



## Case T-116

# Update to guidance on the provision of a public emergency call service

## Response to consultation and final Guidance

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# 1 Overview and summary

- 1.1 The legal duties of the Jersey Competition Regulatory Authority (the **Authority**) include a primary one to ensure that telecommunications services are provided to satisfy all current and prospective demands for them. One demand critical for the safety and security of Islanders and visitors is being able to contact the Emergency Services (**ES**) by dialling either 112 or 999.
- 1.2 The availability and reliability of this Public Emergency Call Service (**PECS**) is of paramount importance to the Authority, which has responsibility for licensing telecoms providers required to provide the service. The obligation to provide a PECS is set out in conditions contained in the licences issued to Class II and Class III licensed operators (**LOs**).<sup>1</sup>
- 1.3 The Authority issues guidance on the provision of a PECS (the **Guidance**) to provide important supplemental information for LOs, clarifying how they should go about meeting their licence condition obligations. The expectations included within the Guidance may also be taken into account by the Authority when investigating and assessing the cause and impact of any PECS incidents.
- 1.4 Following recent developments relating to the provision of a PECS in Jersey, the Authority is updating the Guidance. One development involved implementing a new technical platform to answer calls made to the ES (the **CHA / ES Technology Platform**). Another was the creation of a new 999 Liaison Committee (the **Liaison Committee**) and its issuing of a code of practice (the **PECS Code**) setting out several best practice recommendations for organisations involved in the local provision of a PECS.
- 1.5 Aligned with its regulatory processes, the Authority carried out a non-statutory consultation on the proposed update and has considered responses received before issuing final Guidance.<sup>2</sup>
- 1.6 This document contains a consideration of responses received and the Authority's final decision on this matter, which is to:
  - (a) Section 1: update paragraph 1.5 to acknowledge the new PECS Code and adjust wording within the Guidance for this purpose;
  - (b) Section 2: update to include new End-to-End sub-section to ensure clarity of licence condition obligations for LOs to provide a PECS following changes made as a result of implementing the new CHA / ES Technology Platform used to answer calls made to the ES;
  - (c) Section 3: update paragraph 3.16 to incorporate guidance on the use of automated answer/response systems within the CHA function; and

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<sup>1</sup> Stated in Licence Condition 14.

<sup>2</sup> JCRA 24/21 Update to guidance on the provision of a public emergency call service – see [here](#).

(d) Section 3: update to include reference to the Government of Jersey owned CHA / ES Technology Platform and guidance on expectations on LOs in relation to it.

1.7 The document also contains the final Guidance in Annex A, with updates from the last version clearly shown. The Authority considers this final and current, with a 'clean' version on the JCRA website or available on request. Any further proposed update will be made through a similar non-statutory consultation process before being adopted by the Authority.

## 2 Introduction and background

2.1 This section introduces the Guidance and provides background on the Authority's consultation on updates. Its contents are:

- The provision of PECS in Jersey and role of guidance
- Consultation background and purpose
- Legal framework and planned timetable

### The provision of PECS in Jersey and role of guidance

2.2 The Authority's legal duties include a primary one to ensure that telecommunications services are provided to satisfy all current and prospective demands for them. One demand critical for the safety and security of Islanders and visitors is being able to contact the ES by dialling either 112 or 999.

2.3 Being able to communicate with the ES through a dedicated telephone number is a firmly-established principle. Given the potentially life-threatening consequences associated with ES calls, the availability and reliability of the Island's PECS is of paramount importance to the Authority.

2.4 The obligation for Class II and Class III LOs to provide a PECS is contained in Licence Conditions 14.1 and 14.2, which require each operator to provide an 'end-to-end' service, with responsibility for ensuring its users are able to communicate free of charge with the relevant ES following an emergency. This end-to-end obligation includes two elements:

- (a) **Conveyance obligation:** connecting calls from end users over the network and service elements used to convey emergency calls to the Call Handling Agent (**CHA**) function; and
- (b) **CHA obligation:** answering received calls and connecting to the appropriate ES, e.g. police, ambulance, fire service or coastguard.

2.5 Class III LOs have a further licence obligation contained in LC 14.3, which is to make emergency call services available to other LOs. This is presently addressed by Class III LO JT (Jersey) Limited through its Emergency Services Access Service (**ESAS**) available to other LOs through JT's Reference Interconnect Offer (**RIO**) and which has historically provided and presently provides the CHA function.

2.6 In June 2022, the Authority issued the Guidance to provide important supplemental information for LOs, clarifying how they should go about meeting their licence obligations.<sup>3</sup> The expectations included within the Guidance, which apply to all Class II and Class III licence holders obliged to

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<sup>3</sup> JCRA 22/25 Guidance on the provision of a public emergency call service— see [here](#).

provide a PECS service. may also be taken into account by the Authority when investigating and assessing the cause and impact of any PECS incidents.

## Consultation background and purpose

- 2.7 The present Guidance recognises that providing an effective PECS requires the active involvement of several parties, including Justice and Home Affairs (**JHA**), the Government of Jersey department responsible for providing ES in the Island. The Guidance also explained that JHA may produce codes of practice or similar addressing emergency call answering and handling standards or the provision of certain emergency call service features.
- 2.8 The JHA subsequently formed the Liaison Committee, which includes representatives from all parties involved in providing the Island’s PECS. This has produced the PECS Code, which details best practice information on the provision of a PECS for use by all parties involved.
- 2.9 The PECS Code also recognises the use of a recently implemented CHA / ES Technology Platform which is a combined emergency services control centre / emergency call handling technology platform owned by the Government of Jersey and which supports both the CHA function and ES call handling duties.
- 2.10 The Authority believed it important to review the Guidance given these developments – the Liaison Committee, the PECS Code and CHA / ES Technology Platform – and ensure its contents both acknowledge and potentially change to accommodate them. A consultation issued in April 2024 explained proposed updates and invited responses to several specific questions:

Question 1: Do you agree with the proposed update in Section 1 to accommodate certain points contained in the agreement between parties responsible for providing the Island’s emergency call handling service? If not, please explain why.

Question 2: Do you have any comments on the proposed update to Section 2 to restate end-to-end obligations on providing a PECS following changes in the technical platform arrangements?

Question 3: Do you agree with the proposed update to Section 3 incorporating guidance on the use of automated answer/response systems? If not, please explain why.

Question 4: Do you have any comments on the proposed update to Section 3 to include a reference to the CHA / ES technology platform and clarify associated expectations on LOs?

- 2.11 The consultation closed on 31 May 2024, after which the Authority considered responses received and identified any appropriate and necessary changes to its proposed updated Guidance. Section 3 of this document contains a summary of responses received, the Authority’s analysis and conclusions.

## Legal framework and planned timetable

### Powers to issue and consult on guidance

- 2.12 The Telecommunication (Jersey) Law 2002 (the **Law**) sets out the primary duty of the Authority is to perform its functions as to ensure that telecoms services are provided that satisfy all current and prospective demands for them.
- 2.13 Section 7 of the Law includes a specific JCRA duty to: ‘ . . . protect and further the short-term and long-term interests of users within Jersey of telecommunication services and apparatus . . .’.
- 2.14 The Authority has issued licence conditions on the provision of a PECS, which it believes protects and furthers the short-term and long-term interests of users within Jersey. The Authority has issued Guidance to ensure that LOs more fully understand and take account of their obligations under these licence conditions.
- 2.15 While the issuing of Guidance, which is not legally binding, is outside the Authority’s statutory duties, Section 9 (2) of the Law requires the Authority to consider any representation made to it on the running of a telecommunication system and the provision of telecommunication services in Jersey. The Authority believes the consultation aligns with this requirement, and with best practice policy making.

### The process followed and planned timetable

- 2.16 Although the subject of this consultation does not relate to a specified statutory function, the Authority has followed a structure broadly based on the process set-out in article 11 of the Law.
- 2.17 The timetable, which may be subject to change, for completing the process is:

Apr 2024	Issue the consultation setting out the Authority’s updated Guidance for views and comments.
May 2024	Close the consultation and consider views and comments received.
Jul 2024	Issue this statement confirming the updates being made and the final Guidance.

### 3 Consideration of responses to consultation

3.1 This section contains summary details on responses received to the consultation, explains how the Authority has analysed them and conclusions drawn. Its contents are:

- [Consultation responses received](#)
- [Consideration of responses to consultation questions 1 - 4](#)

#### Consultation responses received

3.2 The consultation closed on 31 May 2024, with responses<sup>4</sup> received by that date or later with exceptional agreement from the following organisations:

- 999 Liaison Committee (**Liaison Committee**)
- Clear Mobitel (Jersey) Limited (**Clear**)
- Jersey Airtel Limited (**Airtel**)
- Sure (Jersey) Limited (**Sure**)

3.3 A further confidential response was received and has been responded to separately.

3.4 The Authority is grateful to all respondents for the time and care taken to provide comments and views on this important subject and has published non-confidential versions on its website alongside this document.

#### Consideration of responses to consultation question 1

Question 1: Do you agree with the proposed update in Section 1 to accommodate certain points contained in the agreement between parties responsible for providing the Island's emergency call handling service? If not, please explain why.

#### Summary of responses received

3.5 The Liaison Committee supports the proposed update, while suggesting certain changes to better clarify its role and the PECS Code of Practice function.

3.6 Clear and Airtel agree with proposed update to Section 1.

3.7 Sure believes the proposed update does not accurately reflect how the PECS Code of Practice is produced and maintained, proposing a change that incorporates the wording suggested by the Liaison Committee in its consultation response.

3.8 Sure further notes a paragraph in this section which it believes has been included in error.

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<sup>4</sup> Non-confidential versions of responses are published on the Authority's website alongside this document.



## Authority analysis

- 3.9 The Liaison Committee's suggestion that it is more explicitly referenced and explained in the Guidance has merit given that body's important role in the provision of a PECS. However, the Authority is mindful that the Liaison Committee's role and responsibilities, composition and any associated terminology may change in the future without notice, or that as a non-statutory body it may cease to exist without a recognisable successor (a situation less likely to occur for the JHA as a whole). In this event, any explicit reference in the Guidance to the Liaison Committee and its role may become invalid and require the Authority to update the Guidance to reflect any changes through a potentially resource intense and time consuming process.
- 3.10 Considering the point made by Sure, the Authority again recognises that the request to modify Section 1 to more explicitly reference the Liaison Committee has validity but may equally present the challenge explained in paragraph 3.18 above.
- 3.11 The Authority thanks Sure for drawing attention to the inclusion of text in this section which it correctly believes was included with the draft Guidance in error. This will be removed from the final Guidance.

## Authority conclusions

- 3.12 The Authority will make what it believes are appropriate wording changes to Section 1 encompassing the Liaison Committee but ensuring continued reference to the JHA. These changes will also address the related concerns raised by JT and Sure. The new updated Guidance will include the following amend:

- (a) Change paragraph 1.5 to:

The Authority recognises that providing an effective PECS requires the active involvement of several parties, including Justice and Home Affairs (JHA), the Government of Jersey department responsible for providing ES in the Island.<sup>1</sup>, ~~which may produce codes of practice or similar addressing emergency call answering and handling standards or the provision of certain emergency call service features.~~ JHA has established and oversees a body comprised of representatives of all parties to the provision of the PECS which produces and maintains a Code of Practice addressing best practice emergency call answering and handling standards, the provision of certain emergency call service features and explaining how the parties will work together to deliver an effective PECS.<sup>2</sup>

### Footnotes

1. Or its successors.
2. The 999 Liaison Committee which contains representatives from JHA including the Emergency Response Organisations (Ambulance, Coastguard, Fire & Rescue and Police) and licensed operators. Representatives from the Jersey Government and the

Jersey Competition Regulatory Authority also play an important role within the Committee.

(b) Remove Paragraph 1.7.

## Consideration of responses to consultation question 2

Question 2: Do you have any comments on the proposed update to Section 2 to restate end-to-end obligations on providing a PECS following changes in the technical platform arrangements?

### Summary of responses received

- 3.13 The Liaison Committee recognises the need for clarity in obligations and responsibilities among the several parties involved in providing a PECS. It also refers to one member's specific concern about the proposed diagram in Section 2.
- 3.14 Clear notes the necessity of ensuring the integrity of the connection between LO and JT (as the Class III operator) allowing ES traffic to be passed from one to the other.
- 3.15 Airtel has no comments to offer for this question.
- 3.16 Sure disagrees with the proposed update to Section 2 of the Guidance, offering extensive opinions on licence condition obligations and advancing a fundamental view that LOs are only obliged to meet the Conveyance obligation and not the CHA obligation.
- 3.17 Sure further states the Conveyance obligation placed on Class II licensees is more nuanced than described and depicted in the proposed update, a situation it points out the JCRA recognised in its analysis of Sure's response to an earlier consultation on 999 Guidance.

### Authority analysis

- 3.18 The Authority concurs with the Liaison Committee's point on clarity, which is the purpose of the proposed update to Section 2 of the Guidance, and notes Clear's comments on connection integrity.
- 3.19 Considering the position taken by Sure on licence condition obligations, the Authority's position is that there has been no change in the regulatory landscape between issuing the present Guidance and the proposed updated Guidance. However, the Authority recognises that recent changes to the provision and coordination of the PECS – i.e. moving to the new CHA / ES Technology Platform, creating the Liaison Committee and issuing the PECS Code – need addressing within the Guidance, which will provide the required and requested clarity on licence condition obligations. For the avoidance of doubt, the proposed updates to Section 2 reinforce the Authority's clearly and consistently communicated position that Licence Condition 14.1

obliges LOs to provide an end-to-end service between the user and the ES that includes delivering or purchasing CHA call handling.<sup>5</sup>

3.20 Considering Sure’s point on conveyance obligations placed on Class II licensees being more nuanced than described and depicted in the proposed update, the Authority reminds that it has already addressed this situation within its response to the consultation on the present Guidance, specifically paragraph 3.16 which addresses the matter of responsibilities when LOs choose outsourced or contracted arrangements to provide an end-to-end PECS.<sup>6</sup>

### **Authority conclusions**

3.21 The Authority believes its proposed updates to Section 2 provide important additional and necessary clarity on obligations placed on Class II and Class III LOs PECS Licence Conditions, which have not changed following moving to the new CHA / ES Technology Platform, creating the Liaison Committee and developing the PECS Code.

3.22 While welcoming the challenges advanced by Sure in connection with this consultation question, the Authority believes it has already considered them in detail within earlier investigations and consultations relating to the provision of a PECS in Jersey. For the avoidance of doubt, Class II and Class III LOs must provide an ‘end-to-end’ PECS service that allows members of the public to call 112 or 999 and be promptly connected to the ES. The obligation starts when a user dials 112 or 999 and ends when that user is connected to the police, ambulance, fire service or coastguard.

## **Consideration of responses to consultation question 3**

Question 3: Do you agree with the proposed update to Section 3 incorporating guidance on the use of automated answer/response systems? If not, please explain why.

### **Summary of responses received**

3.23 The Liaison Committee is comfortable with the wording contained in the proposed update clarifying the use of automated answer/response systems, while noting that automation may become a more suitable option in future as technology develops.

3.24 Clear agrees that automated answering/responses should be avoided other than during exceptional traffic circumstances.

3.25 While noting the potential benefits of automated systems, Airtel agrees with the proposed change.

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<sup>5</sup> See JCRA Document No: JCRA 20/27: Emergency call service outages in Jersey during early 2020: a decision to give a Direction to each of JT (Jersey) Limited and Sure (Jersey) Limited – see [here](#).

<sup>6</sup> Ibid.

- 3.26 Sure has no specific comment on the proposed update, but provides a lengthy commentary on the general provision of a CHA function, arguing that the related section in the Guidance should be removed entirely because Sure believes the CHA function falls outside the scope of Class II and Class III licensees.
- 3.27 Sure goes on to propose that if the CHA function section of the Guidance remains, it should be modified to incorporate the JHA's ownership of the CHA / ES Technology Platform.

### **Authority analysis**

- 3.28 The Authority welcomes the support for this proposed update to Section 3 offered by several respondents.
- 3.29 The Authority is clear that the CHA obligation includes answering calls to 112 and 999, and that the Guidance already contains call answering service performance expectations. The Authority also believes the proposed update provides further clarity for those responsible for meeting these expectations, especially if considering future system enhancements or efficiencies. However, it further reminds that the Guidance does not preclude the use of automated answer / response systems and accepts there may be times when such use is required.
- 3.30 Additionally, the Authority acknowledges the Liaison Committee's important role in developing Jersey's PECS, and that the use of automated answer / response systems may become essential or beneficial to providing Islanders and visitors with a reliable and efficient service in the future.

### **Authority conclusions**

- 3.31 The Authority will update Section 3 of the Guidance to include the proposed paragraph covering automated answer / response systems.
- 3.32 However, the Authority reminds that Jersey's PECS can and should be developed to provide an improved service for end users, which could include the use of automated answer / response systems, and that the Liaison Committee has a key role in considering and advancing such service enhancements.

## **Consideration of responses to consultation question 4**

Question 4: Do you have any comments on the proposed update to Section 3 to include a reference to the CHA / ES technology platform and clarify associated expectations on LOs?

### **Summary of responses received**

- 3.33 The Liaison Committee finds the description of the CHA/ES technology platform contained in the proposed update is simple and clear, noting that the ES has similar obligation to LOs for seeking assurances in the resilience, reliability and effectiveness of the PECS as a whole.
- 3.34 Clear expects JT (as Class III operator) to be responsible for the CHA / EA technology platform.

3.35 Airtel welcomes the inclusion of reference to the CHA/ES technology platform, finding it sets clear expectations.

3.36 Sure believes the update to Section 3 of the Guidance is unnecessary or should be amended to place responsibility and accountability for the CHA / ES technology platform with the JHA.

### **Authority analysis**

3.37 The Authority welcome the supportive points from the Liaison Committee, Clear and Airtel, noting the point on the ES seeking mutual assurance from the LOs.

3.38 Considering the comments provided by Sure, the Authority refers to its previous analysis of responses to Question 2 and resulting conclusion.

### **Authority conclusions**

3.39 The Authority will add the proposed update to Section 3 of the Guidance, which means including a reference to the CHA / ES technology platform and clarify associated expectations on LOs.

# Annex A: Final updated Guidance

This section contains the final updated Guidance showing marked-up changes from the present version.

## 1 Introduction

- 1.1 The ability to dial a short single number to call the police, ambulance, fire service or coastguard (jointly the **Emergency Services** or **ES**) is key for the safety and security of Jersey's citizens and visitors. Given this, the performance and security of a Public Emergency Call Service (**PECS**) is critically important to the Authority.
- 1.2 The Class II and Class III licences issued by the Authority to certain local telecoms operators require them to provide a PECS that enables users to communicate with the ES by calling 112 or 999. This obligation is met by licensed operators providing an end-to-end PECS that allows members of the public to call 112 or 999 and be promptly connected to the ES.<sup>7</sup>
- 1.3 Class III LOs have a further licence obligation contained in LC 14.3, which is to make emergency call services available to other local operators (**LOs**). This is presently addressed by Class III LO JT (Jersey) Limited through its Emergency Services Access Service (**ESAS**) available to other LOs through that company's Reference Interconnect Offer (**RIO**) and which has historically provided and presently provides the emergency Call Handling Agent (**CHA**) function described within the Guidance.
- 1.4 This Guidance sets out the Authority's expectations on how Class II and Class III licensed operators should approach compliance with these PECS-related licence conditions. It may be taken into account in enforcement actions against licensed operators on other binding requirements including the obligation to provide a PECS and CHA.
- 1.5 The Authority recognises that providing an effective PECS requires the active involvement of several parties, including Justice and Home Affairs (JHA), the Government of Jersey department responsible for providing ES in the Island.<sup>8</sup> ~~which may produce codes of practice or similar addressing emergency call answering and handling standards or the provision of certain emergency call service features.~~ JHA has established and oversees a body comprised of representatives of all parties to the provision of the PECS which produces and maintains a Code of Practice addressing best practice emergency call answering and handling standards, the provision of certain emergency call service features and explaining how the parties will work together to deliver an effective PECS.<sup>9</sup>

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<sup>7</sup> Obligation confirmed by a Direction to JT (Jersey) Limited and Sure (Jersey) Limited in November 2020 within JCRA Document No: JCRA 20/27.

<sup>8</sup> Or its successors.

<sup>9</sup> Presently fulfilled by the 999 Liaison Committee which contains representatives from JHA including the Emergency Response Organisations (Ambulance, Coastguard, Fire & Rescue and Police) and licensed operators. Representatives from the Jersey Government and the Jersey Competition Regulatory Authority also play an important role within the Committee.

## 2 Legal context, scope and enforcement

### Legal context

- 2.1 The requirement for Class II and Class III licensed operators to provide a PECS is contained in Licence Conditions 14.1 and 14.2, which require the provision of a free of charge service to users allowing them to communicate with the ES by using codes 112 and 999.
- 2.2 The requirement for Class III licensed operators to provide emergency call services available to other licensed operators is contained in Licence Condition 14.3. This supports expectations set-out within this Guidance for the provision of a CHA function.
- 2.3 The requirement for Class II and Class III licensed operators to provide the Authority with information, including reports, is contained in Licence Condition 4, which supports expectations set-out within this Guidance for PECS performance and incident reporting.
- 2.4 The requirement for Class II and Class III licensed operators to take all reasonable steps to ensure network integrity is contained in Licence Condition 9, which supports expectations set out within this Guidance to ensure PECS resilience and reliability.<sup>10</sup>

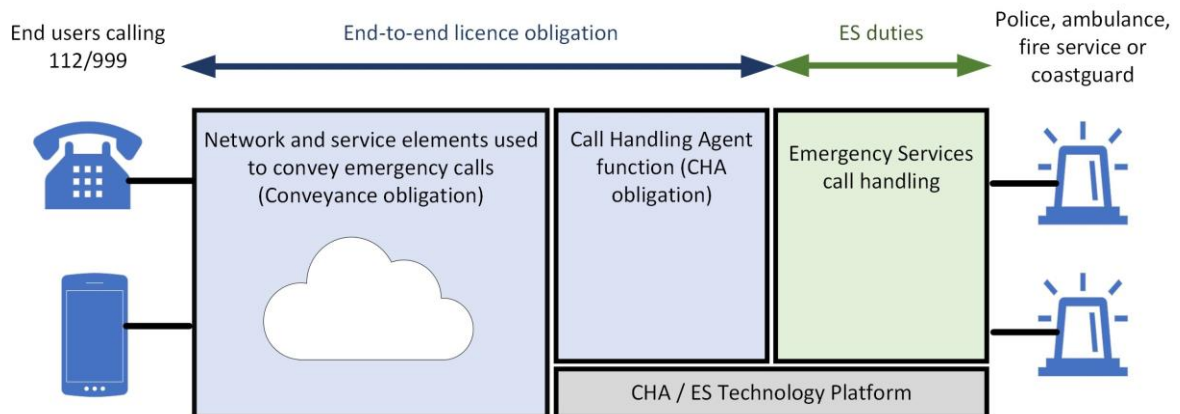
### End-to-End licence obligations

- 2.5 Licence Conditions 14.1 and 14.2 place an end-to-end obligation on Class II and Class III licensed operators to provide a PECS that connects end users calling 112 and 999 to the ES. This end-to-end obligation consists of two elements:
  - **Conveyance obligation:** connecting calls from end users over the network and service elements used to convey emergency calls to the CHA function; and
  - **CHA obligation:** answering received calls and connecting to the appropriate ES, e.g. police, ambulance, fire service or coastguard.

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<sup>10</sup> Licence Condition 9.1 states that 'The Licensee shall take all reasonable steps to ensure the integrity of the Network...'

2.6 [For clarity the scope of these obligations are shown graphically in Diagram 1 below:](#)



*Diagram 1: licensed operator obligations associated with emergency service calls*

2.7 [Class III licensed operator JT presently addresses the provision of a CHA function through its Emergency Services Access Service \(ESAS\), which is made available to other licensed operators obliged to provide a CHA function through JT’s Reference Interconnect Offer \(RIO\), which presently allows other licensed operators to discharge their end-to-end licence obligation.](#)

## Scope

- 2.8 This Guidance applies to all Class II and Class III licence holders obliged to provide a PECS service.
- 2.9 Its focus is on underlying resilience and reliability of networks and systems used to convey calls to the ES, and the effectiveness of any associated processes and people. When providing a PECS, licensed operators should also take into account any codes of practice or similar issued by JHA which may relate to emergency call answering and handling standards or the provision of certain emergency call service features.
- 2.10 The Authority may need to make changes to this Guidance from time-to-time and will consult on these changes in the usual way as and when appropriate.

## Enforcement

- 2.11 Although this Guidance is not legally binding, the Authority may take it into account in enforcement action against other binding requirements, including licence conditions.



## 3 Guidance for licensed operators providing a public emergency call service

3.1 This section sets out the principles for licensed operators providing a PECS on how it should be provided to meet the requirements of their licence conditions. Its contents are:

- Overarching principles
- Access network resilience
- VoIP considerations
- CHA function
- [CHA/ES technology platform](#)
- Service management and development
- Service reporting
- Incident reporting

### Overarching principles

3.2 Given the potentially life-threatening or personal security-related consequences involved, Islanders and visitors should have access to a reliable and high-standard PECS comparable to that available in other relevant jurisdictions.<sup>11</sup>

3.3 While the end-to-end process of providing a complete local emergency service relies on several separate and distinct activities that may be undertaken by different organisations, licensed operators should recognise they have a pivotal role in achieving the reliability and high-standard expected and should focus every reasonable effort towards designing, developing, maintaining and managing the networks, systems, people and processes needed to connect users with the ES.

3.4 Licensed operators should further monitor network and service elements used to convey emergency calls and be able to report on reliability and detect loss of service incidents, which should be reported to the Authority and may be investigated.

3.5 Additional to this Guidance, licensed operators should be aware of and aim to comply with any reasonable requests, instructions, code of practice or similar issued by JHA in connection with providing a local PECS to the expected standard.

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<sup>11</sup> While not required to apply national or international best practice standards, we refer to guidance provided by UK communications regulator Ofcom or contained within the European Electronic Communications Code or its successors.

## Operator network resilience

- 3.6 Licensed operators should ensure their networks and services are generally reliable and resilient with extra attention given to network and service elements used to convey calls to the ES.
- 3.7 Given the critical nature of ES calls, licensed operators should take enhanced measures to ensure uninterrupted access through effective design, building and maintaining of any element associated with ES calls. These include but are not limited to network infrastructure, systems, buildings, power, processes and people. The Authority recognises that various industry standards exist to establish best practice in some of these areas and commitment to and compliance with such standards is always to be encouraged.<sup>12</sup>
- 3.8 Particular attention should be taken to avoid single points of failure associated with any elements carrying ES calls where it is reasonably possible to do so. Concessions to this may be where geographical or physical constraints exist or where doing so may be disproportionately expensive.
- 3.9 Licensed operators may decide to outsource to third parties some or all of their elements of the operator network associated with ES calls. In this case, sufficient levels of contractual control over third parties should be in place to ensure continued compliance with licence condition obligations and the expectations set-out in this Guidance.

## VoIP considerations

- 3.10 Licensed operators providing services over broadband connections using Voice over IP (**VoIP**) technology should take into account the impact of power cuts on a user's ability to make ES calls.
- 3.11 Attention is also drawn to ensuring ES calls made using any VoIP service in Jersey are correctly routed to Jersey's ES.

## CHA function

- 3.12 The Authority would expect licensed operators providing a CHA function to establish appropriately enhanced organisational structures, operational processes, networks and systems and that these are continually monitored and managed to ensure that they remain effective. There should also be close liaison and understanding with JHA to ensure staff and management associated with the CHA are meeting expressed responsibilities.
- 3.13 Given the safety of life implications associated with emergency calls, the Authority expects licensed operators providing an CHA function to achieve the following KPIs:

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<sup>12</sup> Commitment to relevant ISO standards or equivalent for example.

- **Service availability:** the CHA function should be designed and managed to remain operational (in that incoming calls can be answered at any level of performance) 99.999% of the time ('five nines' availability), measured on a monthly basis<sup>13</sup>. Such availability encompasses all elements of the CHA function including systems, networks and personnel. This target complements the call answer time performance criterion below, where the Authority would expect a strict constraint on the allowable degradation of service that can occur.
  - **Service performance:** in conjunction with the service availability expectations stated above the Authority would expect that 95% of calls made to 999 or 112 that are received into CHA call queues will be answered within five seconds, as measured over a 24-hour period (midnight to midnight). Any calls abandoned by the caller without answer within 5 seconds need not be included though should be noted.
- 3.14 The Authority accepts there may be occasions when achieving these KPIs is not possible due to exceptional circumstances, including but not limited to:
- Major site loss or damage;
  - Unavoidable unscheduled staff evacuations;
  - Wide-scale staffing challenges caused by unpredictable Island-wide issues;
  - Severely disrupting weather events; and
  - Unforeseen major local incident.
- 3.15 Notwithstanding this, the Authority expects licensed operators to take all reasonable steps to avoid or minimise the risk of exceptional circumstances affecting their ability to provide the ES function and have arrangements in place to rapidly restore services should they occur.
- 3.16 [The Authority also expects that outside of the exceptional circumstances described in 3.14 above, the CHA should avoid the use of automated answer/response systems through ensuring sufficient human call operators are available. However, the Authority accepts there may be times when the use of automated messages may be a proportionate response to higher than anticipated call volumes reaching the CHA.](#)
- 3.17 Given the complexities involved in providing an CHA function the Authority recognises that licensed operators may choose to contract another licensed operator or competent agency to provide this service on their behalf. In this case, the Authority reminds the originating licensed operator that they remain responsible for ensuring reliable and resilient interconnect arrangements to a level established by the expectations of this Guidance are in place to provide for assured emergency calls continuity and, as part of the arrangements, are able to satisfy

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<sup>13</sup> Availability = (Uptime/Total Time), where Uptime is time during which the CHA is able to answer incoming calls and Total Time is the sum of the Uptime and Downtime.

themselves that the CHA function is being performed according to the expectations set out in this Guidance.

- 3.18 Given the critical nature of the service, however, in the event a licensed operator chooses to outsource their CHA function responsibilities to another licensed operator or competent agency, they should only do so to one evaluated and approved by JHA.

### CHA / ES technology platform

- 3.19 Jersey operates a combined emergency services control centre / emergency call handling technology platform that supports both the CHA function and ES call handling duties. This platform is owned by the Government of Jersey and deployed in a redundant configuration to ensure resilient functionality.
- 3.20 Given the safety of life implications associated with emergency calls, the Authority expects licensed operators to satisfy themselves that the technology platform used to support the CHA function is being provided and operated according to the expectations set out in this Guidance.

### Service management and development

- 3.21 To ensure appropriate focus on the quality and provision of a PECS service, licensed operators should designate a single point of responsibility within their organisation for ensuring effective service management and development and to be ultimately accountable for them within the organisation.
- 3.22 The Authority would expect licensed operators to ensure their emergency calls handling systems are developed to include best practice functionality comparable with that found in other relevant jurisdictions and to cooperate, where it is reasonably possible to do so, with requests from JHA for service and feature development. In particular, the technical functionality used to ascertain and provide accurate and reliable caller location information.

### Service reporting

- 3.23 For assurance, licensed operators should monitor and record data on ES calls they convey and the reliability and resilience of all associated network and service elements.
- 3.24 Licensed operators providing an CHA function, whether directly or through an outsourced arrangement, should be able to demonstrate the effective operation of their service and successful interoperability with JHA. The Authority may request periodic reports to evaluate this, to ideally include:
- Service availability against KPI expectations;
  - Number of calls received (within a period – e.g. day, week, month);
  - Call answering times against KPI expectations; and

- Average call handling times.

## Service incidents

3.25 The Authority considers any loss of ES calls to be urgent in nature and therefore service failure incidents should be reported to the Authority as soon as possible and ideally within 24 hours of a licensed operator becoming aware of them.

3.26 The Authority would expect licensed operators to use the following criteria when determining which incidents to report:

Network / service type	Minimum number of users affected	Minimum duration of service loss or major disruption
Fixed or mobile network providing access to the emergency services	100	1 hour
Fixed or mobile network providing access to the emergency services	1,000	Any duration
CHA function	Any service disruption leading to a failure to achieve KPIs or being unable to pass calls to JHA.	

3.27 In addition to above, the Authority would expect licensed operators to report any incident involving ES calls that may attract significant media attention.

3.28 The Authority may agree or establish different criteria or reporting thresholds for individual licensed operators from time-to-time, in view of exceptional circumstances that may limit their ability to report for a period or because enhanced reporting is required for a period

3.29 Incident reports should contain the following information:

- Licensed operator name;
- A unique reference number for the incident;
- Date and time of the incident;
- Number of affected users and the nature and duration of service disruption they experienced; and
- Whether incident is resolved or ongoing.

3.30 The Authority would expect licensed operators to provide us with periodic updates on any ongoing incidents and a final update once resolved.

3.31 The Authority would expect licensed operators to also comply with incident reporting requirements established in any reasonable requests, instructions, code of practice or similar issued by JHA in connection with providing a local PECS to the expected standard.