



Guaranteed Standards of Performance – Phase 1 report

Rachel Risely, Matt Evans and Anna
Maria Haque-Everding
Tel +44 (0)20 8742 2211
matt.evans@accent-mr.com
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Background

- The Gas Distribution Networks (GDNs) are regulated by Ofgem under the RIIO price control framework which is designed to mimic the effects of competition. The current price control (RIIO-1) will end on 31st March 2021, with the new price control (RIIO-2) starting on 1st April 2021. GDNs must submit their first draft of business plans in the summer of 2019.
- As part of their business plans, GDNs must set out the levels of service they provide to customers, including customers who might be, or at higher risk of being, in a vulnerable situation.
- The GDNs also have to work towards Guaranteed Standards of Performance (GSOP) which are statutory regulations that set out the minimum levels of service that distribution network companies must provide to their customers. The GSOPs include a standard (GS3) specifically for customers on the networks' Priority Services Register (PSR).
- Ofgem expect GDNs to set out in their business plans any additional value they provide to consumers outside of the price control/licence mechanisms (e.g. voluntary additional Guaranteed Standards of Performance payments).
- As Mary Starks outlined at the National Energy Action Cymru's Fuel Poverty Conference: *"Vulnerability is not a problem that one organisation can solve. It is only through collaborative working that we can hope to tackle these cross-cutting issues."*
- In line with this, Ofgem has dictated that the Gas Network companies need to conduct joint research to:
 - Assess existing GSOPs in the delivery of services to customers in vulnerable situations, and whether any new or extended standards are required.
 - Understand stakeholders' views on whether Ofgem's proposals for existing GSOPs reflect reasonable minimum standards that consumers can expect.

Objectives

■ This research has the following aims:

1. Understand how well the needs of customers in vulnerable situations are met by the GDNs
2. Assess if additional/revised GSOPs specifically for customers in vulnerable situations might be required, what these might look like and how they would support customers.
3. Measuring - across the Gas Network customer base - support (potentially including willingness to pay) for any new or modified GSOPs

■ The research is comprising of two phases:

- Phase 1:
 - ◆ A rapid desk review of existing evidence (the GDN's internal research and other research on the subject)
 - ◆ 16 telephone interviews with stakeholders working with or in the interests of customers in vulnerable circumstances (representatives of Gas Network partner agencies, consumer bodies, charities and other relevant organisations)
- Phase 2:
 - ◆ Primary research with gas customers to measure support for potential new/revised GSOPs.

Research undertaken

- This report presents findings from a rapid desk review of existing evidence and from interviews undertaken with stakeholders working with customers in vulnerable situations.
- The desk review included assessment of reports available from GDN research, GDN strategies regarding customers in vulnerable situations and reports from other bodies working in the interests of these customers. A full list of documents and reports included is set out in the appendices.
- The stakeholder interviews were with organisations working with consumers from a range of different vulnerabilities. Full details of participants are included in the appendices.

Executive Summary

Summary Findings overview

- The Gas Networks are generally serving customers with vulnerabilities well and GDN understanding of customer needs is improving.
- The Gas Networks have a similar understanding of the needs of customers experiencing vulnerability but there should be greater consistency between networks in the way in which vulnerability is described.
- The most significant gap is in customer awareness of the PSR, which needs to be increased, along with awareness and promotion of the GSoPs – both among end customers and the groups working to support them.
- The GSoPs are, broadly, fit for purpose and do not require wholesale change. However, a number can be improved and there is stakeholder support for enhancements.

GSoP review

- **GS3:**
 - ◆ 8am-8pm exclusion period is felt to compound the problem and should be removed (or at least reduced). Most important to reduce the exclusion period during the winter – seasonal adjustment may help
 - ◆ Payments should be scaled to degree of interruption to reflect the detriment
 - ◆ Payment levels should be higher
- **Compensation payments should be automatic wherever practicable:** requirement to make a claim is an unnecessary barrier
- **Guaranteed appointment time GSoP welcomed by stakeholders:** two-hour time slots are the favoured option
- **GSoP to offer face-to-face appointment widely supported,** but also alongside other digital forms of contact/communication
- **Provision of hot food GSoP considered a good idea for those experiencing most acute forms of vulnerability,** particularly if mobility difficulties or physical/mental capacity prevent use of alternative facilities
- **Alternative accommodation can be appropriate in some circumstances (particularly during extended interruptions/problems of access) but seen as too specific to individual cases to be suitable as a GSoP**
- **Widespread support for increasing compensation levels** (many stakeholders felt unable to suggest the 'right' level, however)
- **More stringent target times required for GS1 and GS2**
- **GS1 / GS2 / GS13 Compensation payments should use a sliding scale relative to the scale of under-performance**
- **GSoPs should encourage accessible and tailored forms of communication**

The status quo

Defining “vulnerability”

- **Ofgem:** Vulnerability = when a consumer’s personal circumstances and characteristics combine with aspects of the market to create situations where he or she is:
 - Significantly less able than a typical consumer to protect or represent his or her interests in the energy market; and/or
 - Significantly more likely than a typical consumer to suffer detriment, or that detriment is likely to be more substantial
- **Money Advice Trust (MAT):** Vulnerability is created by three related factors and suppliers need to consider these factors together, rather than in isolation:

Vulnerable situation

Individual factors

“about the consumer” such as a health condition, emotional state, communication difficulties

Personal circumstances

“about the consumer’s personal circumstances”, i.e. life events, sudden social/ household changes, low income, digital exclusion

Action/Inaction of provider

“both action and inaction on an organisation’s part can contribute to the creation of a vulnerable situation”

Physical disability
Mental health conditions
Financial hardship
Advanced age
Children under 5
Language barrier

Universally recognised

Life event
Pregnancy
Young adult recently out of care
Higher degree of isolation (living alone)

Not all these factors are always referred to in documented definitions/ communications across the sector and across the regulated industries

Stakeholder perspectives – definitions/eligibility

- Approach to vulnerability should take the **social model** – it is an individual's environment, in conjunction with access to services, that renders someone vulnerable. These are the disabling factors, not the individual's characteristics.
 - Can be viewed as a barriers model – how do we remove the barriers?
- Lifestyle changes need to be accounted for in definitions of vulnerability (family breakdown, recently left care/ prison etc)
- Low incomes (e.g. fuel poverty) should be in scope, but also unstable incomes in combination with low income
- Variance between electricity and gas needs to be accounted for - not all factors affecting vulnerability are consistent between electricity and gas
 - Sharing of data between GDNs and DNOs needs to account for the different ways that vulnerabilities interact with gas/electricity
- Generally, GDNs have very similar understanding of vulnerable customers' needs and offer similar support, but wording used around eligibility is not always consistent

Current GSOPs

- There are currently five non-connections guaranteed standards that apply to GDNs.
- One of these – GS3 – applies specifically to customers who have some form of vulnerability.

Standard	Description	Compensation for failure
GS3. Heating and cooking facilities for priority domestic customers	If you are registered on your supplier's Priority Service Register and your gas supply is interrupted, you will be provided with alternative heating and cooking facilities within 4 hours, or if more than 250 customers are affected, within 8 hours. (8pm-8am excluded).	If the GT fails and you inform them of their failure within 3 months of the interruption you will receive a payment of £24.
GS1. Supply restoration	If you are a domestic customer and your gas supply is interrupted as a result of a failure, fault or damage to your GTs pipeline system you will be reconnected/gas will be available at your property within 24 hours.	If the GT fails you will receive a payment of £30 if you are a domestic customer, and £30 for each additional complete 24 hour you are without gas up to a maximum of £1000.
GS2. Reinstatement of customer's premises	If the GT initiates work on your premises, your premises will be permanently reinstated within 5 working days of the completion of the engineering work.	If the GT fails you will receive a payment of £50 if you are a domestic customer, and £50 for each succeeding period of 5 working days thereafter.
GS13. Notification in advance of planned supply interruptions	When the GT carries out planned work to replace pipes or maintain the integrity of the gas system, they may need to interrupt your gas supply, if so, your GT will inform you of the date they expect to interrupt you and the reason why your supply needs to be interrupted, at least 5 working days before the interruption occurs.	If the GT fails and you inform them of their failure within 3 months of the interruption you will receive a payment of £20 if you are a domestic customer
GS14. Responding to Complaints	If you complain to a GT in writing or over the telephone, the GT will respond substantively to your complaint within 10 working days of receiving your complaint. However, if a visit to your premises or additional information from a 3rd party is required to enable resolution of the complaint, the GT will issue an initial written response within 10 working days of receiving your complaint to explain this situation and will then respond substantively within 20 working days from receipt of the complaint.	If the GT fails you will receive a payment of £20 and £20 for each succeeding period of 5 working days thereafter, up to a maximum of £100 If the 20-day extension has been applied and the GT fails to meet it, you will receive the compensation amount.

Ofgem's position

Status quo: where are GDNs now?

- **GSOP: GS3. Heating and cooking facilities for priority domestic customers**
- Definition “priority customer” according to Ofgem
 - A domestic customer who has been identified to the GDN by a registered gas supplier in accordance with their licence conditions, as having special needs.

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Initiatives currently upheld by some or all GDNs

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|--|--|--|
| ■ Expanding reach of Priority Services Register (PSR) <ul style="list-style-type: none">• Vulnerability Mapping• Partnerships – information sharing and referrals (DNOs, suppliers, charities etc)• Referral networks/schemes | ■ Training and communication <ul style="list-style-type: none">• Staff training programmes (identifying vulnerability and providing appropriate support)• Communication Materials• Advice Giving (energy efficiency, switching, debt) | ■ Incident help <ul style="list-style-type: none">• Identifying vulnerability• Support packs |
| ■ FPNES | ■ In-home support <ul style="list-style-type: none">• CO Monitor Alarms• Locking Cooker Valve | ■ Financial support <ul style="list-style-type: none">• Voucher Scheme• Fuel Poor Initiatives• Warm Homes• Warm Hubs |

Ofgem's position on GSOPs, winter 2018/2019

■ Existing GSOPs

- Any changes to existing GSOPs should not come at a cost to consumers. Ofgem does not envisage that the GDNs should have to undertake significant investment to achieve revised standards, where standards have been updated to reflect GDNs' voluntary behaviour or the existing business as usual.

■ Automatic payments

- At present, all but two of the GSOPs (GS3 and GS13) are paid automatically to customers when the standard is breached. Ofgem propose to make all GSOP payments automatic for RIIO-GD2.

■ In its RIIO-GD2 consultation Ofgem raised the prospect of new GSOPs, and industry-wide minimum standard of performance:

- To better support consumers in vulnerable situations in the event of an interruption.
 - ◆ E.g. offering face to face appointments for customers on the PSR to discuss works, or offering improved cooking facilities, hot food, shower facilities, and alternative accommodation for the duration of an interruption.
- Guaranteed appointment times, allowing customers more choice about when to allow engineers to enter their property to put them back on supply after an interruption.
- If new GSOPs are introduced, any associated cost for delivering them should be tested with customers.

Stakeholder perspectives

Ofgem's position on vulnerability, winter 2018/2019

- How GDNs should continue to support customers in vulnerable situations:
 - Assist vulnerable consumers during outages
 - Recognise and take proactive measures to address vulnerability when responding to emergencies
 - Provide subsidised connections to fuel poor households
 - Recognise and appropriately take into account vulnerability through their customer service functions
 - Identify consumers in vulnerable situations and offer them some additional assistance free of charge.
- Better linking with other Governmental support:
 - Ofgem's position: the price control should not fund vulnerability initiatives not directly related to GDNs' existing role. Funding for heating systems and energy efficiency measures should instead be through existing government initiatives, while enabling and encouraging GDNs to coordinate better with government schemes.

Overall, Gas Networks are supporting PSR customers well

- Generally, customers experiencing vulnerability are well served by the Gas Networks.
 - Many stakeholders not working directly with Gas Networks do not see/hear of network-related problems
- The RIIO framework has been effective in embedding good practices for vulnerable customers.
- GSoPs are critical in providing a safety net for the intersection between vulnerability and the absence of a support network.
- Gas networks are largely serving customers well, and they understand customers' needs better than in the past – but there is still room for improvement (e.g. in information / knowledge sharing).
- The biggest gap is in customer awareness / coverage of PSR and awareness of the GSoPs (among customers and groups representing them).

GS3: Heating and cooking facilities for PSR customers

- The standard, and target time, is reasonable, but could be improved with amendments.
- Key feedback 1: **Review compensation** scheme
 - Several suggest scaling of compensation to duration of interruption: payment should reflect the detriment
 - Having to make a claim for the compensation is a barrier – most will not know of the standard, how to make a claim or find it too stressful (too much hassle, no support, don't know how). It should be the company's responsibility to issue the compensation - remove that barrier.
- Key feedback 2: **Payment level insufficient** and in some cases retrospective payment is inadequate
 - £24 isn't sufficient to compensate for carer's time or to cover cost of e.g. takeaways
 - Compensatory GSOP payments not always suitable for those on very low incomes; time lag for receiving money is very impactful.
 - Questioned whether payment level acts as a sufficient driver of GDN performance

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Yes, I think that's fine. I think the more important thing is to ensure that people do have heating so people can heat their homes. I think the payment; I think that it's good that it's there and it's right that it's there, people need compensation but I think there's a much more important issue is ensuring that people can heat their homes throughout the issue with the gas network.

”

Standard

GS3. Heating and cooking facilities for priority domestic customers

Description

If you are registered on your supplier's Priority Service Register and your gas supply is interrupted, you will be provided with alternative heating and cooking facilities within 4 hours, or if more than 250 customers are affected, within 8 hours. (8pm-8am excluded).

Compensation for failure

If the GT fails and you inform them of their failure within 3 months of the interruption you will receive a payment of £24.

GS3: Heating and cooking facilities for PSR customers (cont.)

- Key feedback 3: **Timings** could be improved
 - Exclusion period could compound the problem for some vulnerable customers.
 - ◆ Night time exclusions can cause more problems for customers with strict routines
 - ◆ Times should be seasonably adjusted (most impactful in winter)
 - ◆ Some suggest a 10pm - 6am exclusion would be more reasonable.
- Key feedback 4: **Customer awareness** of GSoP needs to be raised

“

So the disruption to the routine in itself is a harm, and it can be very anxiety provoking and escalate the situation. So looking at GS3, that longer time period, particularly considering the exclusion of 8pm to 8am, I worry about what some vulnerable consumers would be doing to get through that 8 hours.

“

That's the thing [exclusion period] which is going to expose more of those PSR customers to significant risks of something; I suppose the detriment to their quality of life at that time is going to be more impacted during those hours. I understand why it's in place but you think about the impact.

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”

Standard

GS3. Heating and cooking facilities for priority domestic customers

Description

If you are registered on your supplier's Priority Service Register and your gas supply is interrupted, you will be provided with alternative heating and cooking facilities within 4 hours, or if more than 250 customers are affected, within 8 hours. (8pm-8am excluded).

Compensation for failure

If the GT fails and you inform them of their failure within 3 months of the interruption you will receive a payment of £24.

Improving GSOPs - Automatic payment

- Overwhelming **support** for this suggestion, but appreciation of the logistical challenges
 - It's currently unclear how all GSoPs could be automated, but where possible, GS3 in particular, should be done
- Clearer **communications** needed to show what customers are entitled to
 - Awareness currently is too low
 - Some customers don't have the capacity to claim
- Clearer **support structure** is needed
 - Customers still need to report problems as not every issue gets flagged by the system
- **Compensation options** need to be explored if this was to be rolled out
 - Vouchers are not always appropriate

“

I think the compensation that you have to claim yourself, it does favour the supplier because firstly you've got to know about it, firstly you've got to remember that you know about it which is again sometimes a little bit of a chore if you're elderly; you've got to know who to contact and again, the energy infrastructure providers are not always common knowledge, are they?

”

Description

If you are registered on your supplier's Priority Service Register, your gas supply is interrupted and your supplier owes you compensation, this will be done automatically.

Potential new GSOPs – Face to face appointments

- Perceived as useful, both to customer but also as insight gathering exercise for GDNs.
- However, not suitable for all and should be optional to offer vulnerable customers the flexibility they require
 - Online technology should be used more
 - ◆ Videos could be used to demonstrate clearly where work is planned
 - ◆ Technology to communicate with customers remotely instead of f2f, which can be threatening for some
 - Some customers might need an interpreter (foreign language, deaf people)
- Seen as a useful addition to offer this as an option to customers

Description

If you are registered on your supplier's Priority Service Register, your gas supplier will arrange face to face appointments to explain the procedure and impact on you.



Every time you engage with a customer, a vulnerable customer, you gain more information about that vulnerable customer and what you need to do for the next vulnerable customer you come across. So you change your behaviours on the basis of the customers you engage with.



Potential new GSOPs - Guaranteed appointment times

- Stakeholders welcome this idea
 - Provides peace of mind to customers, with knowledge of who will be arriving and when
 - Facilitates scheduling of hospital appointments and other commitments
 - Allows customers with a vulnerability time to prepare themselves physically or mentally
- Two-hour time slots highly beneficial, regardless of customers' circumstance and needs

“

A lot of the people that we work with have got almost daily hospital appointments so it's quite difficult; the assumption is they're elderly, they'll be at home but actually they've got a lot of things that they've got to go to and yes, it would be really useful for them to know okay, it's going to be a morning appointment, that's when it's going to happen. If it doesn't happen, I'll get compensation for it.

”

“

From a vulnerable customer's perspective, they might not mind when within a range... it's that level of granularity nearer the time that if they are in a wheelchair or they need to calm themselves down, if they've got a mental health issue for example, they need to get themselves in the right frame of mind to answer the door at that point in time. Just saying it's going to be within 2 hours or it's going to be within an hour makes them prepare for a whole hour when actually when they only need to prepare for 5 minutes.

”

Potential new GSOPs – Additional support (e.g. Hot food, shower facilities, alternative accommodation)

- Stakeholders responded positively to the suggestions of additional support
- In particular, hot food would be a welcome substitute to alternative cooking facilities for customers unable to use alternative facilities
- If ongoing for more than 24 hours, alternative accommodation good to consider, but probably not a GSoP – practically too challenging and costly
 - Could be difficult to find appropriate alternatives
 - Moving customer with very specific needs should be last resort
- Depends on length of interruption (e.g. 5 days+ a necessity)

“

Where it's over 24 hours, temporary heating and cooking facilities are probably not as appropriate for a customer in a vulnerable situation so imagine somebody with severe arthritis for example actually having to turn on and off heating or cooking facilities which are not adapted for their use might be very, very difficult."

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“

The customer will prefer to be in their own home. Bare in mind the equipment that might be needed. It's no good giving someone the nearest Holiday Inn."

”

GS1: Supply restoration

- Generally perceived as reasonable (in conjunction with GS3)
- Ofgem's proposed faster response time (18 hrs) would be preferable for customers with vulnerabilities
- Compensation levels should be reconsidered
 - Initial compensation is not high enough
 - ◆ Should start at £50 for the first day
 - Compensation should be scaled – subsequent days may cost a lot more through the knock-on effect

“

I think what's interesting is that you get £30 every 24 hours so it almost feels like it should be increased so the first payment might be £30, the second payment for the following 24 hours I suggest should be higher, more like £50 or £60 to reimburse all of the additional costs that you'd be having to make do so the cooking would be completely out of action; other ways to heat your house because obviously heating the room is always at a cost so perhaps it should be a little higher.

”

Standard

GS1. Supply restoration

Description

If you are a domestic customer and your gas supply is interrupted as a result of a failure, fault or damage to your GTs pipeline system you will be reconnected/gas will be available at your property within 24 hours.

Compensation for failure

If the GT fails you will receive a payment of £30 if you are a domestic customer, and £30 for each additional complete 24 hour you are without gas up to a maximum of £1000.

GS2: Reinstatement of customer's premises

- **Time period** is deemed inappropriate
 - The five day period is considered too long, particularly in winter and if the works affect customer's accessibility of property
 - Consider lowering this to three days for customers on PSR and/or look at winter-specific target
 - ◆ This would also align with Ofgem's proposed shorter reinstatement period

“

I have seen situations where the contractors who are working for the gas company are maybe not necessarily undertaking the civil engineering works in a manner that would be to the advantage of residents [...] You're having walkways then people don't feel very stable, safe using those especially with zimmer-frames and any kind of equipment like that. I do wonder how they would get on. 5 days seems an awful long time.

“

“Having an arbitrary 5 days probably encourages them to do it at the same time so it's probably the best solution for a bad bunch to be perfectly honest.”

”

”

Standard

GS2. Reinstatement of customer's premises

Description

If the GT initiates work on your premises, your premises will be permanently reinstated within 5 working days of the completion of the engineering work.

Compensation for failure

If the GT fails you will receive a payment of £50 if you are a domestic customer, and £50 for each succeeding period of 5 working days thereafter.

GS13: Notification in advance of planned supply interruptions

- Range of needs have to be taken into account for **communication of advance notice**
 - Alternative solutions to letter communications is needed (videos etc)
 - Ask neighbours to assist in informing vulnerable customers appropriately
 - Consider adding “communication in an accessible manner” to GSoP
- Length of **time**
 - Generally feels appropriate to most, though one stakeholder sees 10 days as better for those with mobility issues
 - Time is more important than compensation
- **Compensation**
 - Should be on a sliding scale – less notice given, more compensation

“

Five working days can be a very long time for most of the vulnerable groups that we would support with advice.

”

“

I can't think of any other way of doing it other than knocking on every door and saying 'This is what's going to happen' which in reality isn't practical.

”

Standard

GS13. Notification in advance of planned supply interruptions

Description

When the GT carries out planned work to replace pipes of maintain the integrity of the gas system, they may need to interrupt your gas supply, if so your GT will inform you of the date they expect to interrupt you and the reason why your supply needs to be interrupted, at least 5 working days before the interruption occurs.

Compensation for failure

If the GT fails and you inform them of their failure within 3 months of the interruption you will receive a payment of £20 if you are a domestic customer.

GS14: Responding to Complaints

- Generally considered appropriate
- Should consider communication needs and abilities of customers.
- Customer service teams need to be aware that not all customers can communicate with them and therefore carers/family members should be allowed to act on their behalf

Standard

GS14. Responding to Complaints

Description

If you complain to a GT in writing or over the telephone, the GT will respond substantively to your complaint within 10 working days of receiving your complaint.

However, if a visit to your premises or additional information from a 3rd party is required to enable resolution of the complaint, the GT will issue an initial written response within 10 working days of receiving your complaint to explain this situation and will then respond substantively within 20 working days from receipt of the complaint.

Compensation for failure

If the GT fails you will receive a payment of £20 and £20 for each succeeding period of 5 working days thereafter, up to a maximum of £100.

If the 20-day extension has been applied and the GT fails to meet it, you will receive the compensation amount.

General advice on GSoPs, including other suggested GSoPs

- There should be a commitment to best practice sharing – between GDNs and also cross-sector
 - Continue to raise awareness of PSR
 - Update systems to assess eligibility
 - More could be done to promote GSoPs and compensation scheme
 - Customers need to know their rights
 - Ofgem should support here as well
 - Don't let a GSoP get in the way of providing tailored services based on individual needs
- Potential other GSoPs?
 - Some mention of target for number of customers contacted/added to PSR
 - ◆ Could even go down to “numbers of doors knocked on” etc

Next steps

Next steps

- GDNs review findings and stakeholder feedback on proposed GSoPs / revisions
 - Assess and agree those which have potential for taking forward
- Decide if and how revised GSoPs should be further refined / tested with end customers and/or stakeholders



Rachel Risely

Tel +44 (0)20 8742 2211

Rachel.risely@accent-mr.com

Matt Evans

Tel +44 (0)20 8742 2211

matt.evans@accent-mr.com

Anna Maria Haque-Everding

Tel +44 (0)20 8742 2211

AnnaMaria.Haque-Everding@accent-mr.com

Appendices

Stakeholder interview participants

Organisation	Name	Role
Blind Veterans UK	Michael Byrne	Project Manager
Citizens Advice	Elizabeth Errington	Principal Policy Manager
Committee on Fuel Poverty	Alice Maynard	Committee Member
Communitas Energy CIC	Lee Cattermole	Program Director
Community Action Northumberland	Christine Nicholls	Community Development Officer
Groundwork	Simon Kilshaw	Green Doctor Manager
HEET	Tom Ruxton	Coordinator
Highfield Food COOP	Mr Warris Ali	Chairperson
Macmillan Cancer Support	Sharon Jackson	Energy Team Leader
MS Society	Leah Haynes	Grants Manager
National Energy Action	Matthew Copeland	Policy Manager
Northumbrian Water	Denise Bedford	Customer Policy Coordinator
Royal Association for Deaf people (RAD)	Linda Parkin	Strategic Development Manager
Spinal Injuries Association	Simon Pinnell	Advocacy Manager
Yorkshire Energy Solutions	Duncan McCombie	CEO
Yorkshire Water	Ash Roberts	Safeguarding Lead

Literature reviewed

Sector	Author / Body Commissioning Research	Title	Year
Energy - regulator	Ofgem	Vulnerable consumers in the energy market: 2018	2018
		Consumer Vulnerability Strategy Progress Report, 2015	2015
		Mary Starks' speech at National Energy Action Cymru's Fuel Poverty Conference	2019
Gas Sector – GDN Strategies	Cadent	Customer Standards of Performance / Stakeholder engagement incentive submission	2018 / 2017-2018
	NGN	Vulnerability Strategy / Stakeholder engagement incentive submission	2017-2018
	SGN	Vulnerable Customer Policy / Stakeholder engagement incentive submission	2019 / 2017-2018
	WWU	WWU Customer Service Charter / Stakeholder engagement incentive submission	2017-2018
Gas Sector – GDN Research Reports	Cadent	Outcomes from CIVS and Safeguarding Report	2019 / 2017-2018
	Wales and West Utilities Northern Gas Networks	Stakeholder Research Programme	2018
		Vulnerability 'Deep Dive'	2019
		Understanding vulnerable customer personas & journeys	2015
	SGN	Vulnerable Customers Analysis	2019 (2017?)
Water Sector	Ofwat	PR19: Initial Assessment of Plans	2019
	UU	PR19 Business Plan - Addressing affordability and vulnerability	2018
	Severn Trent	PR19 Business Plan - Addressing affordability and vulnerability	2018
Electricity Sector	WPD	RIIO-ED1 Business Plan Overview	2014
Others	Money Advice Trust	Vulnerability, Mental Health, and the Energy Sector, 2017	2017
	UKRN	Making Better Use of Data: Identifying Customers in Vulnerable Situations, 2017	2017
	NEA	Response to the Commission for Customers in Vulnerable Circumstances' Call for Evidence, 2018	2018
		NEA Response to Ofgem RIIO-2 GDN Sector-Specific Consultation	2018
	Citizens Advice	Living Up To The Standards	2015-16

Literature review: detailed findings

Gas Network companies: potential areas of best practice

- Generally, GDNs have very similar understanding of vulnerable customers' needs and offer similar support
- Although jointly used needs codes exist, wording used around eligibility is not always consistent
- Examples of best practice initiatives undertaken by GDNs include:
 - Community Promises Funding Initiative (NGN)
 - Help to Heat Scheme (SGN)
 - Specialist Panels (SGN)
 - Needs analysis mapping tool and Safeguarding Customer Working Group (Cadent)
 - CO Awareness Education Training (WWU)
- Other best practice suggestions identified through desk research
 - Review of 'vulnerable customer' definition to include
 - ◆ Single-person household (in combination with other risk-factors)
 - ◆ Young adult householders (who have recently left local authority care, prison etc)
 - Individual/customised solutions, tailored to specific vulnerability. Updating PSR to include other information to tailor service: next of kin/ carer details; communication preference; nature of vulnerability and impact on additional services required etc.
 - ◆ Need for a hierarchy of priority categories within the broader 'vulnerable customer' category?
 - Dedicated customer vulnerability hotline
 - F2F preferred contact where possible
 - 'Knock and Wait' service


Ofwat recommendations from PR19 review

- Companies should register a minimum of 7% of households to the PSR by 2024-25.
 - Companies may choose to set a level that is higher than this minimum level.
 - When setting the new target, companies should consider the needs of customers in vulnerable circumstances in their region by consulting available data and engaging with relevant third parties.

- Companies should contact a minimum of 90% of registered customers every two years to make sure they are still getting the right support.

Water sector vulnerable customer case study: Severn Trent

■ Understanding vulnerability

Understand and learn		Identify	Respond
Identify what could trigger an issue	Identify customers' circumstances that could increase susceptibility to, or size of, adverse impact	Promote services	Accessible channels Accessible information Support when you contact us Support when we contact you
		Proactively find those with specific needs	Proactive advice in an incident Alternative supplies directly to customer in an incident Support with issues on customer property
		Develop a suite of personas to explore who could be impacted, when and how	Help to prevent fraudulent activity

■ New performance commitment: “priority focus area”

- Tailored support to meet customers’ specific needs
- Easy access to services for all customers
- Reaching more people than ever before

■ Ways to achieve this?

- Customer personas important in understanding vulnerability and schemes needed to improve offering
- Identification of triggers of vulnerability important **when mapping triggers against customer personas**
- Increase in customers on PSR
 - ◆ Active promotion of services via social media
 - ◆ Data sharing with WPD from 2019/2020
- Using robotics and automation to drive efficiency and service level improvements of care and assistance team

Best practice:

- Tailored service (based on customer personas)
- Promotion of PSR and services for vulnerable customers via social media

Water sector vulnerable customer case study: United Utilities

■ Targeted services to support customers in vulnerable circumstances

- Working with partners
 - ◆ Age UK, StepChange, Citizens Advice etc
 - ◆ Creation of independent Affordability and Vulnerability Panel
 - ◆ Data sharing
 - Establishing North West Community Advice Hub / CACI's ACORN / Credit Reference / Agency data sets / ONS / Internal data / ENW
- Driving customer engagement and registration on the PSR
 - ◆ Active promotion of scheme, newspapers and pharmacy packaging in partnership with ENW to help self-identification
- Trained contact staff
 - ◆ MIND, The Samaritans
- Contact channels for all kinds of vulnerability
 - ◆ ReciteMe (online tool)

Best practice:

- Tailored and selectable service
- Data sharing between water and electricity sector

■ Tailored service for vulnerable customers

- Proactive communications during water supply issues or flooding, providing reassurance, help and guidance
- Relocate meters to more accessible locations if the customer may find it difficult to access
- Nominee scheme if customers have difficulty in communicating so a friend or family member can manage their account on their behalf
- Knock and wait protocol when visiting customer homes who may have limited mobility
- Choice of preferred mode of contact
- Password scheme when visiting customers' homes to help protect against bogus callers
- Text Generation Text service to help people with hearing loss to access the call centre
- Key language leaflets
- Braille, Large print or Audio leaflets and bills
- Translation service

Electricity sector vulnerable customer case study: **Western Power Distribution**

■ Working in partnership:

- British Red Cross, RVS, oxygen providers, Local resilience forums, Age UK, 'Louder Than Words', 'Language Line' (service to provide translations for customers), Mencap (easy read format leaflets), High Jinx (disability theatre group, for staff training), Warmfront/Home Energy Efficiency Scheme, National Energy Action

■ Certification to BSI 18477:2010 (fair, flexible services that can be used by all consumers equally, regardless of health, age or personal circumstances)

■ Staff training

■ Improving data held on PSR

- Contact PSR customers every two years
- Data sharing with other agencies (Centre for Sustainable Energy)

Providing additional services for vulnerable customers

- **Publicising** PSR, incl through partners such as Age UK
- **Assisting** vulnerable customers to be prepared for a power cut
 - ◆ Direct dial telephone number for medically dependent customers
 - ◆ Advice letters and leaflets
 - ◆ Information online
- Providing additional services for vulnerable customers **during power cuts**
 - ◆ Telephone service for medically dependent and blind customers prior to planned outage
 - ◆ If necessary, home visits
 - ◆ Medically dependent customers contacted within three hours of prolonged power cut
 - ◆ Crisis packs
 - ◆ Contact Centre staff can arrange for partner organisations to attend and provide support (in multiple forms)

Best practice:

- Direct dial telephone number
- Monitoring, incl contacting PSR customers every two years

NEA: Response to the Commission for Customers in Vulnerable Circumstances' Call for Evidence (2018)

- Anomalies with eligibility criteria for PSR - those in or at extreme risk of fuel poverty not being captured by a specific vulnerability flag or needs code.
- Greater segmentation of vulnerability and an enhanced focus on helping with worst first
- GDNs must be required to identify any enhanced needs low income and vulnerable customers or support they require when responding to an emergency gas incident or capping a gas supply
- Ofgem should investigate the setting of and recovery of network costs within standing charges to ensure low income consumers that may only top up their pre-payment meters rarely, don't lose credit due to standing charges before they can access any energy

Citizens Advice: Living up to the Standards?

- Gas Network performance rated as very good, especially in gas emergencies
- Lower performance among gas networks in some areas where Ofgem didn't set performance targets
- Gaps in the data provided to Ofgem result in limitation of performance review.
- Recommendations
 - **Ofgem should introduce automatic compensation for all Guaranteed Standards.** Onus on energy networks to identify failures and compensate their customers. Removes any requirement for customers to submit a claim for compensation.
 - **Ofgem should extend the use of penalties against networks that do not pay out the due compensation to cover all standards** so that networks are further incentivised to identify and compensate customers that were not served in line with the Guaranteed Standards.
 - **While much performance is outstanding, pockets of poor performance remain.** Network companies should reflect on how they can improve, make customers aware of the standards and share best practice with each other.
 - **Ofgem should review its reporting requirements for networks,** ensuring that information about the scale of non-payments is captured and that networks interpret the requirements in the same way.

Money Advice Trust: Vulnerability, mental health and the energy sector: a guide to help identify and support consumers

■ Three situations can create vulnerable situations

- Individual factors
 - ◆ Health condition, emotional state, communication difficulties etc
- Personal circumstances
 - ◆ Life events, low income, digital exclusion
- Action (or inaction) of firms and others

■ Key points to consider from suppliers point of view

- Avoid assumptions
 - ◆ Not all customers who are assumed to be vulnerable experience difficulties.
 - ◆ Not all customers who used to be vulnerable previously are still vulnerable now.
- Detriment
 - ◆ Useful to define what vulnerability means to customer and supplier

■ Identifying a vulnerable situation

- Encourage self-disclosure
- Look for 'red flags'
- Look for limitations

■ Supporting consumers in vulnerable situations

- Accumulate relevant evidence
- Identify approach for consumer
- Inform staff of alternatives/options on offer
- Make decision for customer

■ Developing skills and knowledge

- Awareness training is not enough
- More should be given to (and asked from) training partners
- Staff in non-contact roles also need training

Best practice:

- Digital exclusion as indicator of vulnerability
- Emphasis on training needs across the organisation

UKRN: Making better use of data: identifying customers in vulnerable situations (2017)

- Data sharing is key to identify vulnerable customers and give them the support needed
 - Cross-sector data sharing can be extended by:
 - Building customer confidence
 - ◆ Customer empowerment
 - ◆ Targeted customer engagement
 - ◆ Demonstrating customer benefit
 - Effective (company) collaboration
 - ◆ Security of data during transfer
 - ◆ Documenting customer needs
 - ◆ Data quality
 - Most existing initiatives are small in scale and tend to be localised, but they focus on these areas:
 - Using a wide range of data sets to better understand customer demographics
 - Using referrals as a way to flag to other companies the customers that may be entitled to support
 - Developing ways to enable customers to sign up to multiple support schemes in one go
 - Sharing data to allow companies to identify and support customers through a seamless and stress-free customer experience
 - Signposting customers to support services offered by other companies
 - Matching data between different data sets to verify customer eligibility to different support schemes
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