

**OFGEM - CONSUMER STANDARDS STATUTORY CONSULTATION – Response on behalf of Rethink Mental Illness - Mental Health and Money Advice Team**

**1. Improving Contact Ease**

- a. Improved access does not mean improved quality service to customers.
- b. If a client is vulnerable, then access to a 24hour service is just as important whatever their disconnection issue is and should be treated as such. This should also be clearly promoted.
- c. Being sensitive to customer needs- identifying vulnerability early and noting the client's individual requirements to support their needs. Taking the customer at their word i.e., domestic abuse issues and not requesting evidence
- d. Clients should be able to be contacted by letter or phone If requested.
- e. Triage customers so that they are identified as vulnerable and then provided with services that are appropriate to their requirements going forward.
- f. Remove barriers to access by accepting 3<sup>rd</sup> party authorities. A client/customer coming to a an agency for help is, by definition, vulnerable, and struggling to deal either with their debts or with dealing with creditors, so if there 3<sup>rd</sup> party representatives have presented their ATA then it should be accepted, not questioned. (We are a referral agency, so clients are referred to us by other advice agencies due to their mental health in this case. We are constantly being told to ask client to go back to Stepchange/National Debtline/Citizens Advice Bureau so they can deal with it, when we know they will just be referred back to us and so the cycle continues, clients continue to wait for solutions and get more frustrated).
- g. Enable a system where we can submit these authorities- often get lost in email system and then not uploaded in a timely fashion- increased time spent for advisers.
- h. Direct line to specialist help for all money advisers
- i. Expand the scope- The Priority Register has limited scope and doesn't really seem to be of any real benefit to a customer.

**Identification and support/advice for those struggling with their bills**

- a. To extend repayment rates based on clients' circumstances rather than supplier requirements
- b. Collections and arrears an obvious significant issue- need own in house debt advice service to ensure access to correct regulated advice. This can be sourced if necessary rather than just signposting.

- c. To instigate a trigger/red flag system that highlights if customer has exceeded average use for property size/number of people living there and support the client appropriately.
- d. Will enable supplier to be pro-active and investigate if there is a vulnerability issue- i.e. needs medical equipment or whether there is a supply metering issue.
- e. Duty to investigate.
- f. Make it an industry standard that all suppliers must have trust funds that are accessible to all.
- g. Increase cap on amount that can be awarded – in line with approx. level of household arrears.
- h. Trust funds available throughout the whole year
- i. Introduce use of social tariffs

### **Reputational incentives**

- a. Need to regain trust by providing a quality service and doing what suppliers say that they will do.
- b. Poor delivery from supplier advisers - notes not recorded and follow up calls wasting time requesting the same thing.
- c. Pausing scheduled repayments - reviewing a customer's ability to pay – set up scheduled repayments that reflect their ability to pay.
- d. Goodwill payments need to be addressed – do not reflect the problems. Financial penalties should reflect the complaint, up to and including the full amount of the arrears owed not just a goodwill gesture, particularly where the complaint is about non-compliance of an initial complaint.
- e. Transparency of outcomes/resolutions and what reported changes need to be implemented and when.
- f. Need more powers to enforce resolutions to ensure that changes have been made. Suppliers have no incentive to change without this enforcement.