

## Action plan for mobile operator (MNO) close working during the Covid-19 Epidemic

1. In view of the exceptional circumstances facing the country, the UK's mobile operators (MNO), where it's deemed efficient and effective, have decided to work closely with each other, to the extent necessary in the national interest to support customers and key stakeholders, to face the current challenges. **All actions taken jointly, nonetheless, will continue to take account of operators' obligations under competition law.**
2. The following areas have been prioritised for co-operation:
  - a) Escalating problems related to site access (for essential maintenance and similar)
  - b) Requests for specific support, e.g. mobile connectivity<sup>1</sup> for groups impacted by covid 19 and requests for equipment/SIMs from NHS/charities.
  - c) Requests to deliver SMS/targeted messaging and to supply network data.
  - d) Requests in respect of vulnerable customers.

### Information flow between industry, Government and other public bodies

3. Operators are receiving significant requests from the UK Governments, charities and particularly NHS Trusts to address specific issues around mobile connectivity, end user equipment and related matters.
4. To address the general inquiries, Mobile UK has established an incoming e-mail address: [covid19@mobileuk.org](mailto:covid19@mobileuk.org). MNOs are encouraged to refer public bodies with a significant jurisdiction (e.g. National, DAs, and Combined Authorities) to contact the MNOs through this e-mail in accordance with the processes set out in this document.
5. Any e-mails received here are recorded by Mobile UK and managed through to closure.
6. This process of information flow is proving effective and useful for both MNOs and the major public bodies with whom we interact. (In the first week of operation, 15 requests/information were handled in this way.)
7. For requests that come to industry from government and other public bodies, Mobile UK should continue to encourage central government to prioritise requests and to provide sufficient detail to operators to enable effective consideration.

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<sup>1</sup> This refers to the provision of a SIM card and/or related tariff for end user equipment, not network coverage

8. Mobile UK will get confirmed with DCMS any large-scale requests that come from public bodies, where it is not obvious that the request is official.
9. In order to deal with the priority areas a) Site access and b) NHS specific processes are being established.

## **Escalating problems related to site access (for essential maintenance and similar)**

10. As it becomes increasingly difficult to access base stations and other sites to carry out repairs and other functions essential for keeping customers connected, Mobile UK will establish a co-ordinated escalation process into national, devolved and combined authority governments to assist with barrier busting.
11. Barrier busting could cover a range of tasks (locating landowners, planning, wayleaves, road closures, health & safety etc.)
12. Working to a process and agreed list of essential works, agreed between the MNOs, Cornerstone and MBNL, Mobile UK will act as a 'front-door' e-mail address for the purposes of initiating the site access escalation process.
13. Mobile UK is establishing contacts with national, DA and Combined Authority digital teams for the purposes of escalation.
14. Mobile UK will establish political support for tackling problems that have a cross departmental aspect.
15. Any commercially sensitive information which needs to be shared amongst Mobile UK and the UK's mobile operators shall be limited to that which is strictly necessary for the performance of the activities described in this note. Where it is necessary for such information be shared, it shall be shared only in an aggregated format (to the extent that is possible) and only with those who need to see it (in most instances this should exclude staff making site visits).
16. MobileUK will obtain confirmation from mobile operators' competition lawyers prior to sharing commercially sensitive information of one mobile operator with another mobile operator.

## **Requests for specific support, e.g. mobile connectivity for groups impacted by Covid 19 and requests for equipment/SIMs from NHS/charities.**

17. Operators are receiving significant requests from the NHS to address specific issues around mobile connectivity, end user equipment and related matters. The mobile

industry wants to be able to meet as many requests for support as is feasible.

18. In order to respond to these requests in an orderly and efficient manner, Mobile UK will work to a process agreed between the MNOs:

- **Where requests for donations or similar charitable endeavours are made directly to an individual operator**, but where that operator is unable to satisfy the request following their internal triage process, they will directly inform the requesting organisation/individual and, where appropriate, pass these onto Mobile UK for consideration by the other operators. Mobile UK will contact named people within each of the operators on a bilateral basis, depending on the type of request (e.g. vulnerable people, support for home learning etc.) Each operator will then be able to assess unilaterally whether these requests can be supported and, if so, they will pick up directly with the requestor.
- **Where requests are made to Mobile UK** via the [covid19@mobileuk.org](mailto:covid19@mobileuk.org) or otherwise, Mobile UK will acknowledge receipt and ask the enquirer whether their organisation has an existing relationship with any operators. Once enquirer has established which one(s), they will inform Mobile UK and Mobile UK will pass the contact to the MNO in question.

19. It is not intended that any commercially sensitive information will be shared by the UK's mobile operators with Mobile UK but, to the extent that is, it shall be limited to that which is strictly necessary for the performance of the activities described above. Where it is necessary for such information be shared with the mobile operators, it shall be shared only in an aggregated format (to the extent that is possible) and only with those who need to see it. Any sharing of such information will be subject to prior review and sign-off by the competition lawyers of the relevant MNO(s).

20. Where an incoming inquiry cannot be dealt with in accordance with this process (say, for example, it is not possible to establish an existing relationship with an MNO), Mobile UK will refer to the MNOs' competition lawyers for advice on how to proceed.

21. Mobile UK will provide appropriate assistance to any accepted project where required (e.g. using its site escalation procedure to obtain any necessary access and permissions for equipment installation).

## **Requests to deliver SMS/targeted messaging**

22. Mobile UK has established a protocol and expert delivery group (with each MNO & [major MVNOs] represented) to advise and liaise with the Cabinet Office on requests for delivering public information text messages.

23. The first 'all nation' SMS was deemed a great success. It has been agreed with Cabinet Office that, unless there is an emergency, MNOs should be given at least 48 hours notice of an SMS request, and no more than once per week.
24. Cabinet Office requests for further messages will come in via the agreed protocol to the [covid19@mobileuk.org](mailto:covid19@mobileuk.org) e-mail address.

## **Requests to supply network data**

25. Network location data requests should be referred to the [covid19@mobileuk.org](mailto:covid19@mobileuk.org) email address. These will be handled in accordance with the data sharing framework and following the data privacy and competition law rules established with the Government for this purpose. MNO network data will not be combined by the MNOs to provide aggregate insights.

## **Requests in respect of vulnerable customers**

26. MNOs will continue to provide offerings and/or deal with matters relating to their own customers on a bilateral basis, as happened with recent announcements on 29<sup>th</sup> March and 10<sup>th</sup> April 2020.
27. Mobile UK will be used to communicate to the wider stakeholder community about how the industry is, in broad terms, providing assistance to vulnerable customers (e.g. recent mail out to all MPs, MSPs, MLAs and AMs).
28. Mobile UK will be used to liaise with Government and DAs, as appropriate and useful.

## Site Access

### **Essential working and escalation procedure during the Covid 19 Epidemic**

1. The UK's mobile operators are taking all practical measures to maintain and, where possible, improve the stability of the mobile networks by concentrating their available resources on tasks that are absolutely essential to supporting our critical national infrastructure, protecting vulnerable consumers and keeping the country connected, as people work from home and do their utmost to protect the most vulnerable in society.
2. All the mobile operators' employees and sub-contractors are following the strict NHS guidelines and only those who cannot work from home because of the nature of their work are working away from home.
3. **The following activities are deemed as essential**, in terms of supporting CNI, protecting the vulnerable and keeping the country connected:
  - Attending service affecting faults that impact on customer service, network availability.
  - Attending to capacity and resilience issues.
  - Attending service affecting faults that impact on the operations on other essential services.
  - Attending to site maintenance and repair, including support services such as refuelling generators
  - Progressing orders to support Critical National Infrastructure (including temporary sites such as civilian buildings adapted for healthcare)
  - Deploying essential core, mobile and broadband network capacity & resilience.
  - Supporting critical planned maintenance and compliance with legal requirements
  - Operating the network management centres
  - Operating customer support centres (but only where is not possible to do this from home)
  - Repairing end user equipment for vulnerable customers
  - Critical upgrades needed to maintain capacity and coverage

- Decommissioning of dangerous or unstable sites
    - Removing infrastructure that poses harm to the public. This can happen through road traffic accidents and severe storms. (Red)
    - Decommission Sites to meet a consent date if it cannot be moved. (Red) If Consent date can be relaxed this will go to Green.
  - Notice to Quit replacement sites
    - Building these sites can help with the increased demand with people due to Covid-19 (Red)
4. For the purposes of travel and access to sites, mobile operators' employees and subcontractors will carry a letter on the headed notepaper of their employer or operator or infrastructure provider confirming that the member of staff is carrying out an essential service and has the right to travel across the UK, including on public transport.
  5. When staff are visiting the premises of third parties, they observe all the rules of social distancing and, where appropriate, wear Personal Protective Equipment.

## Escalation

6. In the event that mobile operators' staff cannot travel around or gain access to sites, there is an escalation process in place for key sites and activities.

Where a mobile operator employee/JV/sub-contractor cannot get access to a site and has exhausted its own processes for obtaining access and/or needs to act more quickly than internal processes would allow, the following **escalation process** can be invoked:

Step 1: 1<sup>st</sup> pass triage by operator/JV – does the task/function fall within the activities set out in Section 3? If yes...

Step 2: send details in an email to [covid19@mobileuk.org](mailto:covid19@mobileuk.org) . The e-mail must identify the location, the problem, likely to route to resolution and any other information that might be relevant to achieving resolution.

Step 3: Mobile UK, in co-ordination with the escalator, will escalate to a relevant body, including obtaining support from political bodies to address the problem (UKG and devolved administrations, elected mayors).

Step 4: Manage to resolution, as required.

## Impact of close working between operators on essential working

7. In view of the exceptional circumstances facing the country, the UK's mobile operators, where it is deemed more efficient and effective, have decided to do work closely with each other to face the current challenges. All actions taken jointly will continue to take account of operators' obligations under competition law, as is set out

in the Mobile UK “Action plan for mobile operator close working during the Covid-19 Epidemic”.

8. Any information which needs to be shared amongst Mobile UK and the UK’s mobile operators shall be limited to that which is strictly necessary for the performance of the activities referred to in the Action plan. Where this is necessary, information will be shared only in an aggregated format (to the extent that is possible) and with those who need to see it (in most instances this should exclude staff making site visits).
9. MobileUK will obtain confirmation from mobile operators’ competition lawyers prior to sharing commercially sensitive information of one mobile operator with another mobile operator.

## **Delivery framework for communicating key health messages to MNO customers**

As an industry, we have confirmed that we want to do all that is practically possible to support health professionals, the NHS and the Government in tackling the Coronavirus. We thought it useful for the four mobile operators, BT, Telefonica, Three and Vodafone, to agree a framework under which we can support your request to communicate key public health information messages from government to UK citizens via mobile networks.

### **Overall Framework**

- With any messages to customers it will be clear that these are from HM Government
- HM Government to provide us with a clear request to send these messages to counter any negative feedback we get from a small minority of customers
- HM Government and MNOs to agree a clear timetable for messaging taking into account internal approval processes.
- All messages to be Government branded, not co-branded.
- Need to define customer – is this consumers or all customers including businesses and public sector. We are keen to ensure we communicate as widely as possible as this is technically easier and most beneficial.
- Messages to complement and mirror style of messages on other platforms, including social media.
- All messages to be GDPR compliant – although we don't expect this to be an issue. This is the MNOs' responsibility but we would expect a clear written indication from HMG that we aren't in breach of GDPR.
- All activity to be compliant with competition law and signed off by MNO legal teams. This is the MNOs' responsibility not DoH.
- All messaging requests to come through a single point of contact within HM Government.
- All outgoing SMS messages must follow appropriate security and legal protocols to minimise the risk of SMS being spoofed and customers being put at risk.
- Approaches using channels other than SMS are likely to vary between MNOs

### **Communications channels under review**

- SMS
- Social media channels (either direct broadcast or sharing/retweet)
- Customer-facing apps
- News and PR channels

### **Timing and content of messages (our assumption is this will be an ongoing process and not just a one off)**

- Establish a speedy process to clear and deliver public health (and potentially other) messages with all four MNOs and DoH directly involved. Largely via a SPOC process.

MNOs to review if the scope of these requests is expanded. Process also to enable feedback on any concerns/issues.

- Where possible map out when communications will be needed to be sent – although we understand this is a fluid situation.
- Messages to be impactful and suitable in length and tone for communication tool – largely here we mean SMS – so we would like to work with DoH to help frame key messages if necessary but for DoH to provide drafts. This means any SMS messages to be no more than 160 characters otherwise it will take double the amount of time to send a message.
- SMS to have appropriate HMG organisation in the header so it appears that it is coming direct from HMG (needs to be 3-11 non-numerical characters). We may need to consider messaging explaining that MNOs have been asked to send these SMS by Government.
- Mass SMS texting will have to be sent over up to a number of days due to the sheer number of messages to be sent. This means it is key to send a single message rather than a series on the same subject because multiple messages will take longer to send.
- There must be a clearly defined validity period for the SMS messages, probably no greater than 7 days. It is vital that we have absolute clarity on the Sender ID we need to create, as soon as possible. This will enable us to predict how long setting up the process will take. .
- All MNOs to aim to send SMS messages at the same time if possible but with an appropriate timetable for this to be delivered that allows flexibility per MNO – for example the message to be first sent within a 24hr period.
- All SMS messages will need to fit into existing plans/campaigns to communicate to customers. All MNOs will already have planned communications to customers that will still need to be sent and we can't send more than one SMS message at a time. Our individual customer campaigns are commercially sensitive and so can't be shared on a collective basis.
- Messages to be centred around driving traffic to Government advice, so Government needs to make sure the SMS messaging joins up to the advice/webpages we are directing to them to. Government will need to ensure any webpages can handle the uplift in traffic that coordinated SMS will drive.

## Framework for data sharing by MNOs in combatting the spread of COVID-19

As an industry, we have confirmed we want to support health professionals, the NHS and the Government in tackling the Coronavirus epidemic. It is important for the four mobile operators (“MNOs”), BT/EE, Telefonica, Three and Vodafone, and the parties involved to have a mutual understanding of the framework under which the MNOs can support requests, where technically possible and legally permissible, in order to develop and share anonymised and aggregated insights on population movement based on large anonymised and aggregated data sets.

### Overall Framework

#### Requests for Sharing

1. HM Government will provide a central point of contact through which Government departments, devolved administrations and other public bodies with a legitimate use for population data can make written data sharing requests (referred to as the “Requester”).
2. The Requester shall provide MNOs with a clear request for population movement data and identify the COVID-19 related purpose for using that data. The data request should be made to [covid19@mobileuk.org](mailto:covid19@mobileuk.org), from where it will be distributed to individual MNOs.
3. MNOs will respond to requests individually to the Requester. Mobile UK will not receive or provide any MNO data as part of this process.
4. The Requester shall, where relevant, notify its intended use to the Information Commissioner’s Office. HM Government shall provide MNOs with all reasonable assistance in responding to any communication from the ICO.
5. Data shared will only be used for the purpose of researching population movement to inform policies for containment and response planning in tackling the Coronavirus.
6. Data will only be shared with official public authorities for whom access to the data is relevant to informing policies for containment and response planning in tackling the Coronavirus. Data will only be shared for specific, relevant time periods and with a frequency that is operationally justifiable and reasonable.
7. Outputs and insights on population movement shall be anonymous and aggregated and developed based on large anonymised and aggregated data sets.
8. The Requester will not request and MNOs will not share any raw source data used to develop outputs and insights on population movement. MNOs will process the

requests for data on an individual operator basis and not mingle their raw data with that of other operators.

9. The Requester and / or the MNOs will not receive and / or share any of the raw data or any of the outputs resulting from processing the raw data with other MNOs. Mobile UK and The Requester will treat the data received from an individual MNO as strictly confidential.
10. It is intended that data sharing undertaken pursuant to this framework will involve anonymised, aggregated data. However, in limited circumstances a Requestor may, where it is relevant and proportionate for dealing with the Covid 19 epidemic, request personal data from an MNO, provided that prior to making such a request, the Requestor shall establish and agree in writing with the ICO, a relevant legal basis on which the relevant MNO can rely before sharing such personal data with the Requestor.
11. Requests for data must have due regard to proportionality, relevance, fairness and transparency, so that the use of MNOs' data is perceived by the public as reasonable in the circumstances and not an undue invasion of privacy.
12. HM Government will not prohibit MNOs from being transparent with their customers and the public by, for example, issuing any announcement, public statement or other communication to any third party in relation to any data sharing.

## **Terms of Sharing**

13. Data will only be shared subject to each MNO obtaining the relevant internal approvals, such as competition law, privacy, security and governance review and approval.
14. On receipt of a request, each MNO will aim to provide to the Requester an initial view of the technical and legal viability of the request they receive, including the timing and method of delivery, within 5 working days.
15. Data will only be shared subject to agreement between the MNO and the Requester confirming the terms on which data will be shared and the Requester's commitment to maintain data provided by any and each MNO as strictly confidential.
16. Data shared shall only be used for the purpose(s) specified at the time of sharing as defined in the relevant data sharing agreement. Any further uses or sharing of the data will not be covered by the terms agreed around the data sharing.
17. Data shared shall only be used for the duration and be subject to any data retention periods and deletion/destruction requirements specified in the relevant data sharing agreement. Each MNO may reassess the data sharing on a regular basis.

18. Data will not be shared without appropriate and reasonable security measures being applied. It is the responsibility of each party to negotiate appropriate measures to securely share any keys required to protect data.
19. The recipient of the data shared is responsible for ensuring that adequate security controls are in place to protect all files while stored, transferred or when shared with other authorised users. Restrictions must also be in place to ensure that only authorised users are able to access the data shared.
20. Before making any public announcements (such as issuing a press release), HM Government or any Requester that has been in receipt of shared data will give MNOs the opportunity to comment on the way the use of their data is portrayed.
21. Data shared shall not be passed on to any third party, including any Government body that has no involvement in the official policies and strategies for containment and response planning in tackling the Coronavirus and/or any other MNO, without the sharer MNO's permission.
22. There shall be no attempt, including linking or matching the data shared with any other data sets, to identify any individual. If the recipient of the data believes that any individual has been inadvertently identified, such identification must be immediately reported to the sharer MNO and the recipient must not record such identifiable data, share the identification with any third party, or attempt to contact the individual.