a refund is granted and the person is satisfied with the refund offer, 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 awarded but the details will be revisited to ensure that the proposed outcome is fair.

In situations where it may take longer to reach a decision, the person requesting the refund will be kept informed of the status.

## 10. Refund Methods

Customers have a choice of refund methods because what works for one customer may not be suitable for another. For this reason, we have two refund methods.

- **Cheque refund** – Written in the name of the bill payer for the agreed refund value.
- **Bank transfer** – Depositing the agreed refund value straight into the bill payer's bank account.

Where a bank transfer is the preferred refund method, the bill payer will need to supply their bank including account name, account number, sort code and name of banking institution in order for the transfer to be actioned.

TNUK is responsible for Customer Care but we use a sub-contractor, Telecom 2 Ltd, for call handling and customer care related to our 118 services. Telecom 2 Ltd will collate the required details for cheque refunds and BAC transfers. Bank details will be deleted from our files once the bank transfer has been processed. Please see our privacy policy for further details. <https://www.thenumber118118.co.uk/documents/Privacy-Policy.pdf>

## 11. 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 <https://www.thenumber118118.co.uk/about/index.html#Cost>. Our website also provide links to the pricing pages of the most popular landline and mobile networks too.

## 12. Timelines

In line with Ofcom's PRS Order, we endeavour to resolve a complaint and / or a refund request as soon as possible 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.

We will keep you updated on the status and progress of your complaint whilst it is under review.

Once your complaint has been reviewed and a decision reached, we will communicate to you:

- a) The decision reached
- b) The reason for that decision
- c) The amount of any refund awarded
- d) The timeline for issuing the refund to you if that is by cheque, or a date or payment, if the refund is by BACS transfer

## 13. No Refund Scenarios

It is important to remember that a charge for 118118, or any of our other 118 numbers, 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.

## 14. Re-issuing of misplaced / lost cheques

Should the bill payer misplace their cheque, a new cheque can be re-issued providing it can be identified that the original cheque has not been cashed. Original cheque details will be required for us to ascertain the cheque's status.

Cheques older than 4 years from the date of issue to the date of the re-issue request will be refunded at 50% of their original value.

Cheques younger than 4 years from the date of issue to the date of the re-issue request will be refunded at 100% of their original value.

## 15. Ofcom Contact Details

Should a customer be dissatisfied with the Customer Care they have received from TNUK or with the handling or resolution of their enquiry or complaint, they can contact Ofcom directly.

Their website offers a variety of ways to get in touch with Ofcom:

- By phone:
  - 0300 123 3333 – calls cost no more than calls to geographic numbers (01 or 02) and must be included in inclusive minutes and discount schemes in the same way.
  - 020 7981 3040 – calls from landlines are typically charged up to 9p per minute; calls from mobiles typically cost between 3p and 55p per minute.
- By post:
  - Address: PO Box 1285, Warrington, WA1 9GL

Please visit their website for further details: <https://www.ofcom.org.uk/make-a-complaint/>

## 16. Contact Details for The Number UK Ltd

The Number UK Ltd is a company incorporated in England and Wales (Registered No. 04352737)

### Head Office

Address:  
5th Floor  
1 Capital Quarter  
Tyndall Street  
Cardiff  
Wales  
CF10 4BZ

Telephone: [029 2054 8000](tel:02920548000)

Website: [www.thenumber118118.co.uk](http://www.thenumber118118.co.uk)

## 17. Ofcom's 7 requirements for Customer Care

Ofcom stipulates that the Customer Care policies of premium rate service providers must describe the means and methods for establishing compliance with the seven requirements set out in article 37 of the PRS Order.

The following table summarises core elements of our Customer Care policy and demonstrates how we meet the requirements set by Ofcom.

P37	7 Requirements	Requirement satisfied?	Policy Location
1	A consumer must be able to make any enquiry or complaint— (a) free of charge, or (b) where it is made using a	Customers can contact Customer Care via a free phone number 0800 3891 118 or via email. <a href="mailto:Customer.care@118118.com">Customer.care@118118.com</a>	Section 6: Customer Care Contact Details

	telephone number for contacting the merchant, at no more than the basic rate.		
2	The merchant must use its best endeavours to ensure that all calls received from consumers are answered between 9 am to 5 pm on working days for the purposes of dealing with any enquiries and complaints.	The Customer Care Team is available Monday to Friday between 9am to 5pm on the free-phone number. Calls to this number at any other time will be answered by voicemail and a member of the team will respond during opening hours.	Section 6: Customer Care Contact Details
3	All enquiries and complaints made by means other than a call should be acknowledged to the consumer within five working days beginning with the day on which the enquiry or complaint is received.	Upon receipt of an email, an auto generated email is sent to the sender informing them that a member of the team will be in touch within 5 working days. A member of the Customer Care team then follows up with the sender within that timeframe.	Section 6: Customer Care Contact Details Section 12: Timelines
4	The merchant must inform the consumer, at appropriate intervals, about the status and progress of the enquiry or complaint.	The Customer Care Team will keep the customer updated via phone or email regarding the status of their enquiry or complaint.	Section 12: Timelines
5	The merchant must use its best endeavours to resolve issues raised by consumer's enquiry or complaint.	The Customer Care team have a set process for investigating and resolving complaints as detailed in the policy	Section 9: The Refund Process, Section 10: Refund Methods, Section 11: Refund Composition
6	The merchant's determination of any enquiry or complaint must be provided to the consumer without undue delay.	Customers are notified as soon as possible after a decision is reached. Customers will be informed of a) the reasons for that decision, b) the amount of any refund, and c) the approximate date on which any refund will be paid to the consumer	Section 12: Timelines
7	The merchant must make and keep appropriate records in writing of enquiries and complaints and any determination made in respect of them.	Enquiries are logged and details kept in line with relevant retention periods. All data is protected by appropriate security measures	Section 5: Customer Care Contact Details

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## 18. Document History

Version	Date	Author / Updated By	Remarks / Change Details	Approval date
1	23.02.22	EK		24.02.22
2	15.03.22	EK	Updated 7.1b as a result of revised POA + consent letter.	24.03.22 – CF
3	16.11.22	EK	Updated 8 – Change in refund method	17.11.22 – CF
4	16.11.22	EK	Updated 8 – Refund method details	01.12.22 - CF
5	28.02.23	EK	Updated Privacy Policy Link	28.02.23 EK
6	26.04.23	EK	Updated Privacy Policy Link	26.04.23 EK
7	14.06.23	EK	Updated section 7	15.06.23 CF
8	20.06.23	EK	Section 12 update	22.06.23 TF
9	26.07.23	EK	Updated PSA link	26.07.23 EK
10	15.08.23	EK	Updated Privacy Policy Link	15.08.23 EK
11	27.11.24	EK	Updated in preparation for Ofcom’s PRS Order 01.02.25	21.01.25 IK
12	07.05.25	EK	Updated sections 5 and 6	08.05.25