

Gas Network Vulnerability and Carbon Monoxide Initiatives (VCMI) Governance Document

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This document is the Gas Network Vulnerability and Carbon Monoxide Initiatives (VCMI) Governance Document (“VCMI Governance Document”) referred to in Special Condition 5.4 of the Gas Transporter Licence. The purpose of this document is to:

- set out the regulation, administration and governance of the VCMA;
- require the Gas Distribution Networks (GDNs) to develop and maintain individual and Joint GDN Consumer Vulnerability Strategies;
- obligate the GDNs to hold an annual showcase event and publish individual and Collaborative Annual Consumer Vulnerability Reports;
- require the GDNs to publish detailed reporting metrics for BAU vulnerability and CO safety activities; and
- require the GDNs to publish their performance against the PSR Customer Satisfaction ODI-R and PSR Customer Complaints ODI-R.

It is the responsibility of each Network Licensee to understand the provisions of this Governance Document and how those provisions apply to it. This version of the VCMI Governance Document comes into effect on 01 April 2026.

VCMI Governance Document change control log

Version	Date published	Summary of document
V1	26 February 2021	First version of VCMA Governance Document.
V1.1	20 July 2023	Draft with proposed changes to version V1 of VCMA Governance Document issued for consultation.
V2	31 October 2023	Updated VCMA Governance Document which is currently in force.
V2.1	06 January 2025	Change made to eligibility criteria for servicing, repairing and replacing essential gas appliances.
V3	02 February 2026	Draft with proposed RIIO-GD3 changes to the re-named VCMI Governance Document issued for consultation.
V3.1	01 April 2026	Updated governance document with appropriate changes recommended at consultation.

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1. Introduction

1.1 Supporting and protecting consumers in vulnerable situations continues to be a priority for Ofgem and the GDNs. In RIIO-GD3, we have:

- retained the Vulnerability and Carbon Monoxide (CO) Allowance (VCMA) use-it or lose-it allowance (“UIOLI”);
- funded business as usual (BAU) vulnerability and carbon monoxide safety activities through baseline allowances; and
- introduced reputational output delivery incentives (ODI-Rs) to report Priority Services Register (PSR) Customer Satisfaction and PSR Customer Complaints handling.

Vulnerability and Carbon Monoxide Allowance

1.2 The VCMA provides use-it or lose-it (UIOLI) funding for Gas Distribution Networks (GDNs) to utilise on VCMA Projects focused on vulnerability and CO initiatives that go beyond activities that are funded through other price control mechanisms, the GDNs’ baseline allowances, or are required through licence obligations.

1.3 The allowance is set at £165m in RIIO-GD3.¹ Of that £165m, a minimum of 25% is ring-fenced for GDN Collaborative VCMA Projects, while an additional minimum of 3% is ring-fenced for Cross-Utilities Collaborative VCMA Projects. The remaining 72% is split between each network based on the forecast number of GB domestic gas customers served in the first year of RIIO-GD3 and can be used to fund individual, GDN Collaborative VCMA Projects and Cross-Utilities Collaborative VCMA Projects.

1.4 Each network’s proportion of the total VCMA allowance is set out in its Gas Transporter Licence (Special Condition 5.4) and in Chapter 3 of this document.

¹ The RIIO-GD3 VCMA funding level, Company Specific Allowances, GDN Collaborative VCMA Project Allowances and Cross-Utilities Collaborative VCMA Project Allowances are set out in the RIIO-3 Final Determinations – GD Annex: <https://www.ofgem.gov.uk/sites/default/files/2025-12/RIIO-3-Final-Determinations-GD.pdf>

BAU Vulnerability and Carbon Monoxide Safety Activities

1.5 BAU vulnerability and CO safety activities are specific activities common to all GDNs which are funded through baseline allowances.² Funding these activities through baseline allowances provides confidence for longer-term planning, further embeds the activities into BAU, and enables the VCMA to be spent on initiatives which proactively respond to specific or emerging consumer needs. Funding for these activities was set through the RIIO-3 Final Determinations.

VCMI Governance Document

1.6 This document is the VCMI Governance Document.³ This document sets out:

- the eligibility criteria VCMA Projects must meet as specified in Special Condition 5.4;
- the regulation, administration, and governance of the VCMA (including the Terms of Reference for the National Steering Panel and Delivery Group);
- common and comparable reporting requirements for the GDNs' BAU vulnerability and CO safety activities;
- the requirements for the GDNs to maintain and update individual Consumer Vulnerability Strategies tailored to the needs of their consumers;
- the requirements for the GDNs to maintain and update a Joint GDN Consumer Vulnerability Strategy to facilitate knowledge-sharing, collaboration and progress on cross-sector challenges;
- the requirements for the GDNs to hold an annual showcase event to present their VCMA Projects and other key vulnerability metrics to stakeholders;
- the requirements for the GDNs to produce individual and collaborative outcomes-focused Annual Consumer Vulnerability Reports on their use of the

² The specific activities considered as business as usual and summary justifications are outlined in Appendix 1 of the RIIO-3 Final Determinations – GD Annex:

<https://www.ofgem.gov.uk/sites/default/files/2025-12/RIIO-3-Final-Determinations-GD.pdf>

³ This document was formerly known as the Vulnerability and Carbon Monoxide Allowance (VCMA) Governance Document in RIIO-GD2. In recognition of the broader scope of the document in RIIO-GD3, this document has been renamed as the Vulnerability and Carbon Monoxide Initiatives (VCMI) Governance Document.

VCMA and progress of VCMA projects, delivery of BAU vulnerability and CO safety activities, and delivery against their individual and Joint GDN Consumer Vulnerability Strategies;

- the requirements for the GDNs to capture and share learnings from VCMA projects and BAU vulnerability and CO safety activity with each other and wider stakeholders, where appropriate; and
- the requirements for the GDNs to fulfil their reporting obligations in relation to the Priority Services Register (PSR) Customer Satisfaction ODI-R and PSR Customer Complaints ODI-R.

1.7 In this document, we use the terms ‘Ofgem’ and ‘the Authority’ as well as the terms ‘we’, ‘us’ and ‘our’ interchangeably. Ofgem is the Office of the Gas and Electricity Markets. The Authority is the Gas and Electricity Markets Authority and is the governing body of Ofgem, consisting of non-executive and executive members.

Compliance

1.8 GDNs are required by Special Condition 5.4.7 of the GDNs’ Gas Transporter Licences to comply with this document.

1.9 This document in no way relieves affected parties, including GDNs and Project Partners, from their responsibility to ensure ongoing compliance with legislation including competition, data protection, environment and consumer protection laws.

Review

1.10 Ofgem may from time to time revise this VCMI Governance Document by direction in accordance with the process set out in Part B of Special Condition 5.4.

Context and related publications

1.11 The VCMI Governance Document facilitates the decisions made in the [RIIO-3 Final Determinations – GD Annex](#).

2. Vulnerability Strategies

Individual GDN Consumer Vulnerability Strategies

Requirements for GDNs

- 2.1 The GDNs are each required to maintain an outcomes-focused individual Consumer Vulnerability Strategy tailored to the needs of its consumers. Each GDN must ensure that its strategy is kept up-to-date and is aligned with evolving issues of, and approaches to, consumer vulnerability and CO safety and awareness. Where a GDN is responsible for more than one network area, this strategy should be developed at a network company level and address the needs of consumers in all its network areas.

What the strategy must contain

- 2.2 This strategy must be informed by and tested with diverse stakeholders, Project Partners and the GDN's Independent Stakeholder Group (ISG), and must be based on evidence from consumer research.
- 2.3 The strategy must inform the GDN's use of the VCMA, business as usual (BAU) vulnerability and CO safety activities, and wider GDN interactions with consumers in vulnerable situations.
- 2.4 The GDN must address how its strategy responds to the National Steering Panel's most recent National Vulnerability Priorities. The GDN must also address how its strategy will support and align with wider vulnerability and CO initiatives, or respond to identified gaps in provision, to maximise impactful outcomes for consumers in vulnerable situations. Wider vulnerability and CO initiatives include, but are not limited to:
- local, national and devolved government initiatives not otherwise funded through other price control mechanisms or government schemes (for example, GDN-

scope appropriate elements of relevant missions under the UK Government’s “Plan for Change”⁴);

- approaches and initiatives delivered by other utilities networks; and
- approaches and initiatives delivered by public bodies, consumer groups and charitable organisations.

Delivery and reporting of key updates

2.5 By 1 July 2027, the GDNs must apply a common and comparable structure for updates to their individual Consumer Vulnerability Strategy. This should include:

- an executive summary;
- an overview of learnings from the GDN’s delivery against its previous strategy;
- evidence of how the strategy will interact with the Joint GDN Consumer Vulnerability Strategy;
- evidence of how the strategy responds to the National Steering Panel’s most recent National Vulnerability Priorities at the time of publication;
- evidence of how the strategy aligns with and supports wider vulnerability and CO approaches or addresses gaps in provision;
- a spotlight on the key developments in the new strategy.

2.6 In advance of key updates to their strategies, the GDNs should review the common and comparable structure with their stakeholders and each other to ensure it remains fit for purpose. Each GDN can incorporate additional structural elements into their Consumer Vulnerability Strategy to ensure it remains tailored to the needs of their specific stakeholders. However, the GDNs must ensure that the core structure, metrics and commitments remain consistent and comparable across all GDNs.

⁴ Relevant missions include An NHS Fit for the Future, Making Britain a Clean Energy Superpower, and Break Down Barriers to Opportunity - <https://www.gov.uk/missions>

- 2.7 The GDN must make its most up-to-date individual strategy publicly available in an accessible format on their websites and inform key stakeholders when these strategies are updated. The GDNs are required to confirm in their annual Regulatory Reporting Packs (RRPs) that they have made their most up-to-date strategy available on their websites.

Joint GDN Consumer Vulnerability Strategy

Requirements for GDNs

- 2.8 The GDNs are required to collaboratively maintain a high-level, outcomes-focused Joint GDN Consumer Vulnerability Strategy tailored to the needs of their consumers. The strategy must be kept up-to-date and aligned with evolving issues of, and approaches to, consumer vulnerability and CO safety and awareness.

What the strategy must contain

- 2.9 This Joint GDN Consumer Vulnerability Strategy must be informed by and tested with diverse stakeholders, Project Partners, and Independent Stakeholder Groups (ISGs), and must be based on evidence from consumer research. It must inform the GDNs' use of the VCMA, business as usual (BAU) vulnerability and CO safety activities, and wider GDN interactions with consumers in vulnerable situations. It must also inform and respond to the GDNs' individual Consumer Vulnerability Strategies.
- 2.10 The Joint GDN Consumer Vulnerability Strategy must detail the GDNs' collaborative approaches to identifying, anticipating and responding to issues as they emerge. This should include evidence of approaches to knowledge sharing, opportunities for collaboration, efforts to avoid duplication, and a roadmap to facilitate progress on cross-sector challenges (including delivering a just transition⁵ to net zero, and the

⁵ According to the Joint GDN Consumer Vulnerability Strategy, a 'just transition' is defined as 'playing our role as a GDN to advocate to ensure no one, particularly those most at risk, is left behind or burdened as the UK transitions to cleaner energy, and to ensure everyone – regardless of where you live, social, or economic status – benefits equally from the transition to cleaner energy, and is aware of the choices they have available to them.'

use of data and digitalisation to identify and address vulnerability e.g. through the development of a multi-sector Priority Services Register (PSR)).

2.11 The GDNs must address how their Joint GDN Consumer Vulnerability Strategy has responded to the National Steering Panel’s most recent National Vulnerability Priorities, and evidence how it will contribute to the GDNs’ collective efforts to tackle these issues. The GDNs must also address how their Joint GDN Consumer Vulnerability Strategy will support and align with wider vulnerability and CO initiatives, or respond to identified gaps in provision, to maximise impactful outcomes for consumers in vulnerable situations. Wider vulnerability and CO initiatives include, but are not limited to:

- local, national and devolved government initiatives not otherwise funded through other price control mechanisms or government schemes (for example, GDN-scope appropriate elements of relevant missions under the UK Government’s “Plan for Change”⁶);
- approaches and initiatives delivered by other utilities networks; and
- approaches and initiatives delivered by public bodies, consumer groups and charitable organisations.

Delivery and reporting of key updates

2.12 By 1 July 2027, the structure of the Joint GDN Consumer Vulnerability Strategy must, where possible, align with that of the GDNs’ individual Consumer Vulnerability Strategies. This should include:

- an executive summary;
- an overview of learnings from the GDNs’ delivery against their previous strategy;⁷
- evidence of how the strategy responds to the National Steering Panel’s most recent National Vulnerability Priorities;

⁶ Relevant missions include An NHS Fit for the Future, Making Britain a Clean Energy Superpower, and Break Down Barriers to Opportunity - <https://www.gov.uk/missions>

⁷ For the first Joint GDN Consumer Vulnerability Strategy, this should include learnings from the GDNs’ RIIO-GD2 VCMA Steering Group strategy.

- evidence of how the strategy aligns with and supports wider vulnerability and CO approaches or addresses gaps in provision;
- evidence of efforts to avoid duplication and mitigate the risks of creating a postcode lottery for consumers;
- a framework to ensure the consistent and comparable outcomes-focused monitoring and reporting of strategy delivery;
- a framework to facilitate the timely capture, dissemination and implementation of learning; and
- a spotlight on the key developments in the new strategy.

2.13 The GDNs must make their most up-to-date Joint GDN Consumer Vulnerability Strategy publicly available in an accessible format on their websites and should inform key stakeholders when the strategy is updated. The GDNs are required to confirm in their annual Regulatory Reporting Packs (RRPs) that they have made their most up-to-date strategy available on their websites.

Delivery against Consumer Vulnerability Strategies

2.14 Each GDN is required to report on delivery progress against its individual Consumer Vulnerability Strategy in its individual Annual Consumer Vulnerability Report. The GDNs are required to report on collective delivery progress against the Joint GDN Consumer Vulnerability Strategy in their Collaborative Annual Consumer Vulnerability Report.

2.15 Both Annual Consumer Vulnerability Reports must include outcomes-focused reporting against strategy targets (including explanations where targets are missed), challenges to delivery, emerging issues and opportunities, and key learnings from the year. Further detail on the individual and collaborative Annual Consumer Vulnerability Reports is set out in Chapter 5..

3. VCMA Projects

- 3.1 The policy intent of the VCMA is to fund VCMA Projects aimed at supporting consumers in Vulnerable Situations, addressing issues related to CO and fuel poverty, and ensuring that those most at risk of being left behind are supported through a just transition to net zero.
- 3.2 Table 1 sets out each network company’s Company Specific VCMA Project capped allowance, GDN Collaborative VCMA Project ring-fenced allowance, Cross-Utilities VCMA Project ring-fenced allowance, and Total Network Company VCMA funding for RIIO-GD3.

Table 1: Total RIIO-GD3 VCMA funding by network company (£m, 2023/24) ⁸

Network Company	Company Specific VCMA Project capped allowance (£m)	GDN Collaborative VCMA Project ring-fenced allowance (£m)	Cross-Utilities Collaborative VCMA Project ring-fenced allowance (£m)	Total Network Company VCMA funding (£m)
<i>Cadent total</i>	58.93	20.46	2.46	81.85
EoE	21.70	7.53	0.90	30.13
Lon	12.20	4.24	0.51	16.95
NW	14.46	5.02	0.60	20.08
WM	10.57	3.67	0.44	14.69
NGN	13.78	4.78	0.57	19.13
<i>SGN total</i>	32.25	11.20	1.34	44.79
Sc	9.96	3.46	0.41	13.83
So	22.29	7.74	0.93	30.96
WWU	13.85	4.81	0.58	19.23
Total (£m)	118.80	41.25	4.95	165.00

⁸ Totals may not equal the sum of associated values due to the rounding of figures.

Project portfolio

- 3.3 There is no requirement for a GDN’s project portfolio to contain a specific percentage split between different types of VCMA Projects. However, the GDN must ensure that its portfolio of VCMA Projects covers a range of outcomes-focused activities and is not solely limited to either consumer vulnerability or CO initiatives.
- 3.4 GDNs are responsible for ensuring that their programmes of work are tailored to the needs of their consumers. The portfolio of VCMA Projects should align with the GDN’s individual and Joint GDN Consumer Vulnerability Strategies, and respond to the National Steering Panel’s most recent National Vulnerability Priorities. The portfolio should be developed through stakeholder engagement (including with relevant ISGs) and in conjunction with third party organisations to ensure efficient and effective delivery. All VCMA projects must have specific, measurable and time-bound outcomes, and be expressly linked to objectives in the GDN’s Consumer Vulnerability Strategies.
- 3.5 There is no minimum size for a VCMA Project. However, GDNs must ensure that collectively, VCMA Projects fall within their maximum allowed expenditure cap. The GDNs can supplement RIIO-GD3 VCMA funding through additional financial contributions (e.g. from a shareholder funded pot) or by jointly funding a VCMA project with a partner organisation (e.g. another utility network, such as a Distribution Network Operator).

Collaborative VCMA Projects

GDN Collaborative VCMA Projects

- 3.6 To encourage the sharing of learning and best practice across the GDNs, and to maximise the benefits of economies of scale, 25% of total VCMA funding is ring-fenced for GDN Collaborative VCMA Projects (including cross-sector GDN Collaborative VCMA Projects)⁹. This is a ring-fenced minimum and, where

⁹ A GDN Collaborative VCMA Project may be considered to be “cross-sector” where it involves at least one other partner organisation (e.g. NHS Trust(s)) which is not an energy or utilities network.

greater collaboration would benefit consumers in vulnerable situations, the GDNs should seek opportunities to exceed this.

- 3.7 GDN Collaborative VCMA Projects must involve at least two GDNs at a company level. Companies with more than one network must share GDN Collaborative VCMA Project learning across all their networks, as appropriate. Key project learnings must be proactively shared across all GDNs, including through the National Steering Panel and Delivery Group, and made available to project partners and wider stakeholders, where possible.
- 3.8 The share of the VCMA for GDN Collaborative VCMA Projects set out in Table 1 is for administrative purposes only. During a GDN Collaborative VCMA Project, a GDN can, as appropriate, transfer some, or all, of its share to other GDNs to fund the GDN Collaborative VCMA Project, providing there is a benefit to gas consumers on all the networks involved.¹⁰
- 3.9 The GDNs must decide collectively, including through their discussions as part of the Delivery Group, how the GDN Collaborative VCMA Project allowance should be spent. The GDNs must ensure that the GDN Collaborative VCMA is spent proportionally across the participating network regions.

Cross-Utilities Collaborative VCMA Projects

- 3.10 3% of total RIIO-GD3 VCMA funding is ring-fenced for Cross-Utilities Collaborative VCMA Projects which specifically support the development of cross-utility collaboration.
- 3.11 This ring-fenced funding is intended to foster collaboration between GDNs and other utilities (including those in energy, water, and telecommunication sectors) on shared priorities of consumer vulnerability. The GDNs must utilise this funding to strategically align and partner with other utilities networks to address shared priorities and support consumers in vulnerable situations.
- 3.12 Cross-Utilities Collaborative VCMA Projects must involve at least one GDN and one non-GDN utility network. Companies with more than one network must

¹⁰ Please note that a transfer in this context does not mean an adjustment to allowed revenues.

share GDN Collaborative VCMA Project learning across all their networks, as appropriate. Key project learnings must be proactively shared across all GDNs, including through the National Steering Panel and Delivery Group, and made available to project partners and wider stakeholders, where possible.

- 3.13 This is a ring-fenced minimum and, where greater collaboration would benefit consumers in vulnerable situations, the GDNs should seek opportunities to exceed this.

Eligibility Criteria

- 3.14 The eligibility criteria for company specific projects (other than condemned essential gas appliance repair and replacement) are set out below.

- 3.15 To qualify as a VCMA Project, a project must:

- a)
 - i. have a positive, or a forecasted positive, Social Return on Investment (SROI) calculated in accordance with a model which the GDNs have developed and submitted to Ofgem including for the gas consumers funding the VCMA Project, and
 - ii. have a positive, or a forecasted positive Net Present Value (NPV);
- b) either:
 - i. provide support to consumers in Vulnerable Situations and relate to Energy Safeguarding or customers living in fuel poverty, or
 - ii. provide support for those most at risk of being left behind in the transition to net zero, or
 - iii. provide awareness of, and education on, the dangers of CO beyond the activities funded as BAU through baseline allowances, or
 - iv. reduce the risk of harm caused by CO;
- c) have specific, measurable, and time-bound outcomes which align with relevant Consumer Vulnerability Strategy objectives to achieve the requirements set out in paragraph b;

- d) go beyond activities that are funded through other price control mechanism(s), including baseline allowance funding, or required through licence obligations;
- e) support or align with approaches to vulnerability taken by the wider energy industry, other utilities and/or consumer organisations, and local, national and devolved government, or evidence innovation or a gap in vulnerability support provision; and
- f) not be delivered through other external funding sources directly accessed by a GDN, including through other government (national, devolved or local) funding.¹¹

3.16 Where a GDN's business as usual (BAU) vulnerability and CO safety activities are funded through baseline allowances, these are not suitable for funding through the VCMA. The GDN is permitted to use VCMA funds to supplement or complement its BAU activities, however, it must ensure that its reporting provides sufficient evidence to prevent double funding.

Installation of energy efficiency measures

3.17 The installation of energy efficiency measures is not eligible as a VCMA Project.

3.18 For the avoidance of doubt, the provision of income, debt and energy efficiency advice is permitted, subject to it meeting the eligibility criteria set out in this document.

Eligibility criteria for company specific essential gas appliance servicing

3.19 To qualify as a VCMA Project, essential gas appliance¹² servicing must meet the following criteria:

- a) either:
 - i. a GDN has had to isolate and condemn an essential gas appliance following a supply interruption or as part of its emergency service role; or

¹¹ If part, but not full, funding is available through an external funding source for an eligible project, VCMA funding can be used for the remaining amount.

¹² Essential gas appliances are gas fuelled heating systems (including gas boilers and gas fires), and gas cookers.

- ii. a GDN or its Project Partner has identified an essential gas appliance which has not been serviced in the last 12 months in the owner-occupied home of a customer in a Vulnerable Situation where an occupier of the property suffers from a permanent or temporary health condition¹³ that makes them more vulnerable to health risks associated with cold homes; or
 - iii. a GDN or its Project Partner has identified an essential gas appliance which has not been serviced in the last 12 months in a tenant-occupied home of a customer in a Vulnerable Situation where it is the tenant's responsibility to maintain the essential gas appliance, where an occupier of the property suffers from a permanent or temporary health condition that makes them more vulnerable to health risks associated with cold homes; or
- b) the household cannot afford to service the essential gas appliance, as assessed against the affordability criteria set out in Appendix 1; and
 - c) sufficient funding is not available from other sources (including a social or private landlord and national, devolved, or local government funding) to fund the essential gas appliance servicing.

Eligibility criteria for company specific essential gas appliance repair and replacement

3.20 To qualify as a VCMA Project, unsafe pipework and essential gas appliance repair or replacement must meet the following criteria:

- a) either:
 - i. a GDN has had to isolate and condemn unsafe pipework or an essential gas appliance following a supply interruption or as part of its emergency service role; or
 - ii. A GDN or its Project Partner has had to condemn unsafe pipework, or an essential gas appliance, following an essential gas appliance service (as described in 3.19) and

¹³ These health conditions include cardiovascular conditions, respiratory conditions, mental health conditions, disabilities, older age (of State Pension age), and young children under the age of 5.

- b) either:
 - i. The occupier of the property suffers from a permanent or temporary health condition that makes them more vulnerable to health risks associated with cold homes and has a household income of £31,000 or below in 2025/26 prices, adjusted for inflation using Consumer Price Index with Housing costs (CPIH) ¹⁴, or
 - ii. the household cannot afford to repair or replace the essential gas appliance, as assessed against the affordability criteria set out in Appendix 1; and
- c) sufficient funding is not available from other sources (including national, devolved, or local government funding) to fund the unsafe pipework or the essential gas appliance repair or replacement.

Eligibility criteria for GDN Collaborative VCMA Projects

3.21 To qualify as a GDN Collaborative VCMA Project, a project must:

- a) meet the requirements set out in paragraphs 3.14 to 3.20;
- b) have the potential to benefit consumers on the participating networks; and
- c) involve two, or more, gas distribution companies.

Eligibility criteria for Cross-Utilities Collaborative VCMA Projects

3.22 To qualify as a Cross-Utilities Collaborative VCMA Project, a project must:

- a) meet the requirements set out in paragraphs 3.14 to 3.20;
- b) have the potential to benefit consumers on the participating networks; and
- c) involve one or more of the gas distribution companies in collaboration with one or more utilities networks from energy, water and telecoms.

Project Registration

3.23 Before starting a VCMA Project, the GDNs must ensure they meet the eligibility criteria and produce a Project Eligibility Assessment (PEA). In the PEA, GDNs must demonstrate that the VCMA Project meets the eligibility criteria set out in paragraphs 3.14 to 3.22 above. For GDN Collaborative VCMA Projects, and

¹⁴ The household income is based on the actual combined gross income of all adults in the household (before tax and deductions) at the time the criteria is applied. The GDNs should use the CPIH to annually adjust the £31,000 threshold to ensure it accounts for inflation.

Cross-Utilities Collaborative VCMA Projects with two or more GDNs, participating GDNs may choose to produce an individual or joint PEA.

- 3.24 If an individual VCMA Project expands into a GDN Collaborative VCMA Project or Cross-Utilities Collaborative VCMA Project, the GDN Collaborative VCMA Project or Cross-Utilities Collaborative VCMA Project must be registered as a new project by raising a new PEA.
- 3.25 The PEA must be signed by the senior person responsible for implementing VCMA Projects and published on the GDN's website or a central website shared by the GDNs. GDNs must notify Ofgem each time it registers a project by sending an email to vcma@ofgem.gov.uk.
- 3.26 The information a GDN must provide in the PEA is set out in Appendix 2.
- 3.27 GDNs must provide Ofgem with an updated PEA if material changes are made to the VCMA Project. The updated PEA must include rationale for the material change to the VCMA Project along with all relevant updates to it (e.g. costs, start/end date, objectives etc.).
- 3.28 GDNs must provide Ofgem with details of the total expenditure incurred in respect of all VCMA Projects, on a quarterly basis. The details tracker must be submitted for every quarter by 31 January, 30 April, 31 July and 31 October. For the avoidance of doubt this includes any work completed in accordance with paragraphs 3.19 and 3.20.
- 3.29 For a VCMA Project with a total VCMA funding requirement of over £1m, the GDN must provide Ofgem with the VCMA Project information 30 working days before the senior person responsible for implementing VCMA Projects signs off on the VCMA Project. The project information provided must be consistent with the requirements in Appendix 2 insofar as such information is reasonably available at the time. Ofgem may require a GDN to provide further information within 15 working days of having received the information. A GDN must provide the information required within 5 working days.
- 3.30 The registration process does not involve Ofgem approving VCMA Projects, and the VCMA Projects will be registered when the GDN publishes the PEA on its

website, or a central website shared by the GDNs. The GDN should ensure that all PEAs are published in an accessible format in line with Appendix 2. In the event that Ofgem finds that a registered VCMA Project does not meet the eligibility criteria or any other requirements set out in this document, we reserve the right to claw back the associated funding through the UIOLI mechanism.

Unspent allowances

- 3.31 In the event that the full VCMA is not spent by the end of RIIO-GD3, the unspent proportion of the allowance must be returned to customers via the mechanism set out in Special Condition 5.4 of the GDNs' Gas Transporter Licence. If unspent funding has been transferred as part of a GDN Collaborative VCMA Project, this must go back to the original GDN first.
- 3.32 In the event that any funding claimed for an eligible VCMA Project is not spent by the end of the project, the funding must be returned to the VCMA fund.

4. VCMA Governance Structure

National Steering Panel and Delivery Group

- 4.1 Proportionate and effective oversight of VCMA projects is critical to delivering impactful consumer outcomes on issues of consumer vulnerability and CO safety and awareness.
- 4.2 All VCMA projects, including GDN Collaborative VCMA Projects and Cross-Utilities Collaborative Projects, are subject to the annual reporting and regulatory reporting requirements set out in Chapter 5.
- 4.3 In addition, the National Steering Panel (NSP) and Delivery Group (DG) will act as collaborative VCMA governance forums to facilitate constructive challenge, expert guidance, and coordinated collaboration to maximise VCMA projects' consumer outcomes. Through these forums:
- the ISG-led NSP should act as a critical friend to drive strategic alignment and outcomes-focused collaboration; and
 - the GDN-led DG should support project co-design and proportionate monitoring and evaluation to maximise impact.
- 4.4 The NSP and DG are intended to support and improve:
- **Effective oversight** – provide proportionate oversight of GDN Collaborative VCMA Projects and Cross-Utilities Collaborative VCMA Projects to encourage and advise on the efficient, effective delivery of impactful consumer outcomes;
 - **Strategic alignment** – identify, encourage and facilitate opportunities for increased strategic alignment between the GDNs, other utility networks, and wider stakeholders (including cross-sector stakeholders) on issues of consumer vulnerability and CO safety and awareness, including through the Joint GDN Consumer Vulnerability Strategy;
 - **Coordinated collaboration** – advise, engage and develop strategic partnerships to lead and contribute to holistic approaches to addressing consumer vulnerability and CO safety and awareness priorities, enabling the VCMA's overall impact to be greater than the sum of its parts;

- **Insightful monitoring, evaluation and learning** – facilitate proportionate, consistent and comparable reporting and the timely application and dissemination of key learnings to improve VCMA project delivery; and
- **Constructive challenge and expert insight** – act as critical friends to identify thematic priorities, gaps in provision, risks and systemic issues; enable evidence-based and forward-looking discussions (including of strategic alignment, collaborative approaches, project design and delivery challenges, lessons learned, and collaborative approaches) and share informed guidance and advice.

4.5 Given the £165m of VCMA funding in RIIO-GD3, this governance structure ensures commensurate oversight of GDN Collaborative VCMA Projects (including cross-sector GDN Collaborative VCMA Projects), Cross-Utilities Collaborative Projects and BAU vulnerability and CO safety activities, while retaining the adaptability and responsiveness of the VCMA.

4.6 The NSP and DG do not have any decision-making, approval or assurance authority over the GDNs. Therefore, if a VCMA project meets the eligibility requirements set out in the VCMI Governance Document, the GDN will not be subject to any retrospective penalty or punitive action.

4.7 Furthermore, each GDN’s Independent Stakeholder Group (ISG) is expected to critically review its individual Annual Consumer Vulnerability Reports and hold its GDN accountable for the effective delivery of all its VCMA projects and Consumer Vulnerability Strategies.

4.8 The specific roles, remits and responsibilities of the NSP and DG are set out in their Terms of Reference in Appendix 3 and Appendix 4 respectively. For clarity, where responsibilities appear similar, the NSP leads on strategic direction and thematic oversight; the DG leads on operational coordination, implementation consistency, and detailed project support.

VCMA Governance Operating Framework

4.9 The NSP and DG are required to collaboratively develop and maintain an effective VCMA Governance Operating Framework tailored to their specific operating mechanisms, processes and common interactions. The VCMA

Governance Operating Framework should operationalise the governance structure outlined in the NSP and DG’s Terms of Reference, facilitating efficient and proportionate processes and minimising duplication of work.

4.10 To ensure the continued effective governance of VCMA projects, it is important that the VCMA Governance Operating Framework can be easily amended in response to dynamic changes in operational practices or processes. Therefore, the VCMA Governance Operating Framework is not set out in the VCMI Governance Document.

4.11 To assist the NSP and DG, we have set out key principles for the VCMA Governance Operating Framework in Table 2. This list is not intended to be comprehensive. The NSP and DG should collaboratively develop and agree the structure and content of the VCMA Governance Operating Framework.

Table 2: VCMA Governance Operating Framework Principles

Principle	Summary
Outcomes & public value	Outcomes-first governance focused on measurable benefits for consumers in vulnerable situations and CO safety.
Role clarity	NSP acts as a critical friend to inform strategic alignment and provide constructive challenge; DG coordinates delivery, outcomes-focused reporting, and learning. Project decisions remain with GDNs and Ofgem.
Proportionate, risk-based oversight	Oversight effort scales with project risk/size, targeting assurance where it is most needed. Adopt tiered monitoring and evaluation (e.g. based on Green Book proportionality principles); set risk triggers for deeper review; reuse templates and documents to reduce burden.
Evidence-led decision-making & data standards	Common data definitions and methods enable comparability and better decisions. Facilitate greater stakeholder understanding of SROI and other data tools.
Transparency, openness & accountability	Proactive publication of Minute or documents proportionate to their sensitivity, recognising consumer funding.
Ethical conduct & conflicts of interest	Develop an ethical culture (e.g. based on the Nolan Principles) and appropriately disclose and respond to conflicts of interest. Develop robust and transparent declarations of intent.
Inclusive stakeholder engagement & EDI	Engagement with grassroots partners and devolved nations, embedding equality, diversity and inclusion.

Principle	Summary
Learning, best practice & knowledge sharing	Learning treated as a system asset—captured, synthesised, shared and adopted.
GDN, Cross-Sector and wider stakeholder collaboration	Impactful collaboration to facilitate holistic and sustainable outcomes-focused approaches which address root causes.

5. Annual Consumer Vulnerability Reporting obligations

Annual Consumer Vulnerability Reports

- 5.1 Each GDN must produce an outcomes-focused Annual Consumer Vulnerability Report covering its use of the VCMA, the progress of its VCMA Projects, its individual delivery of BAU vulnerability and CO safety activities funded through baseline allowances, and delivery against its Consumer Vulnerability Strategies.
- 5.2 The GDNs must also collectively produce an outcomes-focused Collaborative Annual Consumer Vulnerability Report covering delivery of their GDN Collaborative VCMA Projects and Cross-Utilities Collaborative VCMA Projects, comparable BAU vulnerability and CO safety activity metrics, and delivery against the Joint GDN Consumer Vulnerability Strategy and the National Steering Panel's National Vulnerability Priorities.
- 5.3 We expect the Annual Consumer Vulnerability Reports to be concise and to specify where further details, including on VCMA Projects, can be found. Where possible, the GDNs must use a common, standardised reporting template and common terminology in their Annual Consumer Vulnerability Reports. The GDNs must send a copy of their Annual Consumer Vulnerability Reports to Ofgem and make both their individual and Collaborative Annual Consumer Vulnerability Reports available publicly on their website by 1 July each year.

VCMA Reporting Obligations

- 5.4 The GDN's individual Annual Consumer Vulnerability Report must include an overview of its VCMA use. This must outline how much of the VCMA has been spent, how much is remaining, a breakdown of VCMA Projects funded, an overview of how the GDN has engaged with its stakeholders on the use of the VCMA, a summary of the key project outcomes delivered, details of key lessons learned and improvements implemented, and progress against the GDN's Consumer Vulnerability Strategies.
- 5.5 The GDN must also report on its GDN Collaborative VCMA Projects and Cross-Utilities Collaborative VCMA projects through a Collaborative Annual

Consumer Vulnerability Report with the other GDNs, which complies with the requirements set out in this section.

5.6 In relation to the VCMA, the GDNs' individual and Collaborative Annual Consumer Vulnerability Reports must include as a minimum:

- **Overview of GDN's VCMA details:** This must include information on the current total spend level, most recent annual spend level, full 5-year allowance, actual and forecast spend, commitments and outcomes.
- **Individual and Joint-GDN Consumer Vulnerability Strategy progress:** This must describe the general progress against the GDN or GDNs' individual and Joint GDN Consumer Vulnerability Strategies. This must include key outcomes and link the VCMA Project covered by the Annual Consumer Vulnerability Report to the high-level group/themes set out in the GDN or GDNs' individual and Joint GDN Consumer Vulnerability strategies.
- **Project summary for the reporting year:** This must include a project summary table which details all VCMA Projects covered by the Annual Consumer Vulnerability Report, status, partners, high-level group/theme, SROI and spend. Links to the PEA documents published on the GDN or GDNs' website(s) and to the relevant VCMA Project section in the Annual Consumer Vulnerability Report (where applicable) must be provided.
- **Plan for the remaining years:** This must describe the GDN or GDNs' plan for VCMA Projects for the remaining years of RIIO-GD3 period.

5.7 The individual Annual Consumer Vulnerability report must also include, for each VCMA Project carried out in that Regulatory Year (unless otherwise stated):

- **Summary of VCMA Project progress:** This must describe the general progress of the VCMA Project against the interim milestones set out in the PEA, any notable outcomes or actions achieved in the relevant period, and any problems encountered. If a VCMA Project has been completed, this must be indicated clearly.

- **Funding update:** The GDN(s) must report on expenditure (incurred and expected).
- **Update on outcomes and associated actions:** This must describe the VCMA Project progress or delivery against specific, measurable and time-bound outcomes, associated actions and success criteria set out in the PEA, and outline any challenges the GDN or GDNs may face in achieving these.
- **Details on any learning and stakeholder engagement:** This must describe any project learning(s), how the learning(s) have been disseminated (if appropriate) and details of what stakeholder engagement on the VCMA Project has taken place where appropriate. The GDN or GDNs are also required to report on what changes have been implemented as a result of stakeholder feedback, and how learnings have been integrated into the GDN or GDNs' other VCMA projects and wider approaches to supporting consumers in vulnerable situations.
- **Targeting Vulnerability Support:** This must detail how the GDN or GDNs identified the vulnerability need being addressed through the VCMA project, outline why this issue was determined to be a priority for the GDN or GDNs' VCMA spending, and evidence how the VCMA project targeted its support effectively.
- **Remaining timescales:** This must outline how much time is remaining for the VCMA Project.
- **End of project SROI Evaluation for flagship projects:**¹⁵ This must assess the actual SROI of all flagship projects, with an explanation of any difference from the initial forecast SROI before the start of the project.

5.8 The GDNs should avoid unnecessary duplication across both Annual Consumer Vulnerability Reports. However, the GDN is able to report on its GDN Collaborative VCMA Projects and Cross-Utilities Collaborative VCMA projects through its individual Annual Consumer Vulnerability Report in addition to the

¹⁵ For the purposes of this document, "flagship GDN-specific VCMA projects" are defined as being of high value and/or strategically important VCMA projects, as agreed by the GDN(s) and their ISG(s).

Collaborative Annual Consumer Vulnerability Report, should it consider this beneficial for its own stakeholders.

BAU Vulnerability Reporting

5.9 The agreed common BAU activities funded through baseline allowances in RIIO-GD3 are shown in Table 3:

Table 3: RIIO-GD3 BAU vulnerability and CO safety activities funded through baseline allowances

Activity Area	Specific Activity
Campaigns and Education	Campaigns on PSR
Campaigns and Education	Education on PSR
Carbon Monoxide	Additional checks following CO reports / alarms
Carbon Monoxide	Annual CO awareness campaigns
Carbon Monoxide	CO education (schools and wider community)
Carbon Monoxide	Provision of CO / specialist alarms
Connections	Funded alterations for access to ECV / meter
Measurement and eligibility	Eligibility checks
Measurement and eligibility	Maintenance and development of SROI tools for BAU and VCMA evaluation
Memberships and accreditation	Memberships (including BS / ISO accreditation of inclusive services) and events
Personalised welfare	Including alternative heating, cooking, hot water, food and accommodation
Safeguarding services	Including locking cooker valves, easy assist ECVs, translations apps for engineers
Training	Internal training of customer facing employees
Vulnerable customer support	Dedicated teams to support customers during GDNs' works and triage of engineers' referrals for support

5.10 As part of its annual RRP, the GDN is required to report on the delivery of these BAU vulnerability and CO safety activities through the common and comparable metrics in Appendix 5.

5.11 The GDN must report on both the metrics in Appendix 5 and Appendix 6, alongside its Business Plan and Consumer Vulnerability Strategy targets and relevant delivery and outcomes commentary, in their individual Annual Consumer Vulnerability Report. Where possible, the GDNs should agree a common approach to calculating the reporting metrics.

Additional Reporting Requirements

5.12 The GDNs must also include the following in their Annual Consumer Vulnerability Reports:

- **Consumer Vulnerability Strategy progress:** This must provide an outcomes-focused summary of the GDN's delivery and progress against its Consumer Vulnerability Strategies. This should cover both VCMA and BAU vulnerability activities, and link activities to the high-level themes outlined in its Consumer Vulnerability Strategies.
- **Targeting Vulnerability Support:** This must detail how the GDN identified the vulnerability needs being addressed through VCMA and BAU vulnerability activities, outline why these areas were determined to be a priority under the GDN's Consumer Vulnerability Strategies and evidence how the GDN has targeted its support effectively.
- **PSR Customer Satisfaction ODI-R:** The GDN must report its customer satisfaction scores for customers on the Priority Services Register. These scores must be provided separately for each of the three survey areas (Planned Work, Unplanned/Emergency Work, Connections), in addition to a Combined PSR Customer Satisfaction score (an average of the scores for the three other categories). These scores must be accompanied by comparable scores for the GDN's general customer base and an accessible commentary to explain differences in satisfaction between the two groups. Starting from Year 1 of RIIO-GD3, the GDN must provide these scores for the most recent regulatory reporting years up to 5 years. This information must be provided for each Customer Satisfaction survey area irrespective of whether it is currently included in the Customer Satisfaction ODI-F.

- The GDNs will also be required to submit ODI-R data to Ofgem through their annual RRP. This will be collated and published as a league table in our Annual Reports.
- **PSR Complaints Metric ODI-R:** The GDN must report its complaints metric scores for customers on the Priority Services Register. These scores must be provided separately for each of the 4 metrics (complaints unresolved in one day, complaints unresolved in 31 days, repeat complaints, and the number of Energy Ombudsman decisions that go against the GDN (as a percentage of total complaints)) in addition to a Combined PSR Customer Complaints score (calculated using the same weightings as the Complaints Metric ODI-F). These scores must be accompanied by comparable scores for the GDN's general customer base and an accessible commentary to explain differences in satisfaction between the two groups. Starting from Year 1 of RIIO-GD3, the GDN must provide these scores for the most recent regulatory reporting year up to 5 years.
 - The GDNs will also be required to submit ODI-R data to Ofgem through their annual RRP. This will be collated and published as a league table in our Annual Reports.

6. Annual showcase event

- 6.1 The GDNs must collectively, with other GDNs, organise an annual showcase event. The event is for interested stakeholders including charities, local innovators, Project Partners and Ofgem. The GDN must highlight the key outcomes that have been achieved since the previous annual showcase event. It is also an opportunity for GDNs and stakeholders to showcase work and present ideas including, but not limited to, future projects to support consumers in Vulnerable Situations.
- 6.2 The annual showcase event must be a national event, hosted by a different network region each year. We also encourage GDNs to deliver smaller events for their regional stakeholders. The GDNs are required to collect and implement stakeholders' feedback each year to develop and improve the annual showcase event.
- 6.3 The GDNs must present on at least the following areas at the annual showcase event:
- a) progress, learnings and outcomes of VCMA Projects;
 - b) progress, learning and outcomes of BAU vulnerability and CO safety activities;
 - c) progress and delivery against individual and Joint GDN Consumer Vulnerability Strategies;
 - d) how they have supported Priority Services Register (PSR) needs in the previous year, including outlining the current:
 - i. PSR reach by needs code; and
 - ii. number and type of services provided to PSR customers;
 - e) progress on cross-sector vulnerability challenges (including supporting a just transition to net zero, and the development of a multi-sector Priority Services Register);
 - f) what they have done to improve CO safety and awareness; and
 - g) a summary of feedback received at the previous year's showcase event, and what changes have subsequently been implemented before the current year's event.

- 6.4 GDNs may use GDN Collaborative VCMA Project funding to cover the efficient cost to the Licensees' of organising the conference. They do not need to register a PEA for this but must report on spend through the Regulatory Reporting Pack¹⁶.
- 6.5 GDNs are responsible for the format of the annual conference. However, when organising the annual conference, the GDNs must engage with diverse stakeholders (including but not limited to Citizens Advice and the NEA) on the agenda, format and arrangements to ensure that the annual conference effectively shares best practice and learnings.
- 6.6 In consultation with stakeholders, the annual showcase event and the smaller events for regional stakeholders may be held online provided it serves the purposes set out in paragraphs 6.1 to 6.5.

¹⁶ The Regulatory Reporting Pack is a means by which Ofgem collects cost, volume, allowed expenditure and output delivery information from licensees to monitor performance against their RIIO-GD3 objectives, output and deliverables.

7. Glossary

Business Plan

means a plan of the sort that the licensee was invited to submit by paragraph 3.6 of the document titled ‘RIIO-3 Sector Specific Methodology Decision Overview document’, published by the Authority on 18 July 2024.

Company Specific VCMA Project

means a VCMA Project which is funded by one of the following: Cadent Gas Ltd, Northern Gas Networks Ltd, the SGN Group and Wales & West Utilities Ltd.

Cross-Utilities Collaborative VCMA Project

means a VCMA Project in which one or more of the Gas Distribution Networks (Cadent Gas Ltd, Northern Gas Networks Ltd, the SGN Group and Wales & West Utilities Ltd) collaborate with one or more other utilities across energy, water and telecoms.

Delivery Group

means the cross-GDN working forum which coordinates and supports the effective delivery of VCMA projects.

Energy Safeguarding

for the purposes of this document means a regulated function concerned with protecting the interests of current and future energy consumers – particularly consumers in, or at risk of entering, a vulnerable situation – by ensuring secure, reliable and affordable access to gas, and preventing unfair or harmful market practices.

GDN Collaborative VCMA Project

means a VCMA Project which is funded by more than one of the following: Cadent Gas Ltd, Northern Gas Networks Ltd, the SGN Group and Wales & West Utilities Ltd.

Joint GDN Consumer Vulnerability Strategy

means the strategy produced by the Gas Distribution Networks to address the needs of customers in vulnerable situations.

National Steering Panel

means the strategic advisory body responsible for programme-level oversight of collaborative projects, BAU reporting, and progress against vulnerability strategies.

National Vulnerability Priorities

means the strategic, thematic priority areas set by the National Steering Panel to guide Gas Distribution Networks in aligning their vulnerability strategies and VCMA activities.

Project Partners

means a third-party organisation that makes a contribution which is related to the success of the VCMA Project.

Priority Services Register

means the regulated register of customers who have additional communication, access or safety needs.

Regulatory Year

means a period of twelve months commencing on 1 April at 05:00 and ending on the following 1 April immediately before 05:00.

VCMA Projects

means projects that meet the eligibility criteria set out in the VCMA Governance Document.

VCMA Governance Operating Framework

means the agreed set of processes, mechanisms, and interactions that the NSP and DG develop and maintain to operationalise the VCMA governance structure.

Vulnerable Situations

has the meaning given to that term in Standard Special Condition A3 (Definitions and Interpretation).

Send us your feedback

We are keen to receive your feedback about this guidance. We would also like to get your answers to these questions:

- Do you have any comments about the quality of this guidance?
- Do you have any comments about its tone and content?
- Was it easy to read and understand? Or could it have been better written?
- Do you have any further comments?

Please send your feedback to stakeholders@ofgem.gov.uk.

Appendices

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Appendix 1 - Eligibility criteria for VCMA Projects – company specific gas appliance servicing or essential gas appliance repair and replacement

- A1.1 When assessing the eligibility of a customer in a Vulnerable Situation to receive VCMA funded essential gas appliance servicing or unsafe pipework and gas appliance repair and replacement, the GDN (or its VCMA delivery partner) must apply the criteria set out in paragraph A1.2 to determine the customer’s ability to afford essential gas appliance and unsafe pipework repairs, replacements, and servicing.
- A1.2 A household is eligible if they receive at least one of the following benefits and satisfies the relevant income requirements, where applicable:
- Income based Jobseekers Allowance
 - Income related Employment and Support Allowance
 - Income Support
 - Pension Credit Guarantee Credit
 - Working Tax Credit
 - Child Tax Credit
 - Universal Credit
 - Housing Benefit
 - Pension Credit Savings Credit
 - Child Benefit (subject to income caps and composition)
- A1.3 GDNs may either produce their own proforma or work together to produce a common proforma based on the criteria above in a format applicable to the VCMA.

Appendix 2 – Information required for the registration of VCMA Projects

Project title:

Funding GDN(s)

The GDN(s) which register(s) the project:

New or updated

State whether this is a new or updated PEA (indicate as appropriate by removing the option that does not apply)

New

Updated

Collaborative VCMA Projects

Specific role(s) of GDN(s) participating in a collaborative VCMA Project:

Date of PEA Submission

This needs to be the initial date of a first project submission.

Submission date:

Sectors involved

Please select all relevant sectors involved in the project:

- Distribution Network Operator
- Gas Distribution Network
- Consumer Group
- Charitable Organisation
- Local Authority
- Water Supplier
- Telecommunications Provider
- Other

If other is selected, please specify:

VCMA Project contact name, email and number

Name:

Email address:

Phone number:

Costs and funding

Total cost (£k):

Total VCMA funding required (£k):

BAU vulnerability and CO safety activity baseline allowance funding by activity (£k):

Problem(s)

This should outline the problem(s) which is/are being addressed by the VCMA Project:

Scope and Objectives

Outline the scope and objectives of the VCMA Project. This should be clearly defined including the benefits which would directly impact customers on the participating GDNs' network(s), and where the benefits of the VCMA Project lie.

Project Design Engagement

This must detail:

- **Targeting of vulnerability Support:** how the GDN(s) identified the vulnerability need being addressed through the VCMA project, including the use of consumer research, and data and technology.
- **Evidence of stakeholder and/or customer support:** information regarding all stakeholder and/or customer engagement which has contributed to the development of the VCMA Project.
- **Stakeholder project design input:** how stakeholders were actively involved in the project design, and how their input and feedback were incorporated to shape the project design. Where stakeholders and/or the GDN(s) disagree about the project design, justification must be provided for why the current project design is deemed preferable.

Why the Project is being funded through the VCMA

This should include an explanation of why the VCMA Project meets the VMCA eligibility criteria, and how it aligns with the GDN’s VCMA strategy.

How VCMA funding complements or supplements BAU vulnerability and CO safety activities funded through baseline allowances

Where the VCMA Project is being delivered alongside a BAU vulnerability and/or CO safety activity or activities funded through the GDN’s baseline allowance, the GDN must provide sufficient evidence that the VCMA Project complements or supplements the BAU activity or activities to prevent the risk of double funding.

For individual GDN VCMA Projects: Justification for why the project should not be collaborative

This should include evidenced reasoning as to why the VCMA Project cannot, or should not, be delivered in collaboration with other GDNs. For example, this could include the unique context within a network area, or the development of an innovative pilot project.

Outcomes, associated actions and success criteria

Details of the VCMA Project outcomes and the associated actions to achieve these, interim milestones and how the Funding Licensee will evaluate whether the project has been successful. Each action should have a proportion of the funding allocated.

Project Partners and third parties involved

Provide details of Project Partners or third-party involvement.

Potential for new learning

Provide details of what the GDN(s) expect(s) to learn and how the learning will be disseminated.

Aligning with and supporting wider vulnerability approaches

Details of how the project supports or aligns with approaches to vulnerability taken by the wider energy industry, other utilities and/or consumer organisations; local, national or devolved governments; or evidence innovation or a gap in vulnerability support provision. For example, this could include evidence of collaboration beyond the VCMA, non-VCMA joint funding of the initiative, or identified gaps in the provision of vulnerability services which the project seeks to address. The GDN(s) should show how the project fits within broader approaches to vulnerability.

Monitoring and Evaluation

Details of how the GDNs will work with their project partners to monitor the impact of the VCMA project and evaluate its effectiveness and success.

Scale of VCMA Project and SROI calculations, including NPV

Justify the scale of the VCMA Project – including the scale of the investment relative to its potential benefits. As part of this, the Funding Licensee (s) should provide the SROI calculation, including NPV. Note: The value in numbers of the SROI and NPV must be provided, rather than confirmation of positive impact.

VCMA Project start and end date

Provide details of start and end date of the VCMA Project and, where relevant, the VCMA Project that preceded this initiative.

Geographical area

Provide details of where the VCMA Project will take place. If the VCMA Project is collaborative, the Funding Licensee area(s) in which the project will take place should be identified.

Internal governance and project management evidence

Provide a description of GDN(s) review of proposal and project sign off, with details on how the project will be managed.

Appendix 3 – National Steering Panel Terms of Reference

Purpose

A3.1 The National Steering Panel (NSP) is a forward-looking strategic advisory body responsible for the programme-level oversight of:

- GDN Collaborative VCMA Projects (including cross-sector GDN Collaborative VCMA Projects)¹⁷;
- Cross-Utilities Collaborative VCMA Projects;
- Collaborative Annual Consumer Vulnerability Reports;
- Joint GDN Consumer Vulnerability Strategies; and
- the GDNs' BAU vulnerability and CO safety activity reporting metrics and delivery.

A3.2 The NSP's primary purposes are to:

- act as a critical friend, providing effective oversight, scrutiny and challenge of GDN Collaborative VCMA Projects and Cross-Utilities Collaborative VCMA Projects;
- support the improvement of projects by providing informed, evidence-based guidance on thematic priorities, gaps in provision, emerging risks, and systemic issues;
- ensure the GDNs deliver outcomes-focused reporting metrics;
- advocate for greater collaboration and strategic alignment (including cross-sector);
- ensure the capture, dissemination and implementation of project learnings.

A3.3 The NSP should inform and support regulatory confidence. The NSP does not replicate or replace the regulatory assurance and assessment processes set out in the main body of the VCMI Governance Document. Where possible, the NSP should leverage existing assessment and reporting mechanisms to avoid duplication, support proportionality, and enhance scrutiny of projects.

¹⁷ A GDN Collaborative VCMA Project may be considered to be "cross-sector" where it involves at least one other partner organisation which is not an energy or utilities network (eg. an NHS Trust).

Objectives

- A3.4 **Maximise VCMA impact through collaboration:** engage proactively with the Delivery Group (DG), the GDNs, cross-utility and cross-sector collaborators, project partners and wider stakeholders to ensure VCMA funding delivers measurable benefits through outcomes-focused projects and partnerships.
- A3.5 **Facilitate strategic collaboration:** identify, promote and facilitate strategic opportunities for cross-sector and cross-utility collaborations that support consumer vulnerability and CO safety outcomes.
- A3.6 **Provide proportionate oversight and constructive challenge:** review and offer constructive challenge on key documents and activities, including:
- the Joint GDN Consumer Vulnerability Strategy;
 - GDN Collaborative VCMA Projects (including cross-sector GDN Collaborative VCMA Projects);
 - Cross-Utilities Collaborative VCMA Projects;
 - Collaborative Annual Consumer Vulnerability Reports; and
 - BAU vulnerability and CO safety activity delivery and reporting metrics.
- A3.7 **Ensure standardised measurement, reporting and learning frameworks:** oversee the development and implementation of tiered, consistent and comparable outcomes-focussed measurement and reporting processes (including and in addition to SROI) to enable comparability, transparency, and the timely application of learning across GDNs.
- A3.8 **Advise the GDNs on national vulnerability and CO safety priorities:** Provide informed advice to GDNs on emerging and existing national priorities related to consumer vulnerability and CO safety.
- A3.9 **Advocate for strategic alignment:** Champion alignment between GDN activities and wider national, devolved and local approaches to addressing consumer vulnerability and CO, including government initiatives.
- A3.10 **Identify systemic challenges and facilitate solutions:** identify and analyse common delivery barriers under overarching cross-project and cross-network

themes, advise on options to overcome challenges, and support the proportionate escalation of themes, where necessary.

Scope and outputs

A3.11 The scope of the NSP defines the activities it will undertake to fulfil its purpose and objectives, and the limits of its remit.

A3.12 The NSP will:

- identify, set and publish evidence-based National Vulnerability Priorities in a Joint VCMA Vulnerability Priorities Statement at least every 2.5 years, and monitor progress against these priorities through an annual high-level summary report. The Statement must be informed by the NSP's expert insights and should recommend high-level outcomes-focussed themes and areas for development for GDN Collaborative VCMA Projects and Cross-Utilities Collaborative VCMA Projects. Both the Statement and progress summary report should be published on the GDNs' website and included in the GDNs' Collaborative Annual Consumer Vulnerability Report;
- provide constructive challenge on priorities, potential risks, systemic issues and collaborative opportunities in the Joint GDN Consumer Vulnerability Strategy. This includes promoting the GDNs' strategic alignment with broader funding landscapes and wider approaches to addressing issues of consumer vulnerability and CO safety, including initiatives of the NHS and UK, devolved and local government;
- steward the DG-led development and application of proportionate, standardised and comparable outcomes-focused reporting metrics for as part of a tiered approach to VCMA project monitoring based on financial value and/or strategic importance;
- ensure common data standards for BAU vulnerability and CO safety reporting metrics and monitor delivery progress against the GDNs' commitments;
- identify, promote and facilitate strategic opportunities for collaboration within and beyond the sector (including cross-sector) to address issues of vulnerability and CO safety;

- provide proportionate oversight of GDN Collaborative VCMA Projects (including cross-sector collaborations) and Cross-Utilities Collaborative VCMA Projects as set out in the ‘Collaborative Project Review’ section. NSP scrutiny is high-level and strategic, and detailed project review remains the responsibility of the DG unless the NSP explicitly invokes enhanced scrutiny¹⁸;
- oversee the dissemination and timely implementation of transferable lessons learned, and encourage insights to be shared with wider stakeholders, where possible;
- advocate for GDN Collaborative VCMA Projects and Cross-Utilities Collaborative VCMA Projects to align and avoid duplication with wider approaches (including cross-sector approaches) to addressing issues of consumer vulnerability and CO safety or address an identified gap in existing provision where the GDNs are best placed to act;
- advise the DG and GDNs on informed principles for effective project co-design and implementation;
- critically review the GDNs’ Collaborative Annual Consumer Vulnerability Report ahead of publication, and provide constructive feedback;
- in collaboration with the DG, develop and maintain an effective VCMA Governance Operating Framework tailored to their specific operating mechanisms, processes and common interactions. The NSP must submit a copy of the most up to date VCMA Governance Operating Framework to Ofgem; and
- engage with the DG in a timely and constructive manner to the benefit of the DG, NSP and VCMA projects, including through on-going and ad hoc communication, as necessary.

A3.13 The NSP will not:

- consider operational delivery, which resides with the DG, the GDNs and their project partners,

¹⁸ Enhanced scrutiny refers to a high-level review applied to projects. It involves deeper examination, critical review and oversight, with constructive challenge and expert advice provided where needed. Enhanced scrutiny ensures more rigorous, structured, and transparent governance.

- duplicate efforts undertaken by other bodies, including the DG (in so far as is possible) or the internal governance of ISGs and GDNs, and
- unduly inhibit the flexibility and responsiveness of VCMA projects.

Collaborative Project Review

A3.14 The NSP will provide proportionate and effective oversight of GDN Collaborative VCMA Projects (including cross-sector collaborations) and Cross-Utilities Collaborative VCMA Projects within its limited time, resource and capacity.

A3.15 The potential number of GDN Collaborative VCMA Projects and Cross-Utilities Collaborative VCMA Projects in RIIO-GD3 means that it is not feasible for the NSP to review each project in detail. Therefore, enhanced scrutiny by the NSP is reserved for strategic, high-value and/or high-risk projects where the NSP considers additional oversight could benefit consumer outcomes, project efficiencies, or cross-project learning and development.

A3.16 The process for identifying GDN Collaborative VCMA Projects and/or Cross-Utilities Collaborative VCMA projects for enhanced NSP oversight is as follows.

A3.17 No later than 12 weeks before each regular scheduled meeting of the NSP:

- In consultation with the NSP Chair and NSP Participants, NSP Members should collaboratively agree high-level thematic priorities for the meeting and/or any specific projects of interest.
- The NSP Chair should inform the DG of any high-level thematic priorities and/or any specific projects of interest.

A3.18 No later than 8 weeks before each regular scheduled meeting of the NSP:

- The DG should consider the high-level thematic priorities highlighted by the NSP Members and/or any specific projects considered to be of interest to the NSP.
- The DG should nominate four strategic, high-value and/or high-risk projects aligned with the NSP's thematic priorities that it considers would benefit most from enhanced NSP scrutiny. In determining which four projects to nominate, the DG should consider strategic priorities, emerging challenges and systemic issues, as

well as if/when the project was last subject to enhanced review by the NSP. Where the NSP has previously identified a specific project or projects of interest, these must be included as one or more of the four nominated projects.

- The DG should provide the NSP Chair with a 2-page overview of each of the four projects and the reasons for their nomination of these projects using a standardised template as agreed with the NSP.
- The NSP Chair should disseminate these papers to all NSP Members as soon as practicably possible.

A3.19 No later than 6 weeks before each regular scheduled meeting of the NSP:

- NSP Members, in consultation with the NSP Chair, should review the four project overview papers.
- Informed by their review of the nominated project papers, the NSP Members should collaboratively select between two and four projects in total for enhanced scrutiny at the meeting.
- The NSP Chair should inform the DG of the NSP Members' chosen projects for review.

A3.20 No later than 2 weeks before each regular scheduled meeting of the NSP:

- The DG should share with the NSP Chair the detailed project reports and presentations for each of the projects selected for enhanced scrutiny. Where appropriate, these should be tailored to focus on the discussion themes set by the NSP Members.
- The NSP Chair should share these documents with NSP Members, Participants and Stakeholders ahead of the meeting.

A3.21 Timelines may be adjusted through mutual agreement between the NSP and DG where proportionality and/or workload necessitate.

A3.22 It is for the NSP, in consultation with the DG, to determine how best to structure and facilitate discussions to maximise their benefit.

Authority and Decision Making

A3.23 The NSP is an advisory body with no approval or decision-making authority over the GDNs with regards to VCMA projects or delivery partners, and it should act as a critical friend. The NSP should issue recommendations and provide a steer on thematic prioritisation. It may request proportionate information from the GDNs to fulfil its duties.

A3.24 Should the NSP have concerns regarding progress towards thematic priorities, emerging risks, or systemic challenges, the following process should occur:

- it should provide the GDN(s) and/or DG with recommendations summarising the issues identified and action(s) advised;
- it should request that the GDN(s) shares an action plan outlining how it will address the identified issues; and
- ahead of the next NSP meeting, the GDN(s) should provide a progress report for review by the NSP.

A3.25 Should the NSP not be satisfied with the GDN(s)'s progress following this process, the NSP may recommend that the issue be considered by Ofgem.

A3.26 The NSP has the authority to call extraordinary meetings and, where sufficient notice has been given, require the GDNs to attend these meetings.

Membership and roles

Composition, Roles and Responsibilities

A3.27 The NSP is composed of an NSP Chair, Members, Participants and Stakeholders, with the GDNs also providing a Secretariat function. In fulfilling their responsibilities, the NSP Chair and all NSP Members, Participants and Stakeholders must act in good faith, ensuring fairness and transparency to maintain trust in the processes and procedures of the NSP.

NSP Chair

A3.28 The NSP Chair is tasked with effectively facilitating meetings of the NSP, acting as the lead contact for NSP Members, and ensuring continuity of leadership.

The NSP Chair is responsible and accountable for:

- effectively chairing and facilitating NSP meetings;
- overseeing the Secretariat function for the NSP (including setting agendas, drafting papers, producing Minutes, formalising actions, and providing follow-up where appropriate);
- overseeing the coordination and integration of the NSP's reporting and outputs (including the Joint VCMA Vulnerability Priorities Statement and the NSP's high-level annual summary statement in the GDN's Collaborative Annual Consumer Vulnerability Report)
- ensuring NSP Members, Participants and NSP Stakeholders are kept informed as appropriate;
- engaging with the NSP Members to decide meeting discussion themes and determine which GDN Collaborative VCMA Projects and Cross-Utilities Collaborative VCMA Projects would benefit most from enhanced scrutiny, constructive challenge or expert advice from the NSP; and
- ensuring the NSP fulfils its reporting criteria.

A3.29 The NSP Chair is appointed from and by the NSP Members on a rotational basis. It is for the NSP Members to determine the duration of the NSP Chair's tenure, recognising the administrative burden on individual NSP Members while ensuring consistency and continuity in NSP leadership.

A3.30 The NSP Chair does not have any additional authority to make recommendations on behalf of the NSP beyond the authority given to them as an NSP Member.

NSP Members:

A3.31 The membership of the NSP is composed of one representative from each of the four GDNs' ISGs. NSP Members should be chosen by their respective ISG

and should have good knowledge and understanding of the VCMA and issues of consumer vulnerability and CO safety. NSP Members should represent the views of their respective ISGs. Where possible, membership of the NSP should be kept consistent to ensure continuity. Where an NSP Member is unable to attend an NSP meeting, they can delegate attendance to another representative from their ISG in their absence. It is the responsibility of the NSP Member to ensure their delegate is suitably briefed ahead of the meeting.

A3.32 NSP Members are responsible and accountable for:

- sharing key learnings, insights and expert advice to benefit GDN Collaborative VCMA Project and Cross-Utilities Collaborative VCMA Project outcomes;
- requesting proportionate information from the DG, GDNs and project partners;
- engaging with the NSP Chair to decide meeting discussion themes and determine which GDN Collaborative VCMA Projects and Cross-Utilities Collaborative VCMA Projects would benefit most from enhanced scrutiny, constructive challenge or expert advice from the NSP;
- engaging with other member of their ISG to gather insight and guidance in advance of NSP meetings, and share outcomes following NSP meetings;
- ensuring the NSP fulfils the criteria outlined in the Purpose, Objectives, and Scope and Outputs sections above;
- maintaining an overview of VCMA governance activity across the DG, ISGs, collaborative VCMA forums, Annual Showcase event and other relevant engagements;
- identifying suitable participants with expertise across the UK, including the devolved nations, to attend meetings when appropriate; and
- ensuring the NSP fulfils its reporting criteria.

A3.33 Only NSP Members have the authority to make recommendations on behalf of the NSP.

A3.34 Where an ISG representative is also employed, or affiliated with, a charitable organisation or consumer group participating in the NSP, they must make a

formal declaration of intent and ensure that they act solely in an independent capacity, without promoting the views or agenda of their organisation.

NSP Participants:

A3.35 Up to two VCMA specialists from each network of the four GDNs, National Energy Action, Citizens Advice and Consumer Scotland should be invited to take part in the NSP as Participants.

A3.36 NSP Participants should have sufficient knowledge of the VCMA and, where possible, representatives from NSP Participant organisations should remain consistent to improve the efficiency and effectiveness of discussions. Charitable organisation and consumer group NSP Participants should take part in a consumer advocacy capacity. Where an NSP Participant is unable to attend an NSP meeting, they can delegate attendance to another VCMA specialist from their organisation in their absence.

A3.37 NSP Participants should:

- provide informed, evidence-based insights to help the NSP deliver its objectives;
- share feedback on relevant GDN Collaborative VCMA Projects, Cross-Utilities Collaborative VCMA project, the Joint GDN Consumer Vulnerability Strategy, or the Collaborative Annual Consumer Vulnerability Report;
- advise the NSP on issues of collaboration and strategic alignment;
- raise actual or potential strategic challenges;
- engage with other member of their organisation to gather insight and guidance in advance of NSP meetings, and share outcomes following NSP meetings;
- respond to proportionate requests for further information from NSP Members; and
- engage with the NSP Chair and NSP Members to propose discussion themes and propose GDN Collaborative VCMA Projects and Cross-Utilities Collaborative VCMA Projects which would benefit from enhanced scrutiny, constructive challenge, or expert advice from the NSP.

A3.38 GDN NSP Participants also have a responsibility to share relevant insights, challenges and learnings from individual and collaborative projects delivered

by grassroots partner organisations. GDN NSP Participants should ensure their GDN engages with, and collates, grassroots partner organisations' contributions in advance of NSP meetings. Where appropriate, GDN NSP Participants should also feedback the outcome of NSP discussions to grassroots stakeholders. The GDNs are responsible for ensuring they have appropriate internal mechanisms in place to capture relevant information. GDN NSP Members, alongside NSP Participants, are responsible for identifying suitable participants with expertise across the UK, including the devolved nations, to attend NSP meetings when appropriate.

- A3.39 Up to two Ofgem representatives should be invited to NSP meetings as observers. Their role is to represent Ofgem in discussions, advise the NSP on topics from a regulatory perspective, and feedback key NSP discussions to Ofgem to inform the development of future policy, practices, and procedures.
- A3.40 Participant numbers are limited to ensure that NSP discussions remain focused, efficient, and effectively managed. All stakeholders can provide feedback to the NSP through their engagement with ISGs and GDNs.
- A3.41 NSP participants do not have authority to make recommendations on behalf of the NSP.

NSP Stakeholders:

- A3.42 NSP Members should extend invitations to diverse stakeholder organisations and sector experts to attend their meetings at least once a year and keep them informed of relevant strategic decisions and developments. NSP Stakeholder groups include, but are not limited to, representatives from NHS trusts, UK/devolved/local government, DNOs and other utilities networks, Fire Services, academia, strategic partners, and grassroots organisations. The NSP is also able to engage with these stakeholders on a more regular basis where they interact with areas associated with their national vulnerability priorities. NSP Stakeholders should be encouraged to:

- share their expert knowledge and insights;

- advise the NSP on issues of collaboration and strategic alignment; and
- provide feedback on VCMA collaborations.

NSP Secretariat

A3.43 The NSP Secretariat should provide administrative and technical support to the NSP Members to assist with the coordination of meetings, reporting processes, and engagement with stakeholders. The NSP Secretariat function should be provided by the GDNs, and be funded through their baseline allowances.

A3.44 The NSP Secretariat should:

- as directed by, and in consultation with, the NSP Chair and NSP Members, facilitate the setting of NSP meeting agendas, draft papers and reports, produce Minutes, formalise actions, disseminate information and documents to stakeholders, and provide follow-up where appropriate;
- engage with the NSP Chair and NSP Members to coordinate and integrate the NSP's reporting and outputs (including the Joint VCMA Vulnerability Priorities Statement and the NSP's high-level annual summary statement in the GDN's Collaborative Annual Consumer Vulnerability Report); and
- act as the main point of contact for the NSP, and ensure that NSP Chair, Members, Participants and NSP Stakeholders are kept informed as appropriate.

Meetings

Frequency:

A3.45 The NSP should meet at least twice a year, either online or in person.

A3.46 NSP Members have the authority to convene additional sub-meetings or extraordinary meetings of the full NSP where they deem this necessary to fulfil the duties of the NSP.

Procedure:

A3.47 Meetings of the NSP should be held in two parts, Part A and Part B.

- A3.48 Part A should be an open discussion between all NSP Members, Participants and, when invited, Stakeholders. These discussions should facilitate candid, outcomes-focused scrutiny, constructive challenge and informed advice. All non-commercially sensitive and non-confidential NSP discussions should take place in Part A of the meeting to facilitate openness and transparency for all stakeholders.
- A3.49 These discussions should inform the NSP Members in making their recommendations.
- A3.50 Part B should be a closed discussion between all NSP Members, representatives of the four GDNs and Ofgem only. Part B discussions should only cover commercially sensitive or confidential issues which are not suitable for open discussion in Part A.
- A3.51 In providing their scrutiny, constructive challenge and expert advice, NSP Members should make use of both parts of the meeting, as appropriate.

Quorum:

- A3.52 For Part A, representatives from all NSP Members, at least one NSP Participant from each GDN, NSP Participants from at least two consumer organisations, and one observer from Ofgem must be present. For Part B, representatives from all NSP Members, all four GDNs and Ofgem must be present.

Agenda:

- A3.53 The NSP Chair, in collaboration with the NSP Members, should share an agenda and papers with the NSP Participants and Stakeholders no later than 10 working days ahead of the meeting.

Minutes

- A3.54 The NSP Chair should ensure all meetings of the NSP are minuted and the minutes are submitted to NSP Members for approval within 5 Working Days of the meeting. The finalised Minutes for Part A should be shared with NSP Members, Participants and all attendees within 10 working days of the meeting.

The finalised Minutes for Part B should be shared with NSP Members, all four GDNs and Ofgem within 10 working days of the meeting, with a redacted version of the Part B Minutes (with any project/commercially sensitive or confidential information removed) shared with other Participants and attendees also within 10 working days. To facilitate openness and transparency, the Minutes from Part A and redacted Minutes from Part B should be published on the GDNs' websites within 15 working days of the meeting. Redaction processes should follow a standardised template agreed with all GDNs and NSP Members.

Reporting

A3.55 The NSP Members, in collaboration with the NSP Chair, should publish a high-level (2-3 page) annual summary statement as a chapter in the GDNs' Collaborative Annual Consumer Vulnerability Report summarising:

- progress against the National Vulnerability Priorities;
- progress in strategic alignment and collaboration;
- key developments in common and comparable outcomes focused metrics;
- opportunities to increase the beneficial impact of the VCMA; and
- actual and potential strategic challenges.

A3.56 The NSP's annual summary statement should provide a high-level independent expert review of the points above, supplementing and complementing the remainder of the GDNs' Collaborative Annual Consumer Vulnerability Report, and providing a strategic overview in line with the NSP's role and responsibilities.

A3.57 The NSP's annual summary statement should also provide aggregate financial costs for the work of the NSP.

Funding and Remuneration

A3.58 In recognition of the time and expertise required to fulfil their NSP roles, the NSP Chair and NSP Members may receive reasonable remuneration, funded

through the GDN's VCMA allowances. Arrangements (including day-rates and any caps) should be determined by the GDNs in consultation with their ISGs, and confirmed in appointment letters. These arrangements should be reviewed periodically by the NSP for proportionality and value for money, and disclosed annually in aggregate as part of the NSP's annual summary statement.

- A3.59 All other aspects of the NSP, including GDN resourcing and NSP publications, must be funded through the GDNs' baseline allowances. This will ensure that the VCMA continues to be spent on projects which deliver impactful outcomes for consumer vulnerability and CO safety.

Conflict of interest management

- A3.60 The NSP Chair must maintain a Conflict of Interest Register for NSP Members, Participants and regular Stakeholders and ensure this is updated annually. In addition, all meeting attendees should declare any conflicts of interest in advance of their attendance and ensure they state this during the relevant meeting discussions.

- A3.61 NSP Members, Participants, and regular Stakeholders are required to complete a Declaration of Intent, setting out their intended role, purpose for attending, and basis of representation where applicable.

- A3.62 Should any NSP Member have an actual or perceived conflict of interest, they should recuse themselves from any strategic advice associated with this conflict.

Review and Amendment

- A3.63 The Terms of Reference for the NSP can be reviewed and amended in line with other aspects of the VCMI Governance Document, in line with the process set out in Special Condition 5.4 of the GDNs' Gas Transporter licences.

Appendix 4 – Delivery Group Terms of Reference

Purpose

A4.1 The Delivery Group (DG) is a cross-GDN working forum which coordinates and supports the effective delivery of VCMA projects, develops practical actions to address the National Steering Panel’s (NSP) National Vulnerability Priorities, and leads on project-level collaboration between GDNs, other utilities networks, project partners and wider cross-sector stakeholders.

A4.2 The DG’s remit covers all GDN Collaborative VCMA Projects (including cross-sector GDN Collaborative VCMA projects) and Cross-Utilities Collaborative VCMA Projects, common BAU vulnerability and CO safety activities and reporting metrics, and flagship GDN-specific VCMA projects.¹⁹

A4.3 The DG’s purpose is to:

- identify duplication and gaps in project service provision;
- consider and develop opportunities for outcomes-focused collaboration, including identifying suitable partners with which to co-design impactful projects;
- implement proportionate, tiered and common approaches to monitoring, evaluation, accountability and learning;
- provide support and governance through the awareness and co-ordination of activities; and
- curate shared learning to capture and disseminate project learning.

Objectives

A4.4 **Coordinate delivery of outcomes-focused Collaborative VCMA Projects:** consider and monitor the adherence of GDN Collaborative VCMA Projects (including cross-sector GDN Collaborative VCMA Projects) and Cross-Utilities Collaborative VCMA projects with the NSP’s National Vulnerability Priorities

¹⁹ For the purposes of this document, “flagship GDN-specific VCMA projects” are defined as being of high value and/or strategically important VCMA projects, as agreed by the GDN and its ISG.

and Joint GDN Consumer Vulnerability Strategy to improve strategic alignment and outcomes for consumers in vulnerable situations.

- A4.5 **Facilitate development of collaborative partnerships:** coordinate opportunities for strategically aligned collaboration between the GDNs, cross-utility partners, project partners and wider stakeholders, including developing Memorandums of Understanding (MoU) where appropriate, and raise and suggest changes to address vulnerability where appropriate to the GDNs' responsibilities.
- A4.6 **Provide advisory project review:** Periodically review and provide constructive feedback on the design, delivery, monitoring, outcomes and learning of all collaborative VCMA projects and flagship GDN-specific VCMA projects through regular learning and advice forums.
- A4.7 **Enable consistent and comparable reporting:** agree and implement proportionate, tiered monitoring, evaluation, accountability and learning for VCMA projects and BAU vulnerability and CO safety activities based on financial value and/or strategic importance, and support convergence of the SROI tool application and shared data standards.
- A4.8 **Centre learning and improvement:** collate, synthesise, analyse and disseminate VCMA project learning to maximise VCMA project outcomes and efficiencies.
- A4.9 **Identify systemic challenges and facilitate solutions:** identify and analyse common delivery barriers under overarching cross-project and cross-network themes, advise on options to overcome challenges, and support the proportionate escalation of themes, where necessary.

Scope and outputs

A4.10 The DG will:

- review the NSP's National Vulnerability Priorities in a timely manner and identify opportunities for alignment with these in the Joint GDN Consumer Vulnerability Strategy and Collaborative VCMA Projects;

- based on the outputs from the NSP, seek opportunities to strategically align with wider approaches to addressing issues of consumer vulnerability and CO safety, including UK, devolved and local government initiatives;
- based on the outputs from the NSP, identify needs, gaps, duplication in service provision and areas where VCMA collaborative projects can add value;
- coordinate the development and publication of the Joint GDN Consumer Vulnerability Strategy and Collaborative Annual Consumer Vulnerability Report, ensuring outcomes-focused reporting against strategic commitments and priorities;
- seek to identify appropriate delivery partners to co-design a service that addresses identified gaps in provision;
- develop an annual work plan to be reviewed at least once a year and a national calendar of activities to ensure effective support is in place;
- based on the outputs from the NSP, develop and coordinate pathways for effective future project co-design, planning and implementation;
- hold regular advice forums to periodically review and provide constructive peer feedback on GDN Collaborative VCMA Projects (including cross-sector GDN Collaborative VCMA Projects), Cross-Utilities Collaborative VCMA projects, and flagship GDN-specific VCMA projects. The GDNs can bring additional GDN-specific VCMA projects to this forum on an ad hoc basis for the timely sharing of challenges, learnings, or innovations;
- develop proportionate monitoring, evaluation, accountability and learning standards for VCMA projects and BAU vulnerability and CO safety activities (subject to the NSP's strategic oversight) to enable consistent and comparable reporting;
- support the convergence of monitoring and evaluation tools (including the consistent application of SROI tool) and shared data standards, including ensuring that the GDNs explain these methodologies clearly and accessibly to stakeholders;
- feedback input from project-level working groups on vulnerability and CO safety through updates to the NSP;
- collate and disseminate VCMA project learning in a timely manner with project partners and key stakeholders (where appropriate) and develop and maintain a

shared repository of key VCMA documents (such as PEAs, key performance indicators, outcomes and lessons learned, MoU, SROI tools, templates etc.);

- in collaboration with the NSP, develop and maintain an effective VCMA Governance Operating Framework tailored to their specific operating mechanisms, processes and common interactions; and
- engage with the NSP in a timely and constructive manner to the benefit of the NSP, DG and VCMA projects, including through on-going and ad hoc communication, as necessary.

A4.11 The DG will not:

- review operational delivery of GDN-specific non-flagship projects (including delivery partner selection and contractual decisions) which reside with the GDNs and their project partners, unless specifically requested by the GDN via the advice forum;
- conduct financial audits or assurance activities of VCMA projects;
- duplicate efforts undertaken by other bodies, including the NSP (in so far as is possible); and
- unduly inhibit the flexibility and responsiveness of VCMA projects.

Authority and Decision Making

A4.12 The DG is an advisory and coordinating body with no decision-making or auditing authority over the GDNs with regards to the approval of VCMA projects or delivery partners. The DG may make recommendations to GDNs; however, these are only advisory. It may request proportionate information from the GDNs and project partners to enable it to fulfil the duties outlined above in relation to all collaborative VCMA projects and BAU vulnerability and CO safety activities.

A4.13 Should the DG have concerns regarding one or more collaborative VCMA projects, the following process should occur:

- It should provide recommendations summarising the issues identified and action advised.

- Ahead of the next DG meeting or at another determined date, the relevant GDN(s) should share a progress update with the DG.
- Should the DG not be satisfied with the GDN(s)'s progress, the DG has the power to refer the issue(s) to the NSP for further review.

A4.14 The DG has the authority to call extraordinary meetings and, where sufficient notice has been given, require the GDNs to attend these meetings.

Membership and roles

Composition, Roles and Responsibilities

A4.15 The DG is composed of GDN Members, Non-GDN Members and additional stakeholders. In fulfilling their responsibilities, all DG Members and additional stakeholders must act in good faith, ensuring fairness and transparency to maintain trust in the processes and procedures of the DG.

DG GDN Members:

A4.16 The DG GDN Membership is comprised of up to two VCMA specialists from each of the four GDNs.

A4.17 GDN Members are responsible and accountable for:

- sharing insights, challenges, learning and opportunities from their own VCMA projects and any other relevant aspect of their regulated work, including through relevant metrics;
- acting as a critical friend to provide constructive challenge, informed insight and expert guidance on other GDNs' projects;
- coordinating and curating learning arising from service provision;
- leading the development and publication of the Joint GDN Consumer Vulnerability Strategy and associated reporting;
- ensuring the DG fulfils the criteria outlined in the Purpose, Objectives and Scope and outputs sections above;
- ensuring the DG fulfils its reporting criteria;
- requesting proportionate information from the GDNs and project partners; and

- raising concerns with the NSP, as appropriate.

A4.18 Representatives of each of the four GDNs should act as DG chair on a rotating basis. The GDNs are also responsible for providing the secretariat and administrative functions for all DG Members, including scheduling meetings, sharing agendas and actions, fulfilling reporting processes, and compiling meeting Minutes.

A4.19 DG GDN Members also have a responsibility to share relevant insights, challenges and learnings from individual and collaborative projects delivered by grassroots partner organisations. DG GDN Members should ensure they engage with, and collate, grassroots partner organisations' contributions in an on-going manner. Where appropriate, DG GDN Members should also feedback the outcome of DG discussions to grassroots stakeholders. The GDNs are responsible for ensuring they have appropriate internal mechanisms in place to capture relevant information.

A4.20 DG GDN Members must ensure a copy of the most up to date VCMA Governance Operating Framework is made available in an accessible format on their respective GDN's website.

DG Non-GDN Members:

A4.21 The Non-GDN Membership of the DG comprises up to two representatives from Citizens Advice and National Energy Action. Charitable organisation and consumer group Non-GDN DG Members should take part in the DG in an advice provision capacity.

A4.22 Non-GDN Members are responsible and accountable for:

- acting as a critical friend to provide constructive challenge, informed insight and expert guidance;
- ensuring the DG fulfils the criteria outlined in the Purpose, Objectives and Scope and outputs sections above;
- ensuring the DG fulfils its reporting criteria;
- requesting proportionate information from the GDNs and project partners; and

- raising concerns with the GDNs and/or NSP, as appropriate.

Additional stakeholders

- A4.23 The DG is able to invite additional stakeholders to participate in a DG meeting should this provide further insight to assist discussions, including subject-matter and/or delivery expertise. These stakeholders can include representatives from cross-utilities and cross-sector collaborators, project partners (including from grassroots organisation) and wider stakeholders (eg representatives from NHS Trusts).
- A4.24 A representative group of grassroots organisations from across the GDNs' project partners should be invited to participate in the DG annually. Grassroots organisations may also request attendance where their perspectives and insights would meaningfully inform the DG's discussion.

Meetings

Frequency:

- A4.25 The DG should meet approximately every six weeks, either online or in-person.
- A4.26 DG GDN Members have the authority to convene additional sub-meetings or extraordinary meetings of the full DG where they deem this necessary to fulfil the duties of the DG.

Procedure:

- A4.27 DG meetings focus on issues of project delivery and outcomes-focused collaboration, prioritising learning and improvement. Papers should be concise and, where possible, reuse existing documents and reporting templates to reduce the administrative burden.
- A4.28 The DG will convene regular learning and advice forums to provide a structured space for projects to share insights, troubleshoot delivery challenges, and exchange replicable best practice. The learning and advice forums should be time-restricted elements of the DG meeting. It is for DG Members to determine

and agree how best to structure these forums to ensure they provide an effective space for constructive challenge, learning and advice.

A4.29 DG Members should propose relevant projects for discussion at the learning and advice forum. DG Members should submit a brief request to the DG Chair, including a summary of the project issue or proposal, relevant learning or evidence, and the advice or feedback sought, no later than 15 working days before the meeting. The DG Chair should review these submissions and decide which projects should be prioritised in the meeting agenda. Any projects not included due to time constraints should be scheduled for the next available forum.

Quorum:

A4.30 The quorum is met when representatives from all four GDNs and at least two Non-GDN Members are present.

Agenda:

A4.31 As part of their secretariat function, the GDNs should share an agenda with all DG Members and Stakeholders no later than 5 working days ahead of the meeting.

Minutes

A4.32 The GDN acting as Chair should ensure the DG meeting is minuted, with Minutes shared with DG GDN Members and DG Non-GDN Members, and DG Stakeholders where appropriate, within 10 working days. DG Minutes should also be shared with the NSP Chair and NSP Members.

A4.33 Where actions have been assigned, these should be tracked to their closure.

Reporting

A4.34 DG GDN Members, with DG Chair and administrative support, should:

- share a high-level update at each NSP meeting (including progress against the NSP's National Vulnerability Priorities and the Joint GDN Consumer Vulnerability Strategy,

key strategic developments and systemic risks, emerging issues of consumer vulnerability and CO safety, delivery of BAU vulnerability and CO safety activities, opportunities for project replication and/or expansion, key developments in common and comparable outcomes focused metrics, and an overview of VCMA collaborative project lessons learned);

- respond in a timely manner to any requests made by the NSP for additional information;
- maintain a shared VCMA project registry and learning repository for use by GDNs, project partners, and other stakeholders (where appropriate) while ensuring confidentiality and data-sharing rules are respected;
- provide input into the Collaborative Annual Consumer Vulnerability Report; and
- host the annual showcase event to demonstrate and share the benefits of collaboration.

Funding

A4.35 All aspects of the DG, including the DG secretariat function, must be funded through the GDNs' baseline allowances.

Conflict of interest management

A4.36 The DG must maintain a Conflict of Interest Register for all DG Members and ensure this is updated annually. In addition, all meeting attendees should ensure they state any conflict of interest during the relevant meeting discussions.

A4.37 All DG Members are required to complete a Declaration of Intent, setting out their intended role, purpose for attending, and basis of representation where applicable.

Review and Amendment

A4.38 The Terms of Reference for the DG can be reviewed and amended in line with other aspects of the VCMI Governance Document, in line with the process set out in Special Condition 5.4 of the GDNs' Gas Transporter licences.

Appendix 5 – BAU vulnerability and CO safety activity reporting metrics for annual Regulatory Reporting Packs

- A5.1 The BAU vulnerability and CO safety activity reporting metrics in Table 4 below must be submitted to Ofgem as part of the GDN’s annual Regulatory Reporting Pack. The GDN must also complete these metrics using the commitments outlined in its RIIO-GD3 Business Plan and BPDT 8.24 to ensure it is held accountable for the delivery of these activities funded through its baseline allowance.
- A5.2 The reporting metrics in Table 4, for both the GDN’s actual delivery and RIIO-GD-3 commitments, should also be published as part of the GDN’s individual Annual Consumer Vulnerability Report. The reporting metrics listed in Table 4 are still to be finalised as part of the development of the RIIO-GD3 Regulatory Reporting Packs.

Table 4: BAU vulnerability and CO safety metrics for annual RRPs

Activity Area	Specific Activity	Reporting Metric	Measure	Unit
Campaigns and Education	Campaigns on PSR; Education on PSR	Total cost of all BAU Campaigns on PSR and Education on PSR activities	Cost	£m
Campaigns and Education	Campaigns on PSR	Total number of domestic households registered on the PSR	Volume	Number of households
Campaigns and Education	Campaigns on PSR	Total cost of PSR campaigns	Cost	£m
Carbon Monoxide	Additional checks following CO Reports / alarms; Annual CO	Total cost of all BAU carbon monoxide (CO) activities	Cost	£m

Activity Area	Specific Activity	Reporting Metric	Measure	Unit
	awareness campaigns; CO education (schools and wider community; Provision of CO / specialist alarms			
Carbon Monoxide	Additional checks following CO Reports / alarms	Total number of CMDDA1 investigations carried out	Volume	Number of investigations undertaken
Carbon Monoxide	Additional checks following CO Reports / alarms	Total cost of CMDDA1 investigations carried out	Cost	£m
Carbon Monoxide	Annual CO awareness campaigns	Total number of people reached during campaign per annum (no retention rate applied)	Volume	Number of people
Carbon Monoxide	Annual CO awareness campaigns	Number of people likely to take action (with retention rates applied)	Volume	Number of people
Carbon Monoxide	Annual CO awareness campaigns	Total cost of annual CO awareness campaigns	Cost	£m

Activity Area	Specific Activity	Reporting Metric	Measure	Unit
Connections	Funded alteration for access to the Emergency Control Valve (ECV) and/or meter	Number of free of charge alterations delivered	Volume	Number of alterations
Connections	Funded alteration for access to the Emergency Control Valve (ECV) and/or meter	Total cost of all BAU free of charge alterations delivered	Cost	£m
Measurement and eligibility	Eligibility checks; Maintenance and development of SROI tools for BAU and VCMA evaluation	Total cost of all BAU measurement and eligibility activities	Cost	£m
Measurement and eligibility	Eligibility checks	Cost of eligibility checks, per annum	Cost	£m
Membership and accreditation	Membership (including British Standards/ International Organisation for Standardisation accreditation of inclusive	Cost of memberships and accreditations	Cost	£m

Activity Area	Specific Activity	Reporting Metric	Measure	Unit
	services) and events			
Personalised welfare	Including alternative heating, cooking, hot water, food and accommodation	Total cost of all BAU personalised welfare activities	Cost	£m
Safeguarding services	Including locking cooker valves, easy assist ECVs, translation apps for engineers	Total cost of all BAU safeguarding services	Cost	£m
Training	Internal training of customer facing employees	Total cost of all BAU internal training of customer facing employees	Cost	£m
Vulnerable customer support	Dedicated teams to support customers during works and triage of engineers' referrals for support	Total cost of all BAU dedicated teams to support customers during works and triage of engineers' referrals for support	Cost	£m

Appendix 6 – BAU vulnerability and CO safety activity reporting metrics for individual Annual Consumer Vulnerability Reports

A6.1 The BAU vulnerability and CO safety activity reporting metrics in Table 5 below must be published as part of the GDN’s Annual Consumer Vulnerability Report. The GDN must also complete these metrics using the commitments outlined in its RIIO-GD3 Business Plan and BPDT 8.24 and publish them in its individual Annual Consumer Vulnerability Report to ensure it is held accountable for the delivery of these activities funded through its baseline allowance.

Table 5: BAU vulnerability and CO safety metrics for individual Annual Consumer Vulnerability Reports

Activity Area	Specific Activity	Reporting Metric	Measure	Unit
Campaigns and Education	Campaigns on PSR	Total number of people directly reached during PSR campaigns (no retention rate applied)	Volume	Number of people
Campaigns and Education	Campaigns on PSR	Number of people likely to take a PSR action (with retention rates applied)	Volume	Number of people
Campaigns and education	Education on PSR	Total number of people directly educated through PSR education activities (including	Volume	Number of people

Activity Area	Specific Activity	Reporting Metric	Measure	Unit
		via one-to-one conversations and group sessions)		
Campaigns and education	Education on PSR	Total cost of PSR education activities (including via one-to-one conversations and group sessions)	Cost	£m
Campaigns and Education	Education on PSR	Total number of people educated through PSR materials (including leaflets)	Volume	Number of people
Campaigns and education	Education on PSR	Total cost of PSR education materials (including leaflets)	Cost	£m
Carbon Monoxide	Additional checks following CO Reports / alarms	Number of CMDDA1 investigations which detected CO	Volume	Number of investigations which detected CO
Carbon Monoxide	Additional checks following CO Reports / alarms	Number of CMDDA1 investigations which detected CO by appliance type	Volume	Number of investigations which detected CO by appliance type

Activity Area	Specific Activity	Reporting Metric	Measure	Unit
Carbon Monoxide	CO education (schools and wider community)	Total number of people educated through initiatives (via one-to-one conversations, group sessions)	Volume	Number of people
Carbon Monoxide	CO education (schools and wider community)	Total cost of CO education (schools and wider community initiatives)	Cost	£m
Carbon Monoxide	CO education (schools and wider community)	Average consumer CO awareness score via a common survey	Score out of 10	Score out of 10
Carbon Monoxide	Provision of CO/specialist alarms	Number of CO alarms issued per annum (excluding specialist alarms)	Volume	Number of alarms
Carbon Monoxide	Provision of CO/specialist alarms	Total cost of CO alarms (excluding specialist alarms) per annum	Cost	£m

Activity Area	Specific Activity	Reporting Metric	Measure	Unit
Carbon Monoxide	Provision of CO/specialist alarms	Number of specialist CO alarms issued per annum (e.g. alarms for people with hearing-impairments)	Volume	Number of alarms
Carbon Monoxide	Provision of CO/specialist alarms	Total cost of specialist CO alarms (e.g. alarms for people with hearing-impairments) per annum	Cost	£m
Measurement and eligibility	Eligibility checks	Number of eligibility checks undertaken	Volume	Number of eligibility checks
Measurement and eligibility	Eligibility checks	Number of successful eligibility checks	Volume	Number of successful eligibility checks
Measurement and eligibility	Eligibility checks	Number of unsuccessful eligibility checks	Volume	Number of unsuccessful eligibility checks

Activity Area	Specific Activity	Reporting Metric	Measure	Unit
Measurement and eligibility	Maintenance and development of Social Return on Investment (SROI) Tools	Details of the maintenance and development of SROI tools and their benefits to consumers	Commentary	N/A
Measurement and eligibility	Maintenance and development of Social Return on Investment (SROI) Tools	Total cost of maintaining and developing SROI Tools, per annum	Cost	£m
Membership and accreditation	Membership (including British Standards/ International Organisation for Standardisation accreditation of inclusive services) and events	List of memberships and accreditations	Commentary	N/A

Activity Area	Specific Activity	Reporting Metric	Measure	Unit
Personalised welfare	Including alternative heating, cooking, hot water, food and accommodation	Number of households supported through personalised welfare activities	Volume	Number of households
Safeguarding services	Including locking cooker valves, easy assist ECVs, translation apps for engineers	Number of locking cooker valves installed	Volume	Number of locking cooker valves
Safeguarding services	Including locking cooker valves, easy assist ECVs, translation apps for engineers	Number of EasyAssist Emergency Control Valves installed	Volume	Number of EasyAssist Emergency Control Valves
Safeguarding services	Including locking cooker valves, easy assist ECVs, translation apps for engineers	List of applications used by engineers	Commentary	N/A

Activity Area	Specific Activity	Reporting Metric	Measure	Unit
Training	Internal training of customer facing employees	Number of customer facing employees trained	Volume	Number of customer facing employees
Training	Internal training of customer facing employees	Number of hours of training received by customer facing employees	Volume	Number of hours
Vulnerable customer support	Dedicated teams to support customers during works and triage of engineers' referrals for support	Number of dedicated employees supporting customers during works and triage of engineers' referrals for support	Volume	Number of dedicated employees
Vulnerable customer support	Dedicated teams to support customers during work and triage of engineers' referrals for support	Details of support provided to customers during works and triage of engineers' referrals for support	Commentary	N/A