



## 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 158,000 homes and related housing services across Wales. In 2014/15, our members directly employed 8,800 people and spent over £2bn (directly and indirectly) in the economy, with 79% of this spend retained in Wales. 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 CREW Regeneration Wales in order to jointly champion not-for-profit housing, care and regeneration.

### Priority Services Register Review – Final Proposals

CHC would like to submit some general comments in regards to the priority services register and certain recommendations noted in the consultation document.

CHC feels that there needs to be more protection for vulnerable people particularly on pre payment meters. Housing associations have large numbers of tenants using pre payment meters who are firstly paying more for their energy. Continuing supply to tenants with pre



payment meters depends on how affordable it is for the tenant/householder to top up their meter. If an individual has no money to put into the meter, they are essentially cut off from using energy and sometimes there are unforeseen events which impact someone's ability to afford to heat their home from one month to another. CHC would like to see emergency credit for those people on the priority services register, particularly those using pre payment meters (above and beyond what is normally available).

## Eligibility and customer identification

Better liaison is needed from energy companies and distribution network operators with housing associations and local authorities in respect of identifying vulnerable tenants and those in financial difficulty already. There is an issue of who ID's and then who decides on 'vulnerability' but it's very important that we share information and suppliers have a protocol to link with housing associations who mostly have financial inclusion teams. These teams can provide all kinds of information and can also liaise with customers and support. Some advice services elsewhere and charities are busier but can of course be less reliable due to cuts. This also goes for distribution network operators who need more core information on vulnerability as it relates to power outages etc. A link and protocol with housing associations and tenants could have a big impact on outcomes dealing with issues early, by a trusted interlocutor where we share information.

- **Make it the responsibility of suppliers and distribution networks to identify the appropriate customers for PSR services**-we need to improve referral systems including referrals from health (GP's for example). We need to link this responsibility to identifying who is eligible for the warm homes discount and also ensure these people are switched to the cheapest energy tariffs. We need to be signing people up to the PSR when they are switching energy etc.
- **Apply an outcomes-based model to services offered by suppliers; remove 'core' eligibility groups for supplier services and instead introduce a broader eligibility requirement based on customer need.** CHC would agree with this in principle but it is only effective if the process of being able to identify people who need this support is effective.
- **Retain core groups for the safety-related services offered by distribution networks as a minimum. As part of this we propose to add families with children aged five and under to the core eligible groups based on evidence that this group suffers detriment from disrupted supply.** -CHC would agree with this
- **Our changes will ensure that PSR support is better targeted to customers in vulnerable situations**-CHC would agree with this



## General comments

Most people are not aware that the priority services register exists. The Onus is on people to sign up to the PSR. What if they had never been told about it? When signing a new customer up, the supplier or distribution networks could explain what the register is and then ask whether the household fits into the eligibility category. Many people, for example, are automatically put onto the Priority Services Register for electricity when they have an oxygen concentrator machine, but they had been severely disabled for many years prior to this and have needed support. More education is needed for example in hospital teams to help inform patients. There should be leaflets in GP waiting rooms, etc. The scheme should be opened up as necessary and widely as possible (opening up the scheme to more disabled people, but also other types of vulnerable households). Perhaps a question in the future could be if someone is on Universal credit, is there an Alternative Payment Arrangement in place as these are for vulnerable groups only but a diverse range of reasons.

We need more and better referral systems through money advisers for example as well as having access to an emergency fund, a fund which money advisers, for example, can ensure that vulnerable people access. CHC would like to understand why Ofgem did not go ahead with proposals to add pregnant women to eligibility for free gas safety checks as this could have clear benefits.