

Response from Royal National Institute of the Blind (RNIB)

Ofgem Consultation Vulnerable Customers

Any issues of clarification to Andy.Barrick@rnib.org.uk

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1.1 Introduction

1.2 RNIB welcomes the opportunity to respond to this consultation on the definition of vulnerable customers.

1.3 RNIB is the largest voluntary organisation working with and on behalf of the hundreds of thousands of people with serious sight loss in the UK.

1.4 We run over 50 different services including advocacy and welfare rights services and we are thus aware of how benefit reliant and financially disadvantaged our client group are.

1.5 In addition people with serious sight loss are less mobile than disabled people in general, meaning that they are often heavy users of fuel in their homes.

2 Vulnerable Customers

2.1 We believe that the definition of a vulnerable customer given in the consultation is outmoded and focuses on the medical model of disability, using outmoded and inappropriate terminology such as “handicapped” and “infirmity”.

2.2 We would propose (in common with NCC) that it should include;

Households containing anyone over pension age, or adults or children who are disabled or have a long-term illness, or young children aged 5 or under.

- These requirements should be made part of the suppliers' licence obligations and backed by regulatory sanctions in the event of failure.
- 2.3 Obviously one of the key difficulties is to ensure effective identification of people who are vulnerable under the proposed definition.
 - 2.4 One easy way would be to ensure that all those on the priority registers could be asked if they want to be on the vulnerable household list. This would be an easy and cost effective way of identify a likely at risk group.
 - 2.5 In addition we would recommend that people should be encouraged to "opt in" as a vulnerable household if they so wish to. In this way people could request to go on the list if they can fulfil the basic criteria outlined in 2.1 above. Given that these households are likely to be more fuel dependent some form of incentive such as an annual or biannual free appliance check could be offered.
 - 2.6 We are not sure if social services staff are the most effective mechanism to identify those others who are vulnerable. Certainly they are one route and their role in providing support to those most vulnerable is a vital means of identification. However they are often brought in and involved where there is a crisis whereas other individuals and agencies such as the Pension Service, home visitors and others such as family and friends may be in contact on a more regular basis. If the "opt in" was not viewed as a stigmatising procedure then these people could act as a vital means of early identification.
 - 2.7 Finally there is some evidence that employees of public utilities can at least be trained in the basics of identifying those at risk. This has been noticeable in the British Gas Here to Help scheme where surveyors have been trained to pick up additional needs of those people that they have visited to assess for energy efficiency measures. Whilst recognising the limitations of such a mechanism, training in disability equality and awareness for home visiting staff could prove beneficial.
 - 2.8 We agree with the National Consumer Council that the guidance on the Data Protection Act should be revised so that it refers to "real risk to health" and includes other members of the

- household- not just the customer. We also agree that it should include advice about referral and how to identify an at risk person, including a responsibility for adequate training in this area. Further guidance around when it is appropriate to act without consent is needed, to protect households, utility companies and agencies working with those affected.
- 2.9 Consideration should also be given to extending the wording of the Data Protection Act so that it refers to “real risk to health and safety”. RNIB has come across cases in the past which have involved people with serious sight loss using completely inappropriate appliances (such as paraffin heaters) because they have been cut off from their existing fuel supply.

3 Summary

- 3.1 RNIB welcomes the opportunity to input into this consultation.
- 3.2 We propose that the wording of the terminology around vulnerability should be amended to include people living in households and that people should be able to opt in as well as being picked up by other agencies and identification mechanisms.
- 3.3 RNIB would be happy to practically support the expansion of guidance around vulnerability, both in terms of consultation and training of relevant individuals around the needs of those living with serious sight loss.

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