



# Faculty of Public Health

of the Royal Colleges of Physicians of the United Kingdom

Working to improve the public's health

## **Faculty of Public Health's response to the Energy Retail Association's strategy to define and prevent the disconnection of vulnerable customers**

The Faculty of Public Health welcome's the energy industry's commitment to tackling the important issue of fuel poverty. We agree in principal with the proposals outlined in the Energy Retail Association's consultation and welcome industry's commitment to avoiding the disconnection of vulnerable groups wherever possible. However, there are a number of observations we would like to make:

The Faculty notes the industry's differentiation between customers who 'won't pay' and 'can't pay'. However, clarity is required on how a customer is defined as 'won't pay' – particularly in light of industry's wish to disconnect customers on this basis – some customers 'won't pay' *because* they 'can't pay'.

We would also ask for the inclusion of families with young children to be included in the list of those groups whom Ofgem and energywatch "have regard to the interests of".

The Faculty believes that a universal definition of what constitutes a 'vulnerable group' must be developed as quickly as possible and adopted by industry and welfare organisations alike. The list of benefits (which the consultation highlights as an aid to identifying vulnerable customers) is rather narrow and it may be difficult to tell if individuals are in receipt of benefits, without direct questioning – which may be viewed as intrusive. Nor is mention made of those people who are on low incomes but who do not receive any benefits. Consideration and provision should also be made for customers with numeracy and literacy difficulties, and who may not have English as a first language (making reading bills and letters, and accessing appropriate help, difficult). The Faculty recognises that the consultation states that the list is for guidance purposes only and that "wider judgement" will be required. However, comprehensive guidelines should be in place to ensure that 'judgements' avoid subjective decisions regarding an individual's level of vulnerability, and to aid early identification of individuals who may be at risk of disconnection. Above all, individuals should be treated with sensitivity and respect during assessment processes and enquiries into reasons for non-payments.

We welcome the commitment from industry to provide adequate 'safety measures' where there is danger of disconnection and the consultation outlines measures to ensure continued access to a fuel supply, such as the provision of prepayment meters. However, if an individual is unable to find funds to pay fuel bills the question does arise of whether or not they will have sufficient funds to put into prepayment meters – particularly if they are a low income household.

A proactive approach for the early identification and intervention for the protection of vulnerable customers should be further developed. Inequalities are based on many different variables and public health professionals and local authorities can provide expertise and knowledge on setting assessment criteria and conducting assessments.

Industry should, at every possible opportunity, promote advice on accessing help and where to find it, such as statutory benefits (eg. winter fuel payments) as well as general information on energy efficiency and how to access grants to support this – which many vulnerable customers may be eligible for.

The Faculty also welcomes the guidance from the Information Commissioner on the Data Protection Act on the disclosure of information on individuals who are at risk of disconnection or may already be disconnected. It is important that clear guidance on what constitutes a “compelling reason” (on the disclosure of information without an individual’s consent or knowledge) are agreed.

It is crucial that industry works in partnership with government, welfare, health and voluntary organisations to ensure that preventable tragic events, such as deaths last winter of the two south London pensioners, are avoided.

The Faculty, and its members, are committed to working with industry on defining what constitutes a ‘vulnerable group’. It is also committed to tackling the causes and consequences of fuel poverty. It has produced a Fuel Poverty Toolkit (which also defines various vulnerable groups) and a Fuel Poverty and Health briefing statement which outlines the key issues and information on fuel poverty.