OTS Best Practice Guide for Switching where a telecare alarm is present Version.1.4

October 2024

What is the issue?

- As of September 2024, there are approximately 1.3m residential users of telecare alarms, the majority of which are still analogue. These require a voice path for the DTMF signalling, which can be adversely affected by a move to VoIP
- The issue is a simple one. If the Losing Retail CP (LRCP) customer has a telecare alarm, following the switch to the Gaining Retail CP (GRCP) service, the vulnerable customer should have an alarm that is known to be functioning prior to any use in an emergency.
- Under OTS, once the GRCP has confirmed their provision activity is complete, they will trigger the cessation of the customer's existing service(s) provided by the LRCP, if the service(s) have not already been ceased by other activities of the switching process. For telecare alarms the risk is that the life-line service fails either because it has not been physically migrated to the new service, has no working VoIP service or the alarm is incompatible with VoIP, or the alarm is incompatible with some other element of the new service

What are we seeking to achieve?

- A minimum set of best practice guidelines associated with OTS covering how the GRCP needs to identify and support vulnerable customers with telecare alarms covering:
  - Sales process (Gaining and Losing)
  - Pre-installation
  - Installation
  - Post Installation and prior to the GRCP triggering cessation

  All associated with the switching of IAS – Internet Access Service* and/or NBICS – Number Based Interpersonal Communications Service**

**IAS = 'Broadband'*
***NBICS = 'Voice, Digital Voice, VoIP, Telephony'*

Issues for the CPs – No common process

- Provision of Digital services will **not** adopt a uniform approach:
  - A customer may seek to order broadband only
  - An engineer might install both the Broadband and Digital Voice
  - An engineer may install the broadband line, but the CP might post the digital voice equipment for customer self-install
  - An engineer might install the broadband line, but the customer may order the voice service via a third-party
  - The network operator may remain the same but with a change of CP, so there would be no engineering visit
  - The new network operator may have an existing (stopped) connection that can be restarted without an engineering visit

Issues for the CPs – OTS and telecare alarms

- Under OTS coordination must be handled by the GRCP
- Under OTS, once the GRCP has confirmed their provision activity is complete, they will trigger the cessation of the customer's existing service(s) provided by the LRCP, if the service(s) have not already been ceased by other activities of the switching process. For telecare alarms, the risk is that the life-line service fails either because it has not been physically migrated to the new service, has no working VoIP service or the alarm is incompatible with VoIP, or the alarm is incompatible with some other element of the new service

Sales activity

- It should be noted that while this best practice is specific to supporting OTS, the approach taken by a CP to identify vulnerable users/telecare users and their needs, should be consistent across all provisioning approaches
- At the point of sale, the GRCP must check with the user whether they have a telecare alarm and if so whether it is connected to their telephone socket, extension wiring or plugged into their router.
  - Some telecare alarms are already digital using GSM Mobile so are not connected to the PSTN and not affected by any migration/switch
  - *Note: Customers may not recognise the term “telecare alarm” and be more aware of phrases such as 'personal alarm' or 'pull-cord alarm' or 'pendant alarm'*
- If the customer has a connected alarm but does not wish to retain a voice service, the customer should be advised to ask their telecare alarm provider to replace their existing device with one that is fully digital before proceeding to place their broadband order. If they wish to proceed their express consent to this needs to be recorded

Sales activity

- Similarly, if the CP can only provide a broadband service, the customer should be advised to ask their telecare alarm provider to replace their existing device with one that is fully digital before proceeding to place their broadband order. If they wish to proceed their express consent to this needs to be recorded

- If a connected alarm is present and the CP can offer both broadband and digital voice, the customer should be informed that there is the risk that their alarm might prove incompatible with a digital line and that if this arises, the matter will need to be resolved by the telecare alarm provider, which will mean they will be without an alarm service until the problem is resolved. Their express consent to this needs to be recorded

- If the customer does not give consent , the order must not progress. The customer should be advised to request a digital telecare alarm from their telecare service provider before seeking to re-order

Matching – LRCP response and GRCP action

This is critical step to alert the GRCP that voice service may be present, upon which a telecare alarm might be dependent, especially if the customer has not previously indicated they had a voice service.

- As per the OTS Process* section: **6.7 - Information in match response on services to be ceased, or where the customer has a choice to cease or retain**

  "The LRCP must additionally include a response for any voice or broadband that was not included in the match request, was found by the LRCP, and has a potential impact for the customer"

  Additionally, the LRCP must inform the GRCP if there would be a '**ForcedCease**' of service:

  "The LRCP has found this service as an additional service (i.e. it was not included in the match request) and the service must be ceased if the customer proceeds with a switch of the other service. "

If the LRCP indicates the presence of a '**ForcedCease**' of voice, and the GRCP is aware of a telecare alarm being present, they are advised to re-confirm with the customer their requirements relating to the continuation of their telecare service.

* Process Technical Documents - TOTSCo

LRCP – Switch Implications

In addition to complying with General Conditions* C1.8, C7.12 and C7.25:

- If the LRCP is aware or suspects that a customer may have a telecare device connected to their service, this should be reflected in the SI information sent to the customer when an OTS successful match is achieved

  Suggested text *" Our records show that you may have had some form of personal alarm or safety pendant connected to your existing telephone line. If this is still required, you are advised to alert your new CP so that they can ensure it will work on your new service"*

- If the LRCP has no indications a customer has a telecare device, then they should, as part of the SI, include an appropriate message to inform the customer that if telecare is present, the customer should inform their new CP of this to allow the new CP to provide an appropriate solution, should they still require that telecare service.

  Suggested text *" If you have some form of personal alarm or safety pendant connected to your existing telephone line, you are advised to alert your new CP so that they can ensure it will work on your new service"*

* General Conditions of Entitlement - Ofcom

Pre-Installation activity

- The GRCP places the order with their Network Operator for the broadband line and any other services being installed by the network engineer attending site. Where appropriate, the GRCP posts any voice equipment to the end customer for self-install

- Ideally, the engineer attending site should be informed of the presence of the telecare alarm, which allows:
  - The engineer to check the status of the individual prior to removing any copper drop wire as the existing service may not be easily reinstated in the event of an alarm compatibility issue
  - The engineer/Network Operator can flag back to the GRCP where an unexpected connected telecare device is identified to enable the GRCP to comply with Ofcom's expectations in relation to vulnerable customers, as set out in Ofcom's rules (*General Conditions of Entitlement*) and Ofcom's "*Guide for providers on treating vulnerable customers fairly*"

Installation

- Installation appointments where a telecare alarm is known to be present are recommended to be scheduled for working week-day mornings (excluding public holidays), as this allows for more time to resolve any alarm issues
- If the engineer identifies an unexpected telecare device that is connected to the existing broadband/voice service, this may indicate that the appropriate express consent to the risks has not been obtained. In such circumstances the installation should not proceed, the issue flagged to the GCP to follow up with the customer and the customer informed of this
- If the copper drop wire has been removed to allow for the installation of fibre, the installation should continue but the GRCP needs to be advised of the situation so that they can contact the customer to undertake their post installation validation

Post-Installation

- Following installation, the Gaining CP should confirm that
  - The broadband is operating correctly
  - Any new digital voice service is working
  - Check or prompt the customer regarding alarm reconnection and that the customer has tested the alarm can communicate with the Alarm Receiving Centre (ARC) . If the alarm cannot contact to the ARC, the GRCP should ask or prompt the user to report the fault to the ARC
  - A network operator's engineer might undertake all these tasks on behalf of the GRCP. Where the voice elements are self-installed, the GRCP will need to establish a mechanism to confirm or prompt that the voice service installation and successful/unsuccessful alarm transfer have taken place
- OTS notice of completion ('Trigger Request') should not be sent by the GRCP until until after the above activity is completed
- The LRCP will cease service on receipt of the 'Trigger Request' . If the telecare alarm is not working, the GRCP should have made the customer aware that this needs to be resolved by them with their Alarm Receiving Centre.

Feedback and Comments

Any feedback or comments relating to this document should be addressed to:

info@offta.org.uk

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