

**Citizen Advice Scotland**  
**Disconnection to vulnerable customers' response**

I write in response to the consultation on the ERA's proposals to prevent the disconnection of vulnerable customers. Whilst we welcome the acknowledgement that the disconnection of vulnerable consumers is an issue that needs to be addressed, we are concerned that the proposals outlined will not offer sufficient protection. In particular, we are concerned that the definition of vulnerable is restricted to the customer and not the consumer.

This excludes households with vulnerable members who are not the bill payer, for example households with children, chronically sick, disabled or elderly members. Whilst they are not the bill payer, disconnection would have a detrimental impact on these vulnerable household members. Similarly, the addition of an 'at risk' qualification is a further obstacle to offering protection. Vulnerability should be in and of itself an indication of being at risk.

Finally, the exclusion of consumers on low income is of particular concern. Recent research published by Citizens Advice Scotland showed that half of all CAB debt clients had a monthly income of less than £800, and owed an average of £13,380 to five different creditors. One in ten reported being threatened with disconnection. Threatening disconnection in these instances forces debtors to prioritise creditors, leading to unsustainable repayment offers. Affordable repayment plans, based on the clients total indebtedness is a much more effective way of ensuring repayment.

We would like to see the industry adopt an end to all disconnections, as our case evidence indicates that actual disconnection always occurs in vulnerable households. The 'won't pay' may wait until the final threat before paying their bill, but the 'can't pay' are those who receive the punitive measure of actual disconnection. An end to disconnections would protect vulnerable customers and encourage the industry to examine more efficient and effective means of encouraging bill payment. We would be happy to discuss our concerns in more detail if this is helpful, but we would urge the ERA to reconsider its proposals and ensure that the policy will actually afford protection from disconnection for those who are actually vulnerable. Yours sincerely

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