*GDQ28. What are your views on our proposed position on the role of GDNs in relation to vulnerability, and how can they support a just transition to net zero?*

We support the proposed position in relation to vulnerability and are encouraged to see proposals that GDNs continue to play a role in supporting customers in vulnerable situations. As a VCMA partner organisation in Wales, we are working with WWU to deliver a programme of debt and welfare benefits advice to clients in housing need across Wales, directly addressing the impact of the current cost of living crisis and supporting our vulnerable clients to maximise their income and ensure rising household costs including energy costs and needs are managed as well as possible. The funding received through the VCMA programme has been invaluable and is directly enabling us to deliver hundreds of thousands of pounds in savings each year for our clients, transforming their quality of life – without this funding, there’s a risk that this service would no longer be able to continue. In this incredibly challenging economic climate, loss of this funding would be catastrophic for organisations like ours, leaving us at real risk of termination of services which would have a dire effect on the vulnerable people we support daily, the number of which continues to grow year on year due to the challenging economic climate.

Through VCMA Partnership working with third parties, GDNs are able to distribute key safety messaging to the general public which proves an incredibly efficient method of distributing this vital messaging – I would suggest it would be difficult to find a substitute method for this outreach activity without the VCMA programme and the related network of partnerships.

In relation to net zero – our concerns in this area are that there is inadequate support for households in Wales to make the necessary upgrades to their household infrastructure to reach the target. Whilst we agree that this is largely a government responsibility, where we can connect working towards net zero with supporting households to manage safety and minimise costs we feel there would be a role for GDNs and partner organisations to play here and would be keen to explore this further.

*GDQ29. What are your views on our proposal for GDNs to develop individual and joint-GDN vulnerability strategies?*

We support the proposals raised here and would welcome the opportunity to continue working with our VCMA partner (WWU) to develop their strategy in this area in the coming years. We also welcome the proposals in terms of developing a wider network of strategies and joint working to ensure we avoid a postcode lottery and provide support in a wide variety of locations – our experience is that this is underway and works well in practice, as demonstrated by WWU pursuing a partnership with Shelter in England to ensure they are reaching clients in housing need across the border in England in addition to in Wales, via us at Shelter Cymru.

*GDQ30. Do you agree with our proposal to retain the RIIO-GD2 vulnerability minimum standards is sufficient to ensure customers in vulnerable situations are protected and treated fairly?*

Yes, we support this proposal and would consider it vital that current standards are maintained as an absolute minimum, given the challenging climate for communities in Wales which will push more and more families into vulnerability over the years to come.

*GDQ31. What are your views on our proposal to retain the use of the VCMA UIOLI allowance, on the alternative option to incentivise vulnerability through an ODI-F, and on which activities to support vulnerability could be funded through baseline allowances?*

We would support the continued use of the VCMA UIOLI Allowance – the certainty offered by this model in the current funding landscape is greatly welcomed and has been of great benefit to us as a charity in the planning of our future service delivery. We have also greatly appreciated the collaborative approach between us and our GDN partner, and the potential to expand this collaboration across a network of other GDNs and VCMA project partners, which is a direct result of this approach.

We would be in support of delivering training to GDN staff to identify vulnerabilities and signpost to services as a component part of ongoing VCMA relationships and would be well placed to deliver and maintain this training, in respect of housing need in Wales.

*GDQ32. At what level should VCMA funding be set to ensure its effectiveness and sustainability, and what percentage should be ringfenced for collaborative projects?*

We would argue strongly for the level of VCMA funding to remain at as high a level as is possible to sustain – given the challenging funding landscape, a reduction in funding will in reality mean the termination of projects and services as alternative funding will not be easily sourced, especially by smaller organisations. This will have a greatly detrimental effect on the vulnerable clients who benefit from these projects and services, in these challenging times.

In terms of the collaborative projects allocation, we are broadly in support of this allocation but would not be in support of the allocation increasing – as this is more advantageous to larger organisations that span more than one GDN. As all of Wales is covered by one GDN, the collaborative projects allocation would only be available to us if we were to undergo a large project in partnership with another organisation, which would increase the complexity in terms of delivery and may be beyond our capacity.

*GDQ33. How should VCMA funding be allocated to ensure maximum impact for consumers in vulnerable situations?*

As vulnerability is difficult to assess across the board, we appreciate that the number of domestic gas customers has been the simplest measurement to follow in terms of distribution of funding and have no strong objections to this continuing - however we would argue that the most pressing current vulnerability is financial, due to the ongoing Cost of Living crisis. We would suggest that some sort of economic measure would be useful in making the calculation – poverty levels or similar could be a good indicator of the general level of economic vulnerability in a GDN’s service area.

*GDQ34. How can learnings from VCMA projects better inform the GDNs' organisational approaches to consumer vulnerability?*

There is great work going on in this area already and we’ve been very impressed by the collaborative approach demonstrated by our GDN Partner organisation. However there is of course room for development – VCMA partner organisations would be incredibly well placed to deliver training to GDN staff to support customer care and BAU activity and it would be great to have facility for this incorporated into the VCMA funding programme. It’s important to enable VCMA partners to have wider visibility across the GDN organisation in order to accomplish this, which will require focussed capacity from VCMA teams to deliver. We would also suggest the inclusion of lived experience as a key focus in developing this strand of work – in our specific case, we would be well placed to connect WWU with individuals with lived experience of housing need and homelessness to help develop their support mechanisms and knowledge in this area.