

## Greater Manchester Combined Authority

Date: 23<sup>rd</sup> February 2024

Subject: Public Switched Telephone Network (PSTN) Switchover Update Report

Report of: Councillor Nick Peel, Portfolio Lead for Digital and Joanne Roney, Portfolio Lead Chief Executive for Digital

---

### Purpose of Report

The purpose of the report is to provide an update to GMCA following growing concerns about the implementation of the PSTN Switchover which is impacting upon a significant number of vulnerable people and across the city region.

### Recommendations:

GMCA is requested to:

1. Note the significant issues in telecare arising from the PSTN switchover rollout.
2. Support further action including correspondence with Government to urge action in response to the current risk to adults, and to develop a funded National Action Plan that includes telecare switchover working with telecommunications providers, the telecare industry and the LGA.
3. Note the establishment of the GM PSTN Working Group as a forum to assess the readiness of GM for the switch over, share best practice and bring forward significant issues as they arise.
4. Note that there has been an exchange of letters between the Mayor and DSIT Secretary of State in December 2023 and January 2024 regarding increasing concerns of the PSTN switchover.

### Contact Officers

Phil Swan – Director of Digital [phil.swan@greatermanchester-ca.gov.uk](mailto:phil.swan@greatermanchester-ca.gov.uk)

John Steward – Connected Places Principal [john.steward@greatermanchester-ca.gov.uk](mailto:john.steward@greatermanchester-ca.gov.uk)

# Equalities Impact, Carbon and Sustainability Assessment:

## Recommendation - Key points for decision-makers

Insert text

## Impacts Questionnaire

Impact Indicator	Result	Justification/Mitigation	
Equality and Inclusion	G	<p>This proposal will positively impact and support those who are facing disadvantage by mitigating the risks that may be faced with people that face additional challenges and communicating support to help understand the change.</p> <p>This proposal will positively impact access the ability to access public services, and mitigate risks where cost is an issue.</p> <p>This proposal could support communities by actively communicating switchover changes, GM plans and potential impacts, as well as where to go for support.</p>	
Health	G	The change in infrastructure means that there could be significant negative impacts initially for sectors such as telecare and concerning impacts therefore to residents.	
Resilience and Adaptation	G	<p>This plan will positively impact residents who are digitally-excluded, dislike change and those that use telecare services.</p> <p>This proposal and plans will help drive awareness and action to empower businesses and communities navigate the switchover.</p> <p>These recommendations will not only drive awareness to GM residents, it could help mitigate risks for those classed as most vulnerable.</p> <p>This plan should help to support and mitigate risks around scamming by sharing what to look for and where to go for support.</p>	
Housing			
Economy	G		
Mobility and Connectivity	G		
Carbon, Nature and Environment			
Consumption and Production			
Contribution to achieving the GM Carbon Neutral 2038 target	N/A		
<b>Full</b> <b>G</b> Positive impacts overall, whether long or short term.	<b>A</b> Mix of positive and negative impacts. Trade-offs to consider.	<b>R</b> Mostly negative, with at least one positive aspect. Trade-offs to consider.	<b>RR</b> Negative impacts overall.

Carbon Assessment		
Overall Score		
Buildings	Result	Justification/Mitigation
New Build residential	N/A	
Residential building(s) renovation/maintenance	N/A	
New build non-residential (including public) buildings	N/A	
Transport		
Active travel and public transport	N/A	
Roads, Parking and Vehicle Access	N/A	
Access to amenities	N/A	
Vehicle procurement	N/A	
Land Use		
Le	No associated carbon impacts expected.	High standard in terms of practice and awareness on carbon.
	Mostly best practice with a good level of awareness on carbon.	Partially meets best practice/ awareness, significant room to improve.
	Not best practice and/ or insufficient awareness of carbon impacts.	

## Risk Management

The switch off the Public Service Telephone Network (PSTN) poses a significant risk to some SMEs; public and sector; voluntary, community & social enterprise organisations; and vulnerable residents.

## Legal Considerations

There are no legal considerations for GMCA

## Financial Consequences – Revenue

There are no revenue finance consequences for GMCA from this report and its recommendations.

## Financial Consequences – Capital

There are no capital finance consequences for GMCA from this report and its recommendations

## Number of attachments to the report:

None

## GM Transport Committee

Not applicable

## Comments/recommendations from Overview & Scrutiny Committee

Not applicable

## Background Papers

- Report to GMCA on Public Switched Telephone Network (PSTN) Switchover - 29<sup>th</sup> September 2023.
- External Link: [Upgrading landlines to digital technology – what you need to know - Ofcom](#)
- External Link: Public Switched Telephone Network Charter published by Government (DSIT) – 18<sup>th</sup> December 2023 [Public Switched Telephone Network charter - GOV.UK \(www.gov.uk\)](#)
- External Link: [Future of Voice – Homepage](#)
- External Link: <https://www.gov.uk/guidance/uk-transition-from-analogue-to-digital-landlines>
- External link: [Telecare stakeholder action plan: analogue to digital switchover, August 2023 update - GOV.UK \(www.gov.uk\)](#)
- External link: [PSTN - What is the consumer impact of the switch-off? - Which? Policy and insight](#)
- External link: [On the Day Process \(offta.org.uk\)](#)

## Tracking/ Process

Does this report relate to a major strategic decision, as set out in the GMCA Constitution

No

## Exemption from call in

Are there any aspects in this report which means it should be considered to be exempt from call in by the relevant Scrutiny Committee on the grounds of urgency?

## Overview and Scrutiny Committee

Not applicable

## 1. Introduction

1.1. The Public Switched Telephone Network (PSTN), the dedicated legacy telephony network that connects calls via physical phone lines, is being decommissioned in

the UK by December 2025. PSTN is an ageing network that is becoming harder to maintain, energy intensive, expensive and unreliable.

- 1.2. This process is in progress across the 600+ telecommunications providers to households and organisations, with voice services provided over PSTN being moved to digital services across the internet.
- 1.3. Unlike the move to digital TV from 2007 to 2012, which was Government-led, the withdrawal of the PSTN is industry-led as the network is privately owned – with the Government recognising that it has a responsibility to ensure the change is achieved safely and effectively.

## **2. Risks associated with PSTN switchover**

- 2.1. A report to GMCA on 23rd September 2023 highlighted a number of key risks to those households and organisations that are most reliant on PSTN services. These include:
  - Emergency and telecare call buttons and pendant alarms used in households and care homes.
  - Fax machines (they are still used in small numbers, particularly in health and social care).
  - Remotely monitored alarm systems.
  - Some point-of-sale terminals and payment card readers.
  - ISDN services such as office PBX or ISDN modems. This includes traditional commercial phone systems used by many organisations.
  - Emergency telephones in lifts.
- 2.2. The report asked GMCA to note the progress that had been made but advocated that the Government should play a “stronger and more active role in the switchover because of concerns about an industry led process”.
- 2.3. This further report follows increasing concerns relating to vulnerable people, in particular those who access telecare support.

## **3. Impacts on Telecare Services**

- 3.1. Telecare services provide monitoring, protection, and support to people remotely, typically via a device connected to a telecommunications network. Telecare devices set off an alarm when the user needs assistance – for instance, if they have a fall.

The alarm signal travels over the telephone network to an alarm receiving centres (ARC), triggering a response from the ARC or the emergency services. An estimated 1.8 million people in the UK currently use telecare services. Of these, 1.3 million use alarms in their own homes and 0.5 million in a range of care homes, supported housing and sheltered living arrangements. Based on the population of Greater Manchester, this gives a rough estimate of 100,000 people in GM using telecare services. A high proportion of users are supported through local authority social care and housing services. However, a significant number also receive private telecare support.

- 3.2. Despite assurances from the major industry communications companies that vulnerable people would be treated with additional care, cases are arising where vulnerable telecare users are being switched over without sufficient checks to ensure that these lifeline devices still operate effectively.
- 3.3. Recognising this, in December 2023 Government introduced a new Public Switched Telephone Network Charter (see background papers). However, at a GM PSTN Working Group meeting in late January 2024 attended by 60 people, it was confirmed that cases are still regularly occurring of vulnerable people being left without telecare services as a result of switchover, presenting a significant adult safeguarding risk. Concerns extended to privately funded users of telecare services.
- 3.4. It was also clear that there were concerns regarding households with vulnerable residents who are not using telecare services, but nonetheless could be classed as more vulnerable. There was evidence of households reliant on landlines to call relatives or 999 services if needed, but who are not being offered battery back-ups in case of power cuts. This is at odds with guidance from Ofcom.
- 3.5. Ofcom recently announced a specific new investigation relating to an individual telecommunications company and how it is “identifying, protecting and supporting vulnerable customers and ensuring uninterrupted access to emergency organisations”. Having examined current telecoms processes and considering feedback from telecare services across GM, we believe that this is an industry wide issue that requires Governmental accountability and oversight.
- 3.6. The cost of upgrading and operating telecare equipment is also of significant concern, with operators reporting a 240% increase compared with analogue service cost. There is no dedicated funding available from Government to local services to

support the investment needed. As referenced in the September 2023 report to GMCA, Stockport Homes estimated a £1.5M cost for implementation of new equipment for its 5,000 users, indicating a GM wide cost of £30M. This is leading to telecare service providers considering introducing charges, or downgrading services, with negative impacts for users.

- 3.7. As well as the large and diverse range of 600+ telecommunications providers, the telecare sector is complex with over 150 providers across the UK ranging from full-service provision by local authorities (from providing telecare equipment, monitoring and emergency response) to hybrid models with private sector elements, and full private sector services.
- 3.8. The large communications providers such as BT and Virgin Media have asked local authorities and private telecare providers to agree Data Sharing Agreements to enable them to identify households with vulnerable people. Whilst this is supported in principle by local authority and housing services in GM, it is not viable those organisations to share lists of vulnerable people with hundreds of the smaller communications providers without breaching of data protection legislation. The Local Government Association (LGA) calculated if every local authority created a data sharing agreement with each telecommunication provider then approximately, 190,000 agreements would be required.
- 3.9. In addition, whilst local authorities and housing organisations have visibility of their users, there are significant numbers of privately and healthcare funded telecare users in GM.

## **4. The need for a funded National Action Plan**

- 4.1. Across Greater Manchester work is already underway to switchover households with telecare services that are local authority provided or commissioned. Some areas are well advanced; however, whilst a number of national policy and procedure documents have been developed and a Charter produced, there are significant inconsistencies in practice across the large and diverse communications industry and telecare providers, and a lack of holistic coordination.
- 4.2. Standards are either lacking, or if they have been defined, they are inconsistently adopted. Safeguards are insufficient and there does not appear to be any robust national reporting mechanism relating to incidents and near misses. In particular:
  - There is no agreed national process to identify households with telecare devices

nor an agreed definition on vulnerability or who is vulnerable in this regard.

Whilst the PSTN Charter calls for a definition of vulnerability, it is not yet in place although switchover continues.

- There is also currently a reliance on telecare providers, such as local authorities and housing organisations, to share data with communication providers, with the onus on telecare users to self-identify as vulnerable. There is a need for a more effective, joined up, and pro-active approach.
- The August 2023 telecommunications 'On the Day' guidance for Openreach dependent telecommunications providers appears to be insufficiently adopted or robust enough and makes assumptions about the responsibilities of telecare providers. There is a need for a joint one with the telecommunications sector that is consistently adopted by organisations undertaking switchover.
- Despite the good work by the LGA in generating content on PSTN switchover that is being used by Local Authorities with their communities, communications to households in relation to switchover are fragmented and supplier dependent. A recent Which? Survey revealed that 74% of consumers were unaware of the impending migration. There is a need for a joined-up communications plan including a single consumer facing place where people with concerns can go to find out about PSTN switchover and what to expect, regardless of who their communications or telecare provider is.

4.3. The publication of the PSTN Charter together with the recent emergence of a communications plan led by BT and the establishment of a Telecare Advisory Board (which is still industry led) are important steps forward. But this does not go far enough. A National Action Plan overseen by Government is urgently needed to ensure that the telecommunications industry's guarantee, that no vulnerable person is left disconnected, can be demonstrably achieved. It is proposed this should include as a minimum:

- A mandatory requirement that any of the 600+ communication providers which are implementing switchover sign up to the PSTN Charter before continuing implementations, and that the common definition of vulnerability referenced in the Charter is established before work continues.

- An agreed Telecare Industry Charter setting out the switchover responsibilities of that sector to sit alongside the PSTN Charter agreed with telecommunication providers.
- A national communications plan that is Government fronted and financed.
- An agreed, joint, and adopted LGA, NHS, telecommunication and telecare sectors “On the Day” process for public and privately funded telecare users, and other people at higher risk.
- A centrally co-ordinated approach to data sharing that enables proactive PSTN switchover support, between public and private telecare providers and telecommunications sector and in relation to households with vulnerable people.
- Enforcement and implementation of a reporting mechanism to record and escalate serious issues as they arise.
- One-off Government capital funds to assist organisations such as housing associations and care providers to invest in digital equipment for the purpose of switching over the telecare service.

## **5. Next steps**

- 5.1 GMCA is continuing to work closely with the LGA, telecommunications providers and the telecare services association to support a smooth transition across the city region for GM local authorities and their partners. However, as set out in this report, fundamental risks around the national coordination of PSTN switchover for vulnerable people, including telecare users, need to be addressed urgently.