

How to use "Enhanced Telephony" as a NHS GP

Many NHS GPs wish to benefit from "Enhanced Telephony" to provide "a better telephone system for their patients".

Daisy Group has factual evidence to show that when this is used:

- Patients find it twice as easy to get through on the phone
- Patients find more than twice as easy to speak to a doctor on the phone
- Patients find it 3 times as easy to get test results on the phone

"Enhanced Telephony" uses facilities deployed at the telephone exchange, rather than through expensive equipment deployed at the surgery. These are however only available on **non-geographic telephone numbers**.

The NHS GP contracts

The NHS GP contracts require practices "*to ensure that, having regard to the arrangement as a whole, persons will not pay more to make relevant calls than they would to make equivalent calls to a geographical number*".

When selecting a non-geographic number, NHS practices should note these factual statements from OFCOM:

"Only 03 is charged precisely the same as 01 and 02 (geographic) numbers by all telephone companies."

"Aside from BT, fixed and mobile telephone companies are able to set their own charges for 0845/44/43 numbers and have no requirement to align these charges to the rates used for 01/02/03 numbers."

"084 numbers are frequently charged at a higher rate than a 01, 02 or 03 number."

To be assured of compliance with their NHS contract they must therefore use a 03 number. If considering a 084 number, they would need to research all of the charges incurred by those who call them to ensure that "as a whole" they were not at a higher rate.

Existing arrangements

Prior to the introduction of the contractual requirements regarding the relative cost of calling, many GPs made arrangements to use "Enhanced Telephony" on 084 numbers. This may have been in the mistaken belief that these numbers "*offer patients a guaranteed low call rate*". **There never has been any such guarantee** - the Ofcom reference to there being no general regulation of charges has always been true. Since 2004, there has been no requirement on BT to align charges to the rates charged for geographic calls.

To address this situation the GP contracts required that "before 1st April 2011", practices in this position must vary the terms of their arrangements for telephone service to comply with the requirement stated above. Only such steps as are reasonable need be taken.

For those committed to the use of "enhanced telephony" for the benefit of their patients, the obvious variation required is to migrate to a 03 number. Such migration is supported by regulation and Standard Industry Practice enables it to be undertaken on reasonable terms.

Migration from 084 to 03

Ofcom regulation ensures that the 034 equivalent to every 084 number is reserved for the user of that number and their current telephone service provider. The opportunity to migrate (e.g. from 0844 477 1799 to 0344 477 1799) is therefore assured.

It is standard practice in the telecommunications industry to allow such migration **at any point during the term of a telephone service arrangement without penalty**. Compliance with this standard practice is confirmed by Talk Talk, shown as being the provider of network telephone service to the vast majority of NHS GPs using "enhanced telephony".

The BMA alleges that many GPs are prevented from migrating as a result of non-standard terms applied by their telephone service providers:

"many GP practices have signed multi-year contracts with telephone services providers which cannot be varied, renegotiated or terminated without substantial financial penalty".

If there are providers who deviate from the standard industry practice, it is important that the facts be known and their identity declared.

Increased cost to the practice

Ofcom explains the difference between 03 and 084 numbers:

"0845/44/43 numbers include a revenue sharing component in their charges which allows part of the revenue from the calls to be passed to the organisation using one of those numbers. Geographic rate numbers (01/02/03) do not include a revenue share.

"The revenue available in those ranges is relatively low and to our knowledge is not normally passed as cash to those companies but is used to offset the cost of operating the communications systems used (eg automated call handling, answering machines, call centres etc)."

Migrating from 084 to 03 will result in the loss of a subsidy obtained (indirectly) from callers. Practices using "enhanced telephony" will therefore have to meet the full cost of the telephone system which they have chosen to use, in the same way as their colleagues using geographic numbers.

Those using the traditional approach, with a geographic number, will be paying for additional telephone lines and advanced equipment at the surgery in an attempt to avoid the engaged tone and call switching functions. These costs are saved by those using "Enhanced Telephony". Many would suggest that this is about providing the best possible service for patients, not using them as a source of funding.

I hope that enthusiasm for the use of "enhanced telephony" with the benefits referred to above will not wane if patients do not have to pay for it. I also hope that the BMA does not regard NHS GPs meeting the full cost of their chosen telephone system as "unreasonable".

I will be happy to engage in debate with anyone who wishes to argue that NHS patients should subsidise the costs incurred by NHS GPs in providing NHS services.