

Ofgem - Review of the Priority Services Register

Community Housing Cymru Group response

1. About Us

The Community Housing Cymru Group (CHC Group) is the representative body for housing associations and community mutuals in Wales, which are all not-for profit organisations. Our members provide over 155,000 homes and related housing services across Wales. In 2012/13, our members directly employed 8,000 people and spent over £1bn in the Welsh economy. Our members work closely with local government, third sector organisations and the Welsh Government to provide a range of services in communities across Wales.

Our objectives are to:

- Be the leading voice of the social housing sector.
- Promote the social housing sector in Wales.
- Promote the relief of financial hardship through the sector's provision of low cost social housing.
- Provide services, education, training, information, advice and support to members.
- Encourage and facilitate the provision, construction, improvement and management of low cost social housing by housing associations in Wales.

Our vision is to be:

- A dynamic, action-based advocate for the not-for-profit housing sector.
- A 'member centred' support provider, adding value to our members' activities by delivering the services and advice that they need in order to provide social housing, regeneration and care services.
- A knowledge-based social enterprise.

In 2010, CHC formed a group structure with Care & Repair Cymru and the Centre for Regeneration Excellence Wales (CREW) in order to jointly champion not-for-profit housing, care and regeneration.

Care & Repair Cymru (C&RC) are the "Older People's Housing Champion". We are a national charitable body and actively work to ensure that all older people have homes that are safe, secure and appropriate to their needs.

Care & Repair Cymru is committed to improving the health & wellbeing of older people in Wales by providing advice and assistance with home improvements, adaptations and general repairs.

We work in partnership with a number of organisations including the Welsh and local Governments and the Welsh NHS. We also work with third sector organisations and HAs to ensure that older people have access to a range of housing and social solutions that enable them to live in housing that meets their individual needs.

There are 22 Care & Repair Agencies covering the whole of Wales. Each agency provides a wide range of services and support for older and vulnerable people, helping them to remain living independently in their own homes and communities.

Summary of Community Housing Cymru Group's consultation response

CHC Group welcomes the review into Ofgem's the Priority Services Register (PSR). The PSR is an important service available to vulnerable households in the UK and CHC Group welcomes this review and future delivery considerations.

CHC Group makes a number of recommendations including:

- That services offered by all energy companies through the PSR be standardised to ensure that all energy providers are providing the same quality of services to vulnerable customers across the UK.
- That Ofgem work with CHC Group to develop and standardise the non-financial services that energy companies should provide to vulnerable customers who do not meet current PSR categories and eligibility.
- That Ofgem sets clear guidelines for energy companies on the services it needs to provide to vulnerable customers through the PSR.
- Energy companies need to offer wider non-financial services to a broader group of customers.
- The need to do research on LPG and oil distributors and how best to identify which LPG or oil fuel distributors supply to individual vulnerable householders on the PSR scheme.
- That Ofgem should utilise social media such as Twitter and Facebook to promote PSR and services provided by the energy companies.

Question 1:

Do you agree that energy companies should be required to offer non-financial services with the aim of equalising outcomes for customers?

CHC group recommends that services offered by all energy companies through the PSR should be standardised to ensure that all energy providers are providing the same quality of services to vulnerable customers across the UK.

CHC Group agrees that energy companies should be required to offer non-financial services to all vulnerable customers. HAs tenants in Wales are amongst the most vulnerable in society, however, many of these tenants do not fall into the PSR traditional vulnerable categories.

Recent benefit changes have affected housing association tenants and households to pay their energy bills and there is concern that vulnerable tenants and householders who do not fall into the PSR traditional vulnerable categories are unsupported by the energy companies.

We recommend that Ofgem work with CHC Group to develop and standardise the non-financial services that energy companies should provide to vulnerable customers who do not meet current PSR categories and eligibility.

Question 2:

Do you agree that we should continue to prescribe a minimum set of services? Do you support the proposed list of services? What additional services, if any, do you think energy companies should be required to provide?

Ofgem needs to ensure that energy companies provide the same standardised service under the PSR.

CHC Group also believes that Ofgem needs to widen the eligibility of customers for free gas safety checks. Gas safety checks; for example, are available to certain categories of PSR customers of some energy companies, such as British Gas;

However, gas safety checks are not offered to any PSR customers, by other companies, such as Swalec (SSE).

Support should also be available on, for example specially designed appliance controls and adaptors.

CHC Group recommends that Ofgem sets clear guidelines for energy companies on the services it needs to provide to vulnerable customers through the PSR.

Question 3:

If applicable, what services do you currently provide and what are the current costs of providing services (please break down by service). What financial impact do you think widening eligibility in the way we have proposed will have? Please provide evidence to support your answer.

The Your Benefits Are Changing (YBAC) campaign is led by CHC Group but involves over 100 partners including housing associations and support organisations with the aim of raising awareness of changes to the benefit system brought about by the Welfare Reform Act 2012. Currently the theme of the campaign is based on Bob, Budgeting, Online & Banking, the three main elements of Universal Credit. Partner organisations are supported by sharing all materials created during the campaign and allow distribution of information under one clear message.

A team of qualified money advisors not only give support through the helpline but regularly attend community events and drop in sessions across Wales. The YBAC team target preventative advice and aims to inform and prepare people from all tenures on the changing welfare system. Advising on welfare reform provides a great opportunity for our advisors to assess and signpost people for other financial help such as the PSR, warm home discount grants, water affordability and trust funds.

Since the Your Benefits Are Changing campaign started in November 2012, we have signed over 200 people to the PSR. YBAC has also supported over 600 people sign up to the Warm Home Discount.

The support provided through the YBAC has highlighted the effect the changing welfare system has had on the main groups that PSR accommodates, the elderly, disabled, sick and young children.

The YBAC team also works closely with Dwr Cymru to allow people to access the affordability tariffs available, including their Customer Assistance Fund.

YBAC offers a wide range of services which benefit vulnerable householders across Wales. The services YBAC provide is funded through various sources and would benefit from more sustainable funding from Ofgem and other governmental organisations to ensure that vulnerable customers continue to benefit from our great advice and support.

Housing associations work with and identify and support vulnerable tenants who are eligible for PSR support. Tenant Support Officers, Housing Officers and other staff at housing associations signpost and refer tenants to energy companies and sign vulnerable tenants onto the PSR on their behalf. Housing associations provide these services either through grant funding or through their own resources.

Care & Repair agencies work with older people to improve the energy efficiency of their homes and maximise income, to support people out of fuel poverty. Agencies are skilled in accessing all grants, charitable funds and fuel poverty schemes, locally and national and UK wide to support older people to live in warmer, more comfortable homes. In 2013/14 Care & Repair agencies provided over 1800 people with energy advice and assistance and over 1000 older people were supported with issues of damp housing. It is not possible to break down the cost of providing services around these issues, as it is encompassed in the broader service costs.

Navigating and comprehending fuel poverty schemes and energy company information, particularly in Wales, due to the number of national and locally available schemes, is incredibly difficult for the consumer. Care & Repair have ensured that their advisors are able to support older people to access schemes, which are best for them, through training and knowledge transfer.

Widening the eligibility will have no financial impact for CHC Group or housing associations in Wales.

Widening the eligibility will have no financial impact for Care & Repair in Wales.

CHC Group would welcome discussions on providing advice and support for vulnerable customers and sustaining these services in the future.

Question 4:

Do you agree that we should move away from requiring energy companies to provide services to disabled, chronically sick and pensionable age customers to an approach which requires energy companies to take reasonable steps to identify and provide appropriate services to any customer with safety, access communication needs?

CHC Group believes that energy companies should be required to broaden the services provided to customers under the PSR.

Recent benefit changes have affected tenants ability to pay their energy bills and there is concern that vulnerable tenants who don't meet the restricted PSR categories are not being supported by energy companies. Energy companies should be compelled to support low income householders, especially households with young people with children over the age of 5, mental health issues and those at risk of being disconnected, especially in the winter months.

CHC Group recommends that Ofgem and energy companies develop processes and policies to signpost and identify vulnerable customers.

CHC group agree with the Ofgem recommendation that energy companies need to be much more responsive to the individual needs of a customer. The majority of older people, for example, appreciate the safety and security of the application of password protection, which is, in most cases, offered as a service to PSR customers; however this would not always be appropriate for older people with dementia, who may struggle to retain such information.

Energy companies need to offer wider non-financial services to a broader group of customers.

Question 5:

Do you agree that energy companies should be required to maintain a wider register of consumers that they have identified as being in a vulnerable situation?

Yes. CHC Group agrees, in principle, that energy companies should maintain a wider register of vulnerable consumers. Ofgem needs to define and provide energy companies with a clear definition of the wider categories and type of customers it wants energy companies to identify. All energy companies should be required to maintain and support the same type of vulnerable customers to ensure that the wider list of vulnerable customers are identified and supported.

The security of all vulnerable people should be paramount. There needs to be guidelines and measures in place to ensure that all customers on any wider register are supported in the same way as those on the PSR list.

Question 6:

Do you agree that suppliers, DNOs and GDNs should share information about customers' needs with;

a) each other?

CHC Group agrees that energy suppliers should share when required information about customer needs when required. Ofgem needs to develop policies and procedures on the type of information energy companies can share, when energy companies can share information and guidelines on what to do with the information once it is not required.

There are many instances when DNOs and GDNs need to be aware of vulnerable householders in an area, for example when there are major issues such as a power cut or other issues affecting electricity or gas supplies. People on the PSR are usually the most isolated and would need to be prioritised in the distribution of information and extra care.

New and existing customers to the PSR would need to give consent and be aware that information on them is shared with other DNOs and GDNs, only when required.

b) other utilities?

The YBAC team works closely with Dwr Cymru to allow people to access the affordability tariffs available, including the Customer Assistance Fund which is available to householders who have water arrears but cannot afford to maintain both ongoing and debt related charges. These householders are heavily in debt with not only water but other utilities including electricity and gas. Many householders who receive support from energy companies through the PSR are sometimes eligible for support by water companies and other utilities.

Energy companies sharing information on vulnerable people on the register with water companies would benefit these consumers. Energy companies with Ofgem guidance should set up procedures to signpost householders onto the PSR to water companies and vice versa, especially when they become aware that a householder is having difficulty with more than one utility.

Ofgem would however need to work with Ofwat and other utility regulators to set guidelines on the type of information they can share between each other.

As with DNOs and GDNs, new and existing customers to the PSR would need to give consent and be aware that information on them is shared with other utilities.

Question 7:

Should energy companies be required to share information about customers' needs with other fuel providers such as LPG and heating oil distributors?

In areas of high density of non-gas areas in Wales, vulnerable householders only have access to LPG and oil. The issue with sharing information about customers with LPG and oil distributors is problematic. The problem with LPG and oil distributors, especially in rural areas in Wales is that many of these companies are smaller independent distributors, different to the much larger energy companies and utilities.

In principle, information should be shared on vulnerable customers who are in receipt of LPG or oil to heat their homes in the same way it is being considered with DNOs and GDN, however, identifying which distributor fuels individual vulnerable households could be difficult.

Ofgem needs to do research on LPG and oil distributors and how best to identify which LPG or oil fuel distributors supply to individual vulnerable householders on the PSR scheme.

Ofgem should consult with CHC Group and its members to identify LRG and oil distributors of its tenants.

**How could the transfer of this information work?
What are the benefits and risks of sharing the information?**

As stated above, many of the distributors of LPG and oil in Wales and the rest of the UK are much smaller than the larger energy companies and utility companies, therefore, the transfer of information could be more problematic and risky due to their size.

Question 8:

Do you agree that we should stipulate the minimum details that we expect energy companies to share, for example that names and phone numbers must be shared where they are available? Is there any other information that should be shared and for what purposes?

To ensure that Ofgem meets data protection and information sharing protocols, it needs to consult with the Information Commissioners office to ensure energy suppliers meet data protection rules.

Ofgem should stipulate and ensure that only the minimum details of vulnerable customers should be shared. Ofgem also needs to develop guidelines on what information needs can be shared, who can view the information and the length of time the information can be stored and later disposed.

Question 9:

Do you agree that energy companies should agree common minimum ‘needs codes’ to facilitate the sharing of information? Should we require energy companies to agree these codes?

CHC Group agrees that Ofgem and the energy companies need to develop a standardised minimum codes to facilitate the sharing of information.

As previously mentioned, Ofgem needs to consult with the Information Commissioners office to ensure energy suppliers meet data protection rules.

Ofgem should develop codes with the energy companies based on the Information Commissioners recommendations, protocol and processes.

How might this work and what mechanisms are already in place to facilitate this? What role would Ofgem need to have in this process?

Codes would be useful for the storing and sharing of information and would be simple to change as the vulnerability status changes.

As stipulated, Ofgem should develop codes with the energy companies based on the Information Commissioners recommendations, protocol and processes.

Question 10:

Should information about a customer’s needs be shared with their new supplier when they switch? What is the best way to facilitate the sharing of this information?

It would make perfect sense for information on customer’s needs be shared with a new supplier when they switch. However, to ensure that Ofgem meets data protection and information sharing protocols, it needs to consult with the Information Commissioners office to ensure energy suppliers meet data protection rules. Ofgem would need to set strict protocols and procedures to ensure that when a customer switches, information is not used for personal gain and ensure information on a vulnerable customers are not lost or mixed up.

Question 11:

Do you agree that a single cross-industry brand will raise awareness of priority services?

To ensure that more vulnerable customers become aware of the PSR and the services it provides, CHC Group agrees that a single cross-industry brand should be developed by Ofgem to promote the priority services.

A recognisable symbol would help raise awareness of the register and help potential customer sign up to the PSR. A recognised symbol or brand will also help third party referrals to the scheme and boost coverage.

Question 12:

Do you agree that a guidance document would help advice providers and raise awareness? Who should produce this document?

CHC group would welcome the development of a guidance document on PSR. A guidance document would be a useful tool for third party advisors such as YBAC, Care and Repair and housing associations understand individual PSR services provided by each energy company. It would also help third party organisations promote the service to vulnerable groups and individuals.

CHC Group believes that this guidance should be developed by Ofgem as the overseer of the PSR scheme. Ofgem would need to produce the document, providing the background to the scheme and rights of customers. The energy companies would need to keep Ofgem informed and provide concise information on the services they provide through PSR.

Question 13: What more can be done to raise awareness of priority services?

CHC Group recommends that Ofgem should utilise social media such as Twitter and Facebook to promote PSR and services provided by the energy companies.

CHC Group also recommends that Ofgem should develop a dedicated PSR website as a single point of contact for all energy company PSR services.

CHC Group's YBAC campaign uses a number of ways to communicate its services including its website, a telephone helpline and has a social media presence through



the Twitter and Facebook. We have also recently used a 'benefit bus' to tour across Wales promoting our service and support. More information on YBAC and the support it provides can be found on the www.yourbenefitsarechanging.co.uk website.

CHC Group has found that using social media and a dedicated website is a very useful and cost effective way of raising awareness and promote a service.