

CONSULTANT ASSESSMENT AGAINST THE CONSUMER VULNERABILITY CRITERIA

FINAL REPORT

siapartners

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Introduction

This report prepared by Sia Partners for the Electricity and Gas Markets Regulator, Ofgem, critically assesses electricity distribution network companies against Ofgem's high-level Consumer Vulnerability Criteria. The report is referred to by Ofgem in the SECV Incentive Guidance as "the Consultants' Report".

The scope of this report is to inform the Independent Panel that will assess network company performance against the Panel Assessment Criteria, most notably criterion five ("the quality of the network company's strategy to address consumer vulnerability and the quality of the outcomes delivered"), set by Ofgem.

Sia Partners has reviewed each DNO's Part 3 SECV Submission and gathered evidence to justify a certain level of performance in addressing consumer vulnerability under various aspects. Each network company had the opportunity to address questions Sia Partners posed regarding the content of the submission document, during site visits at the company's premises.

A methodology was developed by Sia Partners, tailored to requirements of this project and the feedback received from relevant stakeholders. The report develops by introducing the scoring methodology and proceeds to introduce the performance of each DNO justified by evidence gathered in the submission document review and during site visits carried out. DNO performance is scored, justified and discussed in the chronological order of site visits.

We consider all DNOs have made substantial progress in relation to service delivery to vulnerable customers. We are confident that with the initiatives in place, services and outcomes for vulnerable customers across the sector will continue to improve.

In undertaking this assessment we have agreed a general approach with Ofgem, a methodology, questions for the DNO meetings and a scoring system. We have communicated the general approach with DNOs which is:

- An expectation that at a minimum, all the specific requirements detailed by Ofgem for the submission should be addressed.
- Submissions should not be presented as a PR document but should focus on outputs and outcomes for vulnerable customers.
- Outputs and outcomes should be supported by clear evidence.
- The submissions should not be a static annual document but should be able to demonstrate a pathway for improved services for vulnerable customers in this year and in future years.

Using this general approach together with the specific methodology, the questions and discussions with DNOs, we consider has delivered a comprehensive, impartial and thorough assessment of DNO performance in relation to consumer vulnerability.

Overview of Results

The table below summarises the findings of our assessment. The numeric values associated to each Sub-Criteria are the result of our scoring methodology presented in the following section. Each value is associated to a nominal 'grade' such as 'Good'. The conversion from a numeric value to a nominal one was based on the scoring range provided by Ofgem in the *SECV Incentive Guidance Document*.

| Sub Criteria | DNOs | | | | | |
|---------------------|-------------|-------------|-------------|-------------|-------------|-------------|
| | WPD | NPG | SPEN | UKPN | SSE | ENWL |
| A | 9/Excellent | 9/Excellent | 8.5/Good | 8/Good | 8/Good | 8/Good |
| B | 8.5/Good | 8/Good | 8.5/Good | 8/Good | 7.5/Fair | 8/Good |
| C | 8.5/Good | 8.5/Good | 8.5/Good | 8/Good | 8/Good | 7.5/Fair |
| D | 8.5/Good | 8/Good | 6.5/Fair | 7.5/Fair | 7.5/Fair | 6.5/Fair |
| E | 9/Excellent | 8.5/Good | 8/Good | 7.5/Good | 8/Good | 8/Good |
| Total Scores | 43.5 | 42.0 | 40.0 | 39.0 | 39.0 | 38.0 |

Throughout the report each network company will be able to analyse their performance with a high level of granularity. Evidence based justification has been provided for the measures that DNOs have satisfied. Furthermore, general indication of the limitation in a DNO's performance was provided, where possible and appropriate.

Methodology

In this chapter we present the methodology utilised to grade the Part 3 SECV submissions submitted to Ofgem by DNOs. We will start by introducing the key principles that guided the design of the methodology.

Key Principles

We designed a scoring methodology tailored to the objective of this project: transforming qualitative and quantitative evidence of consumer vulnerability output into a numerical score. The starting point was the *Detailed Consumer Vulnerability Sub-Criteria* guideline provided by Ofgem in their SECV Incentive guidance document. These guidelines provided the yardstick against which to compare the evidence collected from DNOs and assess their performance from 'Weak' to 'Excellent'.

Building on the scoring guidelines we set out to tailor our approach to the scope of this assessment and the needs of our client, Ofgem, and the Network Companies. For this purpose we drew a list of characteristics that our methodology needed to meet:

- **Simple** – We focused on making the results of our analysis clear and easy to read and understand for Ofgem, the Distributors as well as the wider public, including vulnerable consumers.

- **Based on evidence** – Our analysis of DNO performance on their SECV Part 3 Submission was based exclusively on the evidence provided in the submission document and on the one gathered during the site visit, based on questions related to the submission document.
- **Addressing nuanced performance** – We focussed on addressing differences in how DNO performed on specific Sub-Criteria. A network company, for instance, might excel at identifying additional consumers to register on the PSR, but simultaneously, lack in the services that it offers these consumers. Furthermore, it was crucial to capture differences in scope and scale of any two similar activities addressing consumer vulnerability needs that DNOs may be undertaking.
- **Indicating room for improvement** – We focussed on designing an approach which allowed DNOs to understand on which specific areas their performance could improve. It was important however to not act as an external advisor but rather retain the role of an *independent assessor*. For that reason we point to areas of lacking performance and insufficient evidence and let network companies interpret and address this as they see fit.

The list of key principles presented shaped the way we built and developed our scoring methodology starting from the Sub-Criteria guidance document. This list was based on feedback from Ofgem and the DNOs and evolved throughout the project before reaching its final form. Here is an overview of the feedback received:

- **Ofgem** – The regulator was focused on ensuring a constant treatment of DNOs throughout the process of site visits, and also placed emphasis on simplifying the methodology and the way results were shown and justified.
- **DNOs** – Distributors were mainly concerned that the scoring methodology should point to room for improvement and that it factored a level of sensibility in scoring similar activities reflecting their outputs.

Having seen the principles and feedback that drove the design of the methodology, we will now present it in its final form.

Scoring DNOs Performance – Our Process

For the sake of clarity we have divided the scoring process in four parts and will present it in this way.

Dividing Sub-Criteria into “boxes”

The basis of our methodology was provided by the Sub-Criteria scoring guidelines. Each “box” in the scoring sheet represents a different requirement to be fulfilled.

A series of boxes is nested under the same grade (i.e. ‘Good’), so as to allow for a clearer view of DNO’s performance in each Sub-Criteria. To give a practical example, the box titled “Full Senior management buy-in to the network company’s strategy in this area” indicates good performance under Sub-Criteria E.



Assigning weights to different grades

DNOs fulfil requirements which are seen by Ofgem as indicating different levels of performance (i.e. 'Weak' vs. 'Excellent'). In our assessment we need to distinguish strong performers from weak ones.

To make this distinction we associated numbers to respective grades following the scoring guide included in the SECV guidance document. We assigned the mid-point of each interval to the corresponding grade. We interpreted the scoring range provided by Ofgem in the following way:

| | Weak | Fair | Good | Excellent |
|----------------------|-------------|-------------|-------------|------------------|
| Scoring Range | 0-6.0 | 6.01-7.99 | 8-8.99 | 9.0-10.0 |
| Weight | 5 | 7 | 8.5 | 9.5 |

The exception to this rule was the value provided to the lower category, a midpoint for the 'Weak' category would have been set at 3 however that would have implied that weak measures would have impacted the final scoring unproportionately. For that reason, based on a review of options we assigned the value 5 to 'Weak'.

Review evidence

Based on the review of Part 3 SECV submissions and based on the questions we asked during the site visits, we have compiled a list of evidence that justifies the grade given to each DNO.

We structured the report by matching the evidence recorded with each requirement fulfilled by the DNO (in other words, each box checked).

A full point was awarded for requirements that we felt were fully satisfied. Importantly, we awarded ½ points for requirements partially met or demonstrated (i.e. pilot projects or projects under development do not fully satisfy the requirements of the measure)

Calculate weighted average

In order to transition from a qualitative assessment to a quantitative one we carried out a weighted average which multiplies the number of boxes by their respective 'weight' and then divides the total by the sum of the weights. This yields a 'Final Score' for each Sub-Criteria.

Based on the feedback from Ofgem we have decided to show results in whole number and .5 increments. As a result we devised the following rounding rules for final scores:

| | | | |
|-----------|---------------|---------------|-----------|
| 0 - 0.249 | 0.250 - 0.499 | 0.500 - 0.749 | 0.750 - 1 |
| 0 | 0.25 | 0.5 | 1 |

The reason for choosing this rounding rule is that it yields rounded scores that are close to the original ones, while being easy to read and understand

Some requirements build on others included in lower grades (i.e. they may be saying "As good plus..."). We decided that when such a requirement is met the previous one is not taken into account as that would distort results.

Finally, as mentioned earlier, ½ a point was detracted from the full scores for any incomplete or insufficient evidence provided.

As mentioned earlier, the final process for scoring DNO performance in addressing consumer vulnerability was subject to a trial-and-error approach along the duration of the process. In the next section we present alternative methodologies that we have taken into consideration.

We have decided to settle for this specific methodology because we believe that as a result of our analysis it is the approach that meets the characteristics needed while striking a good balance between level of details considered, consistency and simplicity.

Overview of alternative scoring methodologies

The 'Weight of Weights' Method

The method also uses weighted average to yield a numeric value attached to each DNO's performance. It was built as we recognise that computing a simple average of requirements fulfilled ('boxes ticked') weighted by numbers associated to each grade was not a fully detailed approach.

The reason for that is the *different number of requirements that make up each 'grade'*. For example, a DNO's partnership strategy may be deemed 'Excellent' as a result of two requirements fulfilled while it may be 'Fair' by fulfilling over 5 requirements. In order to integrate more detail in the scoring methodology each requirement fulfilled ('box ticked') was weighted by a number associated to each grade (as is the case in our final methodology) but was also weighted how many requirements it represents for each grade.

The advantage presented by this method is that it integrates more detail in scoring, on the other hand it is complex, places too much focus on the structure of the Sub-Criteria and yields a very similar result to the chosen methodology.

Example

- There are 5 requirements under the grade 'Weak' in Sub Criteria A.
- Giving a total 'weight' of 10 to the grade we determine that the 'weight' of a single requirement fulfilled under 'Weak' is 2.
- When computing the weighted average the number of 'Weak' requirements fulfilled is multiplied by 2 and by the number associated to the grade 'Weak'

The 'Point Based' Method

In developing this methodology we focused on simplicity. Each one of the five Sub-Criteria was determined to count 20 points in total. This allowed companies to get rated out of 100 points.

Allowing DNOs to be scored out of 100 allows for greater detail in *showing differences in performance without using decimal points* or other unclear measures. If a company fulfilled all of the requirements to be deemed as an excellent performer then it would achieve full 20 points in a given sub criteria.

Conversely, if it scored fully as a weak performer it would get 5 points on that sub criteria.

Recognising that distributors can show rather erratic performance throughout a given sub criteria, an uneven allocation of 'Weak', 'Fair', 'Good' and 'Excellent' scores was to be settled by means of a simple weighted average. The weights ranged from 5 for 'Weak' to 20 for 'Excellent' requirements with increments of 5.

The benefit of this method is that it is easy to understand, it can be easily used to compare performance and it shows a granular approach to performance. On the other hand, however, a vital drawback is that it is not consistent with the scoring guidelines provided by Ofgem and that it does not take into account the different number of requirements met under each score.

UK Power Networks - Scoring Sheet

| A : Strategic understanding and commitment to the role that network companies can play in tackling social issues relevant to vulnerable consumers | | | | |
|--|---|---|--|--|
| | Weak | Fair | Good | Excellent |
| <p>A1</p> <p>Understanding of the definition of vulnerable consumer.</p> <p>Awareness of the range of social issues.</p> | <ul style="list-style-type: none"> <input type="checkbox"/> Understanding of vulnerability restricted to general definition of vulnerability. <input type="checkbox"/> Little or no knowledge of what vulnerability looks like for the network company's consumer base. <input type="checkbox"/> General poor awareness of the social issues that vulnerable consumers face. | <ul style="list-style-type: none"> <input type="checkbox"/> Basic understanding of vulnerability across its consumer base. <input type="checkbox"/> Largely focussed on the key vulnerability characteristics. <input type="checkbox"/> Good awareness of the range of social issues associated with the industry relevant to vulnerable consumers in general. | <ul style="list-style-type: none"> ✓ Network Company aware that there isn't a 'one size fits all' approach to vulnerable consumers. ✓ Good understanding of the main 'vulnerability issues' facing its consumers ✓ Good awareness of the social issues associated with the industry that are most prevalent across its vulnerable cons. base. | <ul style="list-style-type: none"> ✓ Enough flexibility to adapt to differences in vulnerability and changing needs of vulnerable consumers. ✓ Network Company also thinking about issues external to the energy industry which could affect the vulnerability of consumers to energy issues or the utilisation of partner organisations. |
| <p>A2</p> <p>Recognition and integration of role in relation to social issues</p> | <ul style="list-style-type: none"> ✓ Recognition of social role confined to generalised statements. <input type="checkbox"/> Limited integration into overall business strategy. | <ul style="list-style-type: none"> <input type="checkbox"/> References to social role within strategy but tendency to treat as 'add on' aspects of business strategy and practices rather than integral aspects of service development and delivery. ✓ Limited used of targets to basic targets to improve performance and increase impact. | <ul style="list-style-type: none"> <input type="checkbox"/> Fully integrated understanding of social role with clear plans for developing systems and consumer-facing services to reflect role with targets for improved performance and increased impact. | <ul style="list-style-type: none"> <input type="checkbox"/> Delivering on social role a key business driver underpinning design, planning and delivery of all services with core objective to 'make the most of what the network company does' to tackle relevant social issues. <input type="checkbox"/> Network company has challenging targets to improve performance and increase impact |

| B: Engagement with stakeholders to improve the data and information that they hold on vulnerable consumers and what they do with it | | | | |
|--|---|---|---|--|
| | Weak | Fair | Good | Excellent |
| B1 Acquisition and Management | <ul style="list-style-type: none"> <input type="checkbox"/> No clear link between network company's stakeholder engagement programme and data acquisition strategy <input type="checkbox"/> Latter largely based on existing PSR and associated PSR 'recruitment' systems <input type="checkbox"/> Basic data and information management strategy in place but not always implemented. | <ul style="list-style-type: none"> ✓ Clear link between SE programme and the network company's data acquisition strategy, but the former is not fully utilised in the latter. ✓ Data and information management strategy an integral part of the network company's wider data and information strategies. <input type="checkbox"/> Evidence of good progress in keeping records up to date. <input type="checkbox"/> Awareness of data gaps and processes in place to address these. <input type="checkbox"/> Some consistency between data sources. | <ul style="list-style-type: none"> <input type="checkbox"/> SE programme is fully utilised in developing the network company's data acquisition strategy. ✓ Broad and inclusive range of stakeholders are engaged using a variety of appropriate mechanisms. <input type="checkbox"/> Data acquisition carried out by the network company in a timely and systematic way. ✓ Data and information updating strategies working very well. <input type="checkbox"/> Good progress in closing previously id'fied gaps. ✓ No data source consistency issues. | <ul style="list-style-type: none"> <input type="checkbox"/> As 'Good', plus Stakeholder Engagement programme includes challenging and hard-to-reach stakeholders, using mechanisms fully tailored to meet the needs of various stakeholder groups. |
| B2 Use | <ul style="list-style-type: none"> <input type="checkbox"/> Ad hoc use of data to enhance insight but no strategic approach to consumer insight to enable targeting work to address vulnerability and support social role. | <ul style="list-style-type: none"> <input type="checkbox"/> As 'Weak', plus basic systems in place to keep track of data use and some feedback to data acquisition and management strategies. | <ul style="list-style-type: none"> ✓ Clear evidence of data usage in improving service development and delivery. ✓ Extensive system of use checks across all data and information with evidence of a feedback loop to data acquisition and management strategies. | <ul style="list-style-type: none"> <input type="checkbox"/> As 'Good' plus using data to assess future risk of vulnerability and shape partnerships with other relevant organisations. <input type="checkbox"/> Clear strategy underlying the feedback loop to data acquisition and management strategies. |

C: Approach taken to management and use of PSR and associated services

| | Weak | Fair | Good | Excellent |
|--|---|--|---|---|
| <p>C1 Eligibility and take up of the PSR</p> | <ul style="list-style-type: none"> <input type="checkbox"/> Eligibility for the PSR is largely confined to the “core” eligible groups defined by Ofgem. <input type="checkbox"/> Basic reactive PSR recruitment programme by the consumer-facing services team when contact with a consumer is made who displays possible vulnerable circumstances. | <ul style="list-style-type: none"> <input type="checkbox"/> Well-managed PSR list with some evidence of strategic approach to eligibility outside of the “core” groups. <input type="checkbox"/> Basic advertising of the PSR and the services offered, e.g. posters and leaflets, in key locations linked to vulnerable consumers, e.g. doctors’ surgeries. | <ul style="list-style-type: none"> √ Informed by good data analysis, Network Company is proactively identifying vulnerable consumers outside of the “core” groups, fully reflecting fact that vulnerability can be complex and multidimensional. √ Targeted advertising of the PSR and the services offered to vulnerable consumer groups. | <ul style="list-style-type: none"> √ As ‘good’ plus approach reflects fact that vulnerability may be transitory, providing options for temporary access to PSR and ensuring that those consumers who are no longer eligible (due to temporary nature of their vulnerability) are taken off the PSR list. √ Extensive PSR recruitment programme, drawing on data and information sources to proactively identify and contact eligible consumers. |
| <p>C2 Services offered to consumers on the PSR</p> | <ul style="list-style-type: none"> <input type="checkbox"/> PSR services are restricted to the minimum list of services defined by Ofgem. | <ul style="list-style-type: none"> √ Limited additional services offered with some links to the needs of the “core” eligible groups. √ Network company able to provide basic justification of the practicality of offering these services and how they ‘add value’ for these groups of consumers. | <ul style="list-style-type: none"> <input type="checkbox"/> A wide range of additional services offered that clearly reflect the specific needs of the “core” eligible groups of consumers. <input type="checkbox"/> Detailed analysis of need undertaken which demonstrates how these services reflect the complex and multidimensional nature of vulnerability. – Some additional services also offered for PSR consumers outside of these “core” eligible groups. | <ul style="list-style-type: none"> <input type="checkbox"/> A full range of additional services developed according to detailed needs analysis of all PSR consumers and the nature of their vulnerability. Approach also reflects the fact that vulnerability may be transitory. <input type="checkbox"/> Full justification for how these services add value to the associated group of PSR consumers. |

| D: Approach taken to develop and utilise partnerships (e.g. referral networks) to identify and deliver solutions (both energy and non-energy) for vulnerable consumers | | | | |
|---|--|---|---|--|
| | Weak | Fair | Good | Excellent |
| D1 Overall partnership strategy | <ul style="list-style-type: none"> <input type="checkbox"/> Some links with other services for vulnerable consumers and partnerships to improve cross-referrals, and some participation in referral networks in area when invited. However, no clear strategy. | <ul style="list-style-type: none"> – Clear strategy towards developing partnerships with relevant organisations, including ideas about what can be achieved from these partnerships in relation to the identification of vulnerable consumers, and identification and delivery of solutions. | <ul style="list-style-type: none"> <input type="checkbox"/> Clear strategy towards both developing partnerships with relevant organisations and how to utilise these partnerships when they are in place. ✓ Strategy informed by evidence of benefits of existing partnerships on vulnerable consumers. | <ul style="list-style-type: none"> <input type="checkbox"/> As good, plus fully utilising existing partnerships. <input type="checkbox"/> Network company aware of the limitations of existing partnerships and the wider limitations on the network company in relation to expanding those partnerships. <input type="checkbox"/> Partnership strategy includes plans to overcome limitations, where possible. |
| D2 Developing partnerships | <ul style="list-style-type: none"> <input type="checkbox"/> Participation in partnerships with a limited range of organisation types, largely within the utility sector. <input type="checkbox"/> Partnerships provided limited support for the “core” groups of vulnerable consumers. | <ul style="list-style-type: none"> <input type="checkbox"/> Wide range of partnerships extending beyond the utility sector. ✓ Partnerships provide some support to most groups of vulnerable consumers. | <ul style="list-style-type: none"> ✓ Extensive range of partnerships, with a wide variety of organisation types. <input type="checkbox"/> Partnerships provide full and effective support for all groups of vulnerable consumers. | |
| D3 Utilising partnerships | <ul style="list-style-type: none"> <input type="checkbox"/> Partnerships largely restricted to referral and signposting. | <ul style="list-style-type: none"> <input type="checkbox"/> Partnerships utilise data and information flows where appropriate, but these flows are largely one-sided and can be infrequent. | <ul style="list-style-type: none"> ✓ Network company has leading role in the partnerships that it has developed, working together to identify vulnerable consumers and solutions. | <ul style="list-style-type: none"> <input type="checkbox"/> As ‘good’, but network company is utilising these partnerships in an effective way to also deliver solutions without creating unnecessary work for the network company. |

| E: Embedding their strategy for addressing consumer vulnerability in their systems, processes and how they manage consumer interactions | | | | |
|--|---|--|--|---|
| | Weak | Fair | Good | Excellent |
| E2 Embedding strategy general systems and processes and awareness of impact and effectiveness of actions. | <ul style="list-style-type: none"> <input type="checkbox"/> Basic reflection of network company's role into general systems and processes throughout the business. <input type="checkbox"/> Very little information therefore provided from consumer-facing services to other business systems and processes. <input type="checkbox"/> Network company able to provide little justification as to why its chosen actions address social issues relevant to vulnerable consumers. | <ul style="list-style-type: none"> ✓ Clear feedback loop, with the information captured on consumer needs and vulnerabilities being reflected in network company's stakeholder engagement strategy, work around the PSR, and its partnership strategy. ✓ Network company able to provide basic justification as to why its chosen actions address social issues relevant to vulnerable consumers. – Basic understanding of any areas where it is currently falling short and could improve its performance. <input type="checkbox"/> Lack of clarity around plans to address shortcoming and/or barriers to performance improvement. | <ul style="list-style-type: none"> <input type="checkbox"/> As 'fair', plus services routinely monitored and evaluated to test extent to which they are meeting consumer needs. <input type="checkbox"/> Feeds into wider service design and other general systems and processes throughout the business. ✓ Full senior management buy-in to the network company's strategy in this area. <input type="checkbox"/> Network company provides more justification than "Fair", but is not able to fully justify why its chosen actions address social issues relevant to vulnerable consumers. <input type="checkbox"/> Network company has clear plans to address shortcomings and/or barriers to performance improvement it is currently facing. | <ul style="list-style-type: none"> <input type="checkbox"/> High level of integration of the network company's role into general systems and processes throughout the business. <input type="checkbox"/> Very clear feedback loop between the monitoring and evaluation of services by the consumer-facing teams to the overall strategy in relation to social issues relevant to vulnerable consumers. <input type="checkbox"/> Evaluation not restricted to retrospective assessment of activities or quantitative assessment of activities. <input type="checkbox"/> As 'Good', plus network company able to fully justify why its chosen actions address social issues relevant to vulnerable consumers and demonstrate why these 'add value' and are more effective over alternatives. |
| E1 Embedding strategy in managing consumer interactions | <ul style="list-style-type: none"> <input type="checkbox"/> Consumer-facing services and associated processes show only a basic reflection of the network company's social role. <input type="checkbox"/> They do not focus on capturing information to identify vulnerabilities beyond basic PSR recruitment. | <ul style="list-style-type: none"> <input type="checkbox"/> Consumer-facing services routinely capturing information on consumer needs and vulnerabilities to support tailoring of PSR services and work with partners for further support to limited range of services delivered by others. | <ul style="list-style-type: none"> ✓ Consumer service staff trained in identifying and responding to consumer vulnerabilities with a range of network company and partner services, selected to meet wide range of consumer needs and circumstances | <ul style="list-style-type: none"> ✓ As 'good' with social role a key aspect of consumer services and front-line staff training and service design, with all front-line staff trained to identify and record consumer vulnerability with access to a wide range of responses developed and available to support consumers. ✓ Evidence that staff have the flexibility available to 'do right thing' for any consumer and are empowered to focus on areas where they can be most effective. |

Ofgem Reference Scoring Points

| Weak | Fair | Good | Excellent |
|---------|------|------|-----------|
| Below 6 | 6-7 | 8 | 9-10 |

Final Assessment of UK Power Networks's Performance

| SECV Sub-Criteria | Score | Mark |
|-------------------|--------|------|
| A | 8/10 | Good |
| B | 8/10 | Good |
| C | 8/10 | Good |
| D | 7.5/10 | Fair |
| E | 7.5/10 | Fair |

Evidence-based Review

Sub Criteria A – Strategic understanding and commitment to the role that network companies can play in tackling social issues relevant to vulnerable consumers

Network Company aware that there isn't a 'one size fits all' approach to vulnerable consumers

- They recognise that “vulnerability can be due to a wide variety of reasons ... some transient”. In the grounds for vulnerability, they include two temporary reasons and two permanent non-core reasons.
- UK Power Networks includes more than the core Ofgem requirements in their definition of vulnerable customers; they include consumers with mental issues, those dependent on medical equipment. They also recognise that it can be transient by including having young children at home and recuperating from treatment as vulnerability criteria.

Good understanding of the main vulnerability issues facing its consumers

- “Last year we received feedback from customers that our service could be improved to cater for deaf and hard of hearing customers.” They understand that 3m people, in the area they serve, suffer some form of hearing loss.
- When inquired about their strong focus on Fuel Poverty UK Power Networks stated that they had made this choice based on various engagements. Face to face feedback from customers recorded at charity events (i.e. with Age UK and Alzheimer’s Society), as a result of research commissioned and as a result of feedback from stakeholder engagement activities (9 Critical Friends Panels) and resilience partners (i.e. West Sussex Fire and Rescue Service event).

Good awareness of the social issues associated with the industry that are most prevalent across its vulnerable consumer base

- Invested in a major research study with over 1000 hard-to-reach customers in rural and coastal areas to understand their specific social issues. They interviewed ethnic minority groups that are traditionally hard-to-reach by partnering with London Sustainability Exchange.
- “...talked to over 100 customers face to face, and they told us loud and clear that their energy bills and energy costs, in general, worried them, and 70% said they would appreciate receiving advice from us on how to manage their energy costs”. As a result, they co-designed “you and your home” service through face-to-face contact.

Network company also thinking about issues external to the energy industry which could affect the vulnerability of consumers to energy issues or the utilisation of partner organisations.

- UK Power Networks understood that “social issues ... were that our non-English speaking customers rely on support networks in their neighbourhood during power cuts as well as religious communities.” They understood how this could impact communication and acted upon it.

Limited use of targets to basic targets to improve performance and increase impact

- While UK Power Networks do state that their aim is to become the best distribution company by 2018/19, they do not highlight specific drawbacks or plans to address this objective.

- When asked about this issue during our site visit we were told that they would focus on vulnerable customer satisfaction, the percentage of vulnerable customers contacted during a power outage and rate of PSR data cleaned each year; this represents more information on particular metrics followed but does not lay out a specific roadmap to reach targets.

Recognition of social role confined to generalised statements

- There is no particular reference to the social role played by UK Power Networks as an electricity distributor. They do mention that it is a priority for them to address fuel poverty but does not focus on its role as being able to address wider social issues.
- During the visit to UK Power Network Ipswich Offices, we touched upon various social issues and felt that the company understands their role. However, we based this assessment exclusively on what was provided in the Part 3 SECV Submission and on what we asked during that visit specifically related to our pre-defined questions.

Enough flexibility to adapt to differences in vulnerability and changing needs of vulnerable consumers

- “Anyone who considers themselves to be vulnerable is eligible for inclusion because we know that vulnerability is complex and difficult to categorise.”
- During the site visit, UK Power Networks has told us that they define vulnerability using 21 categories ranging from Blind to Elderly to specific medical equipment operated on electricity.
- We believe that UK Power Networks shows a good understanding of the variety of consumer vulnerability issues, but that it does not reflect the same level of flexibility from an operational standpoint.

Sub Criteria B – Engagement with Stakeholders to improve the data and information that they hold on vulnerable consumers and what they do with it

Clear link between Stakeholder Engagement programme and the network company’s data acquisition strategy, but the former is not fully utilised in the latter.

- The case for a new CRM system, which gives the opportunity to improve the acquisition and management of data, is framed in a PSR oriented fashion “We now have increased confidence in the accuracy of our vulnerable customer data, as our PSR database is no longer a standalone system – it is fully integrated with our CRM so we can dynamically update customers’ records”
- Site visit discussions led us to understand that UK Power Networks chose to “compliment data cleanse with updates during interactions”. This approach was the result of an internal analysis of different options.

Data and information management strategy an integral part of the network company’s wider data and information strategies

- “Increased accuracy of vulnerable customer data. The PSR database is fully integrated with CRM, so it is easier to keep track of conditions such as temporary vulnerability.”

Data and information updating strategies are working very well.

- “100% of records cleansed “
- “Data enriched by the addition of over 390,000 additional items of information.”
- “Over 800,000 customer mobile and landline records checked to ensure they are accurate.”

Clear evidence of data usage in improving service development and delivery

- They developed a consumer vulnerability map in their region centred on existing data on which they based various decisions of their Stakeholder Engagement Strategy. They hosted eight energy efficiency workshops, five “Caring for Customers” events to promote a PSR focus group on vulnerable customers and market research zones based on it.
- During the site visit the company provided evidence of how the newly established CRM system helps them to target vulnerable customers and improve service delivery.

Extensive system of use checks across all data and information with evidence of a feedback loop to data acquisition and management strategies.

- “Our data and information strategy was developed using direct stakeholder feedback.”
- Proactivity in cleansing databases by checking against the national register of deaths and telephone number records. PSR and Network control system updated together so that operational teams have immediate visibility of all known vulnerable customers.
- Evidence was provided as part of the site visit discussions showing that the data acquisition and management strategy was based on the feedback gained from organisations which represent vulnerable customers, Critical Friends Panels.

No data source consistency issue.

- During the site visit the company has highlighted that they use a mix of nine different sources of data. The newly established CRM tool gathers various sources of data and ensures their consistency.

Sub Criteria C – Approach taken to management and use of PSR and associated services Informed by good data analysis, Network Company is proactively identifying vulnerable consumers outside of the “core” groups, fully reflecting fact that vulnerability can be complex and multidimensional.

- “Following initial work with National Energy Action, we carried out detailed work to understand the variation of vulnerability across our region. We identified where we were likely to find higher levels of vulnerability in its various forms.”
- Site visit discussions pointed that the newly established CRM will provide a new way to monitor and track behaviours and interactions with PSR customers enabling to provide a better fit for targeted activities.

Targeted advertising of the PSR and the services offered to vulnerable consumer groups.

- Customer service team spoke to customers and had face-to-face meetings at two Age UK coffee mornings, two Alzheimer’s Society “Dementia café” events and a British Lung Foundation coffee meeting. They signed up 70 customers to the PSR at these meetings. This shows pro-active PSR recruitment.
- “Contacted Parishes to promote and recruit vulnerable customers on PSR, either door-to-door or at community events such as coffee mornings”. They base this on a trial which has proven that face-to-face engagement produces the highest sign up rates.
- “Made contact with every single council this year to help build the number of customers on PSR. 15000 leaflets sent out and 3.9m households received information.”
- “Set up pilot project with Carers Trust to sign up hard-to-reach groups on PSR. Targeted deprived areas.”

- “Caring for Customer and initiative to reach wider audiences to promote the PSR in vulnerable areas identified through their map. 15,000 new people signed up to the PSR, awareness of UK Power Networks services in this geographic area increased by 3%.”

As ‘good’ plus approach reflects fact that vulnerability may be transitory, providing options for temporary access to PSR and ensuring that those consumers who are no longer eligible (due to temporary nature of their vulnerability) are taken off the PSR list.

- “We know vulnerability can be temporary in nature, for example, when a customer is recovering at home after hospital treatment or when a new baby is in the household. Our CRM system enables us to add temporary records to any customer likely to be vulnerable during a power cut during a limited period (e.g. a week, two months, a year).”
- UK Power Networks provided evidence that they have ways to ensure that customers no longer eligible for PSR list are removed when appropriate.

Extensive PSR recruitment programme drawing on data and info sources to proactively identify and contact eligible consumers.

- There is evidence throughout the submission that UK Power Networks has made extensive use of data and partnerships to target, identify and recruit a broad range of vulnerable consumers. Examples are parish councils and the “Caring for Customers” recruitment programme.

Limited additional services offered with some links to the needs of the “core” eligible groups.

- There is no reference to a “baseline” or standard list of services provided on the PSR, but we assume they provide those minimum services mandated by Ofgem. Throughout the submission UK Power Networks mentions various services offered along with partner organisations, such as the British Red Cross. There is no evidence as to how services clearly reflect specific needs.
- Particular reference is made on the submission regarding three additional services: the provision of emergency boxes, customer and community support team and newly developed app for non-English speakers.

Network company able to provide basic justification of the practicality of offering these services and how they ‘add value’ for these groups of consumers.

- “ A box of useful items such as a torch, sticker showing the emergency telephone number and an analogue phone that works during a power cut... we wanted to make sure our customers still found these items useful and ask if they wanted anything else included...”
- We then discussed this at our cross-utility working group, vulnerable customer partner group and critical friends panels and agreed that the new boxes would include practical tools from other utilities.”
- “Our research with harder to reach audiences showed that during a power cut, rural and coastal customers, compared to urban customers, want regular updates, reassurance as well as hands-on support.”

Some additional services also offered for PSR consumers outside of “core” eligible groups.

[HALF POINT]

- UK Power Network told us that some other services are offered to consumers outside of basic groups. For instance, the Customer and Community support team is set to benefit all customers.
- Half a point was awarded because some of these additional services are not sufficiently established to this point. [i.e. the App for non-English speaking customers in its trial period].

- Furthermore, there was no evidence that these additional services were assessed against other options.
- The company did state, however, that the design of services was supported by feedback from vulnerable customers and partners.

Sub Criteria D – Approach taken to develop and utilise partnerships to identify and deliver solutions for vulnerable consumers

Clear strategy towards developing partnerships with relevant organisations, including ideas about what can be achieved from these partnerships in relation to the identification of vulnerable consumers, and identification and delivery of solutions. [HALF POINT]

- Rather than a strategy, UK Power Networks lists a set of fundamental principles on which to base their choice of companies and institutions with whom to partner. For this reason, they were awarded half point.
- “...we also see the huge benefit in partnering with companies outside the industry to offer different levels of expertise to our customers.”
- No mention to how partnerships can be used when in place.

Strategy informed by evidence of benefits of existing partnerships on vulnerable consumers

- “Delivered eight workshops with five housing associations based on the lesson that partnering with social housing bodies is an effective way of reaching fuel poor customers.”
- “...for the first time we held a Partners Forum aimed at organisations specialising in supporting those who are also our vulnerable customers ... Discussion topics included sharing best practice in terms of how we work with the British Red Cross, how we can work better together with new/existing partners to support vulnerable customers and sharing our market research results about hard-to-reach groups.”

Extensive range of partnerships with a wide variety of organisation types

- As shown on page 9 of their submission, UK Power Networks partners with a broad range of companies and institutions both inside and outside of the energy industry. The list ranges from utilities to parish councils and local councils to consumer focus groups and institutions such as the British Red Cross.

Partnerships provide some support to most groups of vulnerable consumers

- While some partnerships, like those with RAD and Action on Hearing Loss, deliver useful results for deaf and hard of hearing customers, there is no evidence that partnerships offer support to *all* groups of vulnerable consumers.
- Worked on the “You and your home” service in partnership with Citizens Advice. They chose them because they are the most well-known brand. Citizen Advice representatives call or visit the customers to talk through their circumstances and offer tailored advice.
- “Partnered with Groundwork Hertfordshire to provide energy advice to vulnerable households saving a total of 7250 per year.”

Network Company has leading role in the partnerships that it has developed working together to identify vulnerable consumers and solutions.

- Citizen Advice said “UK Power Networks understands what the social circumstances are...they initially reached out to us”. We regarded this point as showing leadership in developing a partnership.

- We found evidence, in the submission of the company's work to support deaf and hard of hearing customers.

Sub Criteria E – Embedding their strategy for addressing consumer vulnerability in their systems, processes and how they manage interactions

Clear feedback loop, with the information captured on consumer needs and vulnerabilities being reflected in network company's stakeholder engagement strategy, work around the PSR, and its partnership strategy.

- Throughout the submission, the company has shown various examples where the feedback gathered from vulnerable consumers, as a result of a range of activities, informed the company's stakeholder engagement strategy.
- Examples range from the content of emergency boxes to the way they adapted marketing material for deaf and hard of hearing customers.

Network Company able to provide basic justification as to why its chosen actions address social issues relevant to vulnerable consumers.

- We have found evidence in the submission highlighting some practical benefits to vulnerable consumers as a result of the actions chosen by UK Power Networks.
- Examples include benefits for deaf and hard of hearing customers as a result of new outreach material tailored to them, help delivered through energy efficiency workshops tackling fuel poverty (in terms of pound per customer saved).

Full senior management buy-in to the network company's strategy in this area.

- Executive management team took part to sensibility training designed by Age UK as well. As a result of this training, they adapted literature that is hard to read for customers with eyesight disabilities.
- The latter point also shows a feedback loop between information and action geared towards vulnerable consumers.
- During the site visit we were provided with further evidence that Senior Management attended various events focused on consumer vulnerability, they mentioned 20 events and explained some of them in detail (i.e. Senior leaders visiting customers to resolve vulnerable customer complaints)

Consumer service staff trained in identifying and responding to consumer vulnerabilities with a range of network company and partner services, selected to meet wide range of consumer needs and circumstances.

- Embedded training programme for over 1000 employees trained on consumer vulnerability. Employees trained to offer support to call centre when they receive calls and are now equipped with the skills to identify vulnerable customers.

As 'good' with social role a key aspect of consumer services and front-line staff training and service design, with all front-line staff trained to identify and record consumer vulnerability with access to a wide range of responses developed and available to support consumers.

- Customer-facing staff are empowered and have the flexibility to do what they believe is best when offering a service to customers. They have put in place a process which authorises relevant managers to pay for food, book hotels or offer a gesture of goodwill as appropriate.
- We were provided with evidence during the site visit showing different training schemes for tailored to different staff members.

- Examples include the Sensory Training for all front line call advisors and senior management and the Good 2 Great training for all field staff including all contractors.
- We were satisfied that this type of training empowers staff with a broad range of responses coupled with the ability to detect and sensibility to address consumer vulnerability of various nature.

Evidence that staff have the flexibility available to ‘do right thing’ for any consumer and are empowered to focus on areas where they can be most effective.

- After understanding that service could be improved to cater for deaf and hard of hearing customers they strengthened their offering to these vulnerable customers. They have developed training policies and communication channels which mean an improved service is offered to deaf and hard of hearing customers.
- UK Power Networks highlighted that all service staff is fully responsible, capable and has the flexibility to meet vulnerable customer’s needs.

Basic understanding of any areas where it is currently falling short and could improve its performance. [HALF POINT]

- They acknowledged that they could strengthen the knowledge about hard-to-reach communities in rural or coastal regions and acted upon it with 1000 hard-to-reach customer studies. Set up a customer community support team in rural and coastal areas, launched a new mobile app for non-English speaking customers
- The half point was awarded given that these are areas that are already being addressed and that there is no evidence of further goals to improve specific performance areas. Furthermore, while highly welcomed, these initiatives address only a fraction of the PSR population.

SSEPD - Scoring Sheet

| A : Strategic understanding and commitment to the role that network companies can play in tackling social issues relevant to vulnerable consumers | | | | |
|--|---|---|---|--|
| | Weak | Fair | Good | Excellent |
| <p>A1</p> <p>Understanding of the definition of vulnerable consumer.</p> <p>Awareness of the range of social issues.</p> | <ul style="list-style-type: none"> <input type="checkbox"/> Understanding of vulnerability restricted to general definition of vulnerability. <input type="checkbox"/> Little or no knowledge of what vulnerability looks like for the network company's consumer base. <input type="checkbox"/> General poor awareness of the social issues that vulnerable consumers face. | <ul style="list-style-type: none"> <input type="checkbox"/> Basic understanding of vulnerability across its consumer base. <input type="checkbox"/> Largely focussed on the key vulnerability characteristics. <input type="checkbox"/> Good awareness of the range of social issues associated with the industry relevant to vulnerable consumers in general. | <ul style="list-style-type: none"> √ Network Company aware that there isn't a 'one size fits all' approach to vulnerable consumers. – Good understanding of the main 'vulnerability issues' facing its consumers <input type="checkbox"/> Good awareness of the social issues associated with the industry that are most prevalent across its vulnerable cons. base. | <ul style="list-style-type: none"> √ Enough flexibility to adapt to differences in vulnerability and changing needs of vulnerable consumers. √ Network Company also thinking about issues external to the energy industry which could affect the vulnerability of consumers to energy issues or the utilisation of partner organisations. |
| <p>A2</p> <p>Recognition and integration of role in relation to social issues</p> | <ul style="list-style-type: none"> <input type="checkbox"/> Recognition of social role confined to generalised statements. <input type="checkbox"/> Limited integration into overall business strategy. | <ul style="list-style-type: none"> <input type="checkbox"/> References to social role within strategy but tendency to treat as 'add on' aspects of business strategy and practices rather than integral aspects of service development and delivery. <input type="checkbox"/> Limited used of targets to basic targets to improve performance and increase impact. | <ul style="list-style-type: none"> – Fully integrated understanding of social role with clear plans for developing systems and consumer-facing services to reflect role with targets for improved performance and increased impact. | <ul style="list-style-type: none"> <input type="checkbox"/> Delivering on social role a key business driver underpinning design, planning and delivery of all services with core objective to 'make the most of what the network company does' to tackle relevant social issues. <input type="checkbox"/> Network company has challenging targets to improve performance and increase impact |

| B: Engagement with stakeholders to improve the data and information that they hold on vulnerable consumers and what they do with it | | | | |
|--|---|--|--|--|
| | Weak | Fair | Good | Excellent |
| B1 Acquisition and Management | <ul style="list-style-type: none"> <input type="checkbox"/> No clear link between network company's stakeholder engagement programme and data acquisition strategy <input type="checkbox"/> Latter largely based on existing PSR and associated PSR 'recruitment' systems <input type="checkbox"/> Basic data and information management strategy in place but not always implemented. | <ul style="list-style-type: none"> ✓ Clear link between SE programme and the network company's data acquisition strategy, but the former is not fully utilised in the latter. <input type="checkbox"/> Data and information management strategy an integral part of the network company's wider data and information strategies. <input type="checkbox"/> Evidence of good progress in keeping records up to date. <input type="checkbox"/> Awareness of data gaps and processes in place to address these. <input type="checkbox"/> Some consistency between data sources. | <ul style="list-style-type: none"> <input type="checkbox"/> SE programme is fully utilised in developing the network company's data acquisition strategy. ✓ Broad and inclusive range of stakeholders are engaged using a variety of appropriate mechanisms. <input type="checkbox"/> Data acquisition carried out by the network company in a timely and systematic way. ✓ Data and information updating strategies working very well.. ✓ Good progress in closing previously id'fied gaps. <input type="checkbox"/> No data source consistency issues. | <ul style="list-style-type: none"> ✓ As 'Good', plus Stakeholder Engagement programme includes challenging and hard-to-reach stakeholders, using mechanisms fully tailored to meet the needs of various stakeholder groups. |
| B2 Use | <ul style="list-style-type: none"> <input type="checkbox"/> Ad hoc use of data to enhance insight but no strategic approach to consumer insight to enable targeting work to address vulnerability and support social role. | <ul style="list-style-type: none"> <input type="checkbox"/> As 'Weak', plus basic systems in place to keep track of data use and some feedback to data acquisition and management strategies. | <ul style="list-style-type: none"> – Clear evidence of data usage in improving service development and delivery. – Extensive system of use checks across all data and information with evidence of a feedback loop to data acquisition and management strategies. | <ul style="list-style-type: none"> <input type="checkbox"/> As 'Good' plus using data to assess future risk of vulnerability and shape partnerships with other relevant organisations. <input type="checkbox"/> Clear strategy underlying the feedback loop to data acquisition and management strategies. |

C: Approach taken to management and use of PSR and associated services

| | Weak | Fair | Good | Excellent |
|--|---|--|--|--|
| <p>C1 Eligibility and take up of the PSR</p> | <ul style="list-style-type: none"> <input type="checkbox"/> Eligibility for the PSR is largely confined to the “core” eligible groups defined by Ofgem. <input type="checkbox"/> Basic reactive PSR recruitment programme by the consumer-facing services team when contact with a consumer is made who displays possible vulnerable circumstances. | <ul style="list-style-type: none"> <input type="checkbox"/> Well-managed PSR list with some evidence of strategic approach to eligibility outside of the “core” groups. <input type="checkbox"/> Basic advertising of the PSR and the services offered, e.g. posters and leaflets, in key locations linked to vulnerable consumers, e.g. doctors’ surgeries. | <ul style="list-style-type: none"> – Informed by good data analysis, Network Company is proactively identifying vulnerable consumers outside of the “core” groups, fully reflecting fact that vulnerability can be complex and multidimensional. ✓ Targeted advertising of the PSR and the services offered to vulnerable consumer groups. | <ul style="list-style-type: none"> ✓ As ‘good’ plus approach reflects fact that vulnerability may be transitory, providing options for temporary access to PSR and ensuring that those consumers who are no longer eligible (due to temporary nature of their vulnerability) are taken off the PSR list. <input type="checkbox"/> Extensive PSR recruitment programme, drawing on data and information sources to proactively identify and contact eligible consumers. |
| <p>C2 Services offered to consumers on the PSR</p> | <ul style="list-style-type: none"> <input type="checkbox"/> PSR services are restricted to the minimum list of services defined by Ofgem. | <ul style="list-style-type: none"> <input type="checkbox"/> Limited additional services offered with some links to the needs of the “core” eligible groups. ✓ Network company able to provide basic justification of the practicality of offering these services and how they ‘add value’ for these groups of consumers. | <ul style="list-style-type: none"> ✓ A wide range of additional services offered that clearly reflect the specific needs of the “core” eligible groups of consumers. <input type="checkbox"/> Detailed analysis of need undertaken which demonstrates how these services reflect the complex and multidimensional nature of vulnerability. ✓ Some additional services also offered for PSR consumers outside of these “core” eligible groups. | <ul style="list-style-type: none"> <input type="checkbox"/> A full range of additional services developed according to detailed needs analysis of all PSR consumers and the nature of their vulnerability. Approach also reflects the fact that vulnerability may be transitory. <input type="checkbox"/> Full justification for how these services add value to the associated group of PSR consumers. |

| D: Approach taken to develop and utilise partnerships (e.g. referral networks) to identify and deliver solutions (both energy and non-energy) for vulnerable consumers | | | | |
|---|--|---|--|---|
| | Weak | Fair | Good | Excellent |
| D1 Overall partnership strategy | <ul style="list-style-type: none"> √ Some links with other services for vulnerable consumers and partnerships to improve cross referrals, and some participation in referral networks in area when invited. However, no clear strategy. | <ul style="list-style-type: none"> □ Clear strategy towards developing partnerships with relevant organisations, including ideas about what can be achieved from these partnerships in relation to the identification of vulnerable consumers, and identification and delivery of solutions. | <ul style="list-style-type: none"> □ Clear strategy towards both developing partnerships with relevant organisations and how to utilise these partnerships when they are in place. √ Strategy informed by evidence of benefits of existing partnerships on vulnerable consumers. | <ul style="list-style-type: none"> □ As good, plus fully utilising existing partnerships. □ Network company aware of the limitations of existing partnerships and the wider limitations on the network company in relation to expanding those partnerships. □ Partnership strategy includes plans to overcome limitations, where possible. |
| D2 Developing partnerships | <ul style="list-style-type: none"> □ Participation in partnerships with a limited range of organisation types, largely within the utility sector. □ Partnerships provided limited support for the “core” groups of vulnerable consumers. | <ul style="list-style-type: none"> □ Wide range of partnerships extending beyond the utility sector. √ Partnerships provide some support to most groups of vulnerable consumers. | <ul style="list-style-type: none"> √ Extensive range of partnerships, with a wide variety of organisation types. □ Partnerships provide full and effective support for all groups of vulnerable consumers. | |
| D3 Utilising partnerships | <ul style="list-style-type: none"> □ Partnerships largely restricted to referral and signposting. | <ul style="list-style-type: none"> □ Partnerships utilise data and information flows where appropriate, but these flows are largely one-sided and can be infrequent. | <ul style="list-style-type: none"> √ Network company has leading role in the partnerships that it has developed, working together to identify vulnerable consumers and solutions. | <ul style="list-style-type: none"> – As ‘good’, but network company is utilising these partnerships in an effective way to also deliver solutions without creating unnecessary work for the network company. |

| E: Embedding their strategy for addressing consumer vulnerability in their systems, processes and how they manage consumer interactions | | | | |
|--|---|---|--|---|
| | Weak | Fair | Good | Excellent |
| <p>E2 Embedding strategy general systems and processes and awareness of impact and effectiveness of actions.</p> | <ul style="list-style-type: none"> <input type="checkbox"/> Basic reflection of network company's role into general systems and processes throughout the business. <input type="checkbox"/> Very little information therefore provided from consumer facing services to other business systems and processes. <input type="checkbox"/> Network company able to provide little justification as to why its chosen actions address social issues relevant to vulnerable consumers. | <ul style="list-style-type: none"> ✓ Clear feedback loop, with the information captured on consumer needs and vulnerabilities being reflected in network company's stakeholder engagement strategy, work around the PSR, and its partnership strategy. ✓ Network company able to provide basic justification as to why its chosen actions address social issues relevant to vulnerable consumers. ✓ Basic understanding of any areas where it is currently falling short and could improve its performance. ✓ Lack of clarity around plans to address shortcoming and/or barriers to performance improvement. | <ul style="list-style-type: none"> <input type="checkbox"/> As 'fair', plus services routinely monitored and evaluated to test extent to which they are meeting consumer needs. <input type="checkbox"/> Feeds into wider service design and other general systems and processes throughout the business. <input type="checkbox"/> Full senior management buy-in to the network company's strategy in this area. ✓ Network company provides more justification than "Fair", but is not able to fully justify why its chosen actions address social issues relevant to vulnerable consumers. <input type="checkbox"/> Network company has clear plans to address shortcomings and/or barriers to performance improvement it is currently facing. | <ul style="list-style-type: none"> <input type="checkbox"/> High level of integration of the network company's role into general systems and processes throughout the business. <input type="checkbox"/> Very clear feedback loop between the monitoring and evaluation of services by the consumer-facing teams to the overall strategy in relation to social issues relevant to vulnerable consumers. <input type="checkbox"/> Evaluation not restricted to retrospective assessment of activities or quantitative assessment of activities. <input type="checkbox"/> As 'Good', plus network company able to fully justify why its chosen actions address social issues relevant to vulnerable consumers and demonstrate why these 'add value' and are more effective over alternatives. |
| <p>E1 Embedding strategy in managing consumer interactions</p> | <ul style="list-style-type: none"> <input type="checkbox"/> Consumer-facing services and associated processes show only a basic reflection of the network company's social role. <input type="checkbox"/> They do not focus on capturing information to identify vulnerabilities beyond basic PSR recruitment. | <ul style="list-style-type: none"> <input type="checkbox"/> Consumer-facing services routinely capturing information on consumer needs and vulnerabilities to support tailoring of PSR services and work with partners for further support to limited range of services delivered by others. | <ul style="list-style-type: none"> ✓ Consumer service staff trained in identifying and responding to consumer vulnerabilities with a range of network company and partner services, selected to meet wide range of consumer needs and circumstances | <ul style="list-style-type: none"> ✓ As 'good' with social role a key aspect of consumer services and front-line staff training and service design, with all front-line staff trained to identify and record consumer vulnerability with access to a wide range of responses developed and available to support consumers. ✓ Evidence that staff have the flexibility available to 'do right thing' for any consumer and are empowered to focus on areas where they can be most effective. |

Ofgem Reference Scoring Points

| Weak | Fair | Good | Excellent |
|-------------|-------------|-------------|------------------|
| Below 6 | 6-7 | 8 | 9-10 |

Final Assessment of SSEPD Performance

| SECV Sub-Criteria | Score | Mark |
|--------------------------|--------------|-------------|
| A | 8/10 | Good |
| B | 7.5/10 | Fair |
| C | 8/10 | Good |
| D | 7.5/10 | Fair |
| E | 8/10 | Good |

Evidence-based Review

Sub Criteria A – Strategic understanding and commitment to the role that network companies can play in tackling social issues relevant to vulnerable consumers

Enough flexibility to adapt to differences in vulnerability and changing needs of vulnerable consumers.

- “... we are able to adapt to the changing circumstances that real life throws at people...”
- “... we have changed our terminology from vulnerable consumers to consumers in vulnerable positions... reflects the fact that anyone can become vulnerable at any time due to their personal characteristics or circumstances or a combination of both”
- “... individuals who can sometimes find themselves in a vulnerable position at any time as a result of circumstance, external or personal.”

Network Company also thinking about issues external to the energy industry which could affect the vulnerability of consumers to energy issues or the utilisation of partner organisations.

- “... ability to cope with sudden life events such as bereavement, relationship breakdown, or sudden illness.”
- SSEPD also mentions, fuel poverty, household debt, working poor, illiteracy, multiple morbidity health problems as social issues affect its vulnerable consumers. This highlights a focus on matters also outside the energy industry.
- While SSEPD shows a good understanding of social problems, we have not found evidence that they have gone further to predict how it might impact vulnerability and the utilisation of partner organisations.

Fully integrated understanding of social role with clear plans for developing systems and consumer-facing services to reflect role with targets for improved performance and increased impact. [HALF POINT]

- “... we recognise our wider obligations to society extend far beyond the distributing extend far beyond distributing electricity to homes and businesses”.
- “...we have developed a methodology to identify gaps in how we define and measure vulnerability. The resulting vulnerability map will help us to identify demographics and key social issues within the communities served.”
- “... [referred to the Knowledge Transfer Partnership with University of Dundee] It will also allow us to identify what wider social issues we need to be supporting in each region and develop local energy and non-energy partnerships to address these.”
- The stronger body of evidence which justifies this criterion awarded to SSEPD is the development of a vulnerability map. During the site visit, SSEPD has told us that they aim to use the resulting insight to increase impact such as focused PSR outreach, focuses resource allocation on collaborating with communities, informing the choice of which communities will derive the most benefit from the resilience fund and welfare packs, among other things.
- Half a point was awarded because, so far, SSEPD has only developed a methodology to carry out this project and has not yet implemented it. They expect to get feedback from mapping studies by October and seem to have definite plans to implement lessons.

Network company aware that there isn't a one size fits all approach to vulnerable consumers

- During the site visit, SSEPD has told us that they define vulnerability by Exposure, Susceptibility and Adaptive Capacity.
- They do base their definition on the 21 vulnerability codes that are common to the industry. Additionally, anyone who feels vulnerable can apply, and they will then categorise them according to the existing vulnerability codes (tailoring to the customer by including notes).

Good understanding of the main vulnerability issues facing its consumers. [HALF POINT]

- While SSEPD has shown a strong understanding of wider consumer vulnerability issues (see page 2 of the submission) we have not found evidence in the submission highlighting what specific vulnerabilities affect their customers.
- We have awarded half a point, however, as we were satisfied that the methodology developed to map vulnerabilities and implement the feedback deriving from it was robust enough to enable them to identify issues affecting its vulnerable customers. We were provided with evidence of this during the site visit; feedback from the mapping exercise is expected to be received by October.

Sub Criteria B – Engagement with Stakeholders to improve the data and information that they hold on vulnerable consumers and what they do with it

Clear link between Stakeholder Engagement programme and the network company's data acquisition strategy but the former is not fully utilised in the latter.

- "Call centre staff checking with each customer, we contact or who contact us, if our information is accurate, and update it accordingly. Moderator sessions review this aspect of their call as part of their performance review and our database now records the number of times that records have been checked and updated."
- During our site visit discussions, we have understood that with every call exchanged call staff knows how vulnerability has evolved.
- However, acquisition strategy seems not to be fully featured in stakeholder engagement strategy.

Broad and inclusive range of stakeholders are engaged using a variety of appropriate mechanisms

- SSEPD makes extensive use of data sharing partnerships to acquire data. They have 18 partnerships with a large number of institutions to enlarge their reach. Meeting this criterion enables SSEPD to qualify for "Excellent" performance. See following criteria.

As 'Good', plus Stakeholder Engagement programme includes challenging and hard-to-reach stakeholders, using mechanisms fully tailored to meet the needs of various stakeholder groups.

- During the site visit, SSEPD addressed our concern that it has some ways of reaching hard-to-reach consumers and get them on the PSR through signposting using their vulnerability mapping but no real tailored approach to getting data from these consumers.
- They provided a list of partners that help them spread awareness this particular segment of customers. NHS Scotland allows the company to reach care homes with awareness material.

Data and information updating strategies are working well

- SSEPD has a Data Information and updating strategy that works well to make sure data is up to date. They provided substantial evidence regarding the impact of this policy on their data quality.

Good progress in closing previously identified gaps

- “...We have been closing data gaps by focusing on identifying partnerships with trusted intermediaries who are able to help us connect with groups of consumers ...”
- They have provided evidence, during the site visit, showing their progress in closing data gaps they had identified by leveraging different partnerships.

Clear evidence of data usage in improving service development and delivery [HALF POINT]

- SSEPD developed a Knowledge Transfer Partnership with the University of Dundee. The latter “provides information on how to best communicate and engage with communities” as well as “highlights where we need to promote our PSR” and “target areas where there are gaps in support for consumers in vulnerable positions and where we can start to identify partnerships to address these.”
- The practical benefit of data to usage in improving service development will be unlocked during fall 2016 when the vulnerability mapping exercise will be fully operational. Hence the half point awarded.

Extensive system of use checks across all data and information with evidence of a feedback loop to data acquisition and management strategies. [HALF POINT]

- Data is monitored by trained call centre staff checking each customer (both ways contact), by looking at the supplier’s D0302 dataflow, contacting consumers who have not been updated.
- “We are in the process of establishing our internal standards and processes to cover the collection, validation, access, update, retention, privacy and protection of all personal data held about consumers...”
- While SSEPD has shown progress in this area, half a point was awarded as they are still “in the process of establishing internal standards and processes...”

Sub Criteria C – Approach taken to management and use of PSR and associated services Informed by good data analysis, Network Company is proactively identifying vulnerable consumers outside of the “core” groups, fully reflecting fact that vulnerability can be complex and multidimensional. [HALF PONT]

- “Our vulnerability mapping study methodology will help us identify geographic locations where there are pockets of vulnerability... helping us identify strategies to increase registrations within areas where levels of PSR register consumers are significantly lower ... will also help us identify the most appropriate locally trusted intermediary to help us connect with consumers and gain trust..”
- “1807 PSR consumers registered under the four needs codes outside the core groups.”
- The mapping methodology is SSEPD’s focus on how they will use data to identify consumers outside the “core” groups. Given that it is still under development half a point was awarded. This carries over to the next criteria.

As ‘good’ plus approach reflects fact that vulnerability may be transitory, providing options for temporary access to PSR and ensuring that those consumers who are no longer eligible (due to temporary nature of their vulnerability) are taken off the PSR list.

- “...we adapt our service to the changing circumstances that life throws at consumers ... This marker lasts for 12 months at which point it is automatically flagged up to the PSR team who contact the consumer to discuss their circumstances and assess the support they need.”

Targeted advertising of the PSR and the services offered to vulnerable consumer groups

- “17,500 PSR leaflets distributed in partnership with trusted intermediaries such as NHS, local authorities, senior clubs and community centres.”
- As part of the site visit the company provided a list of partners detailing how they were engaged with and which particular segment of customer they focused on. The choice of these partners was driven by SSEPD’s expert panel as well as internal discussions.
- We expect the company to improve in this area as a result of their access to the full vulnerability mapping exercise.

A wide range of additional services offered that clearly reflects the specific needs of the “core” eligible groups of consumers

- SSEPD provides consumers on its PSR with an extensive set of baseline services along with a set of services targeted to PSR consumers during planned and unplanned power cuts.
- The mapping methodology will allow them to carry out a detailed need analysis and tailor services with a closer fit to each area in the future.
- We have received evidence of their plans during the site visit.

Some additional services also offered for PSR consumers outside of these core eligible groups

- Some of these services, like calls during planned supply interruptions and catering vans during unplanned ones, are available to ALL consumers on the PSR.

Network company able to provide basic justification of the practicality of offering these services and how they ‘add value’ for these groups of consumers.

- On page 7 and page 10 of the submission, SSEPD talks about the practicality of their service offering from working with trusted intermediaries to deliver tailored solutions.

Sub Criteria D – Approach taken to develop and utilise partnerships to identify and deliver solutions for vulnerable consumers

Some links with other services for vulnerable consumers and partnerships to improve cross-referrals, and some participation in referral networks in area when invited. However, no clear strategy.

- As a result of our review, we have found no overarching strategy to developing partnerships, no signs of how they may be used once in place.
- During our site visit, SSEPD has highlighted that they have a standardised initiative assessment which helps them determine if a partnership will bring value to their business and stakeholders. *We do not consider this to be a strategy.*

Strategy informed by evidence of benefits of existing partnerships on vulnerable consumers.

- [About the Knowledge Transfer Partnership] “These findings have informed our vulnerability mapping study, and who we partner to overcome some of the social issues affecting our service provision.”
- As a result of our site visit, we have understood that the final vulnerability mapping exercise will deliver its results in October of 2016.
- According to SSEPD, this step will allow to improve substantially their understanding of how to form even more relevant partnerships. While the mapping exercise is being developed, we can see that it has already informed SSEPD’s strategy; a full point was therefore awarded.

Extensive range of partnerships with a wide variety of organisations types.

- In the ‘Summary of other Partnerships’ as well as in the text, SSEPD has shown the width of their partnership plan. Truly inclusive in scope and scale.

Partnerships provide some support to most groups of vulnerable consumers

- While it is clear that many of the partnerships outlined in the document provide some level of assistance, it is not clear that they deliver support to *all* groups of vulnerable consumers.
- “During live faults, we have increased the presence of staff who can provide additional support to those who have become temporarily vulnerable.”

Network company has leading role in the partnerships that it has developed, working together to identify vulnerable consumers and solutions

- From an initial review of the evidence, it appeared that SSEPD played a major role in the establishment of some but not *all* these partnerships.
- As a result of the evidence provided during the site visit we have awarded a full point; the company provided evidence that they played a leadership role in the data sharing agreements to close gaps in data acquisition and service outreach.

As ‘good’, but network company is utilising these partnerships in an effective way to also deliver solutions without creating unnecessary work for the network company. [HALF POINT]

- “Informed by stakeholder and Government statistics our flagship partnership in 2015/16 with Warmworks represents the type of partnership we believe deliver most benefits without creating unnecessary work for us.”
- During the site visit, SSEPD provided evidence that their staff was involved upfront in agreeing how the fund would be used by Warmworks to support fuel poor customers. The involvement of their staff during the term of the contract is for monitoring and reporting purposes only.
- While this project has been set up in a way to avoid excessive resources to be employed by SSEPD staff, it only covers one of the several partnerships they have entered. Half a point was awarded because the principle of “creating unnecessary work” is not widely applied to all partnerships.

Sub Criteria E – Embedding their strategy for addressing consumer vulnerability in their systems, processes and how they manage interactions

Clear feedback loop, with the information captured on consumer needs and vulnerabilities being reflected in network company’s stakeholder engagement strategy, work around the PSR, and its partnership strategy.

- “Following focus groups, we improved our written communications, text and recorded messaging about restoration time.”
- As a result of our site visit discussion we have understood that their expert vulnerability panel, as well as various partnerships, provide feedback that is translated into actions addressing consumer needs. An example is the review of vulnerability training by the Panel.

Network company provides more justification than ‘Fair’ but is not able to fully justify why its chosen actions address social issues relevant to vulnerable consumers

- There are various sections in which SSEPD highlights the way some of its selected activities benefit vulnerable consumers. They do not say why they chose this specific measure and do not give any indication regarding what could be more useful. The following is one example.
- “... we introduced [Young Babies under 12 months] code in 2013 after a large number of new families identified themselves as struggling to cope with dramatic changes in their lifestyle. When combined with the experience of a power cut they became very distressed and worried about how to keep their baby warm and fed.”

Basic understanding of any areas where it is currently falling short and could improve its performance

- “Our Annual Distribution Business Plan for 2016/17 includes a strategic priority to deliver excellent customer service which is tailored to the individual. For those in vulnerable positions we have committed to the following:
 - Key Performance Indicators tracking delivery of consumer vulnerability responsibilities at strategic, organisational and operational levels within SSEPD
 - Provision of community-based vulnerability data (based on vulnerability mapping) to inform local decisions on matters including network investment, customer service, community support activity and communications
 - Implement a strategy so that customers can communicate with us on an equal basis regardless of any impairments or language differences
 - All frontline staff will have participated in training to help them identify, record and respond to vulnerability
 - Improve the accuracy of our PSR Consumer Data.”
- During the site visit discussions, we understood that this list of improvements was identified in partnership with an expert in the field and their expert panel.

Lack of clarity around plans to address shortcoming and/or barrier to performance improvement

- From a review of the evidence in the submission, there seems to be no specific plan to address these limitations yet.
- While we were provided with plans to address some strategic priorities we cannot take that evidence into account as clear plans to address shortcomings were not presented in the Submission.

Consumer service staff trained in identifying and responding to consumer vulnerabilities with a range of network company and partner services selected to meet wide range of consumer needs and circumstances.

- "... we have trained 1,024 front line staff from call centres and 12 regional depots to recognise signs of vulnerability, identify individual needs and offer appropriate solutions."
- "All front-line staff will have participated in training to help them identify, record and respond to vulnerability."

As 'good' with social role a key aspect of consumer services and front-line staff training and service design with all frontline staff trained to identify and record consumer vulnerability with access to a wide range of responses developed and available to support consumers.

- "Our newly created PSR team, under the guidance of our Social Obligations Manager, provides dedicated support for consumers in vulnerable positions. Our team receives extensive in-depth training to ensure that they have the additional expertise they need to assess the most appropriate solution for a consumer's situation on a case-by-case basis."
- "PSR team receives enhanced training including shadowing trusted intermediaries to ensure they have experienced vulnerability in real life."
- Furthermore on page 10 of the submission SSEPD shows the impact that training is having on changing the company's culture to help support vulnerable customer's individual needs.
- As a result of feedback provided by the network company, we understood that SSEPD trains 100% of their frontline staff (including contractors facing the customer).

Evidence that staff have the flexibility available to 'do the right thing' for any consumer and are empowered to focus on areas where they can be most effective.

- "All teams are empowered to be flexible so that decisions are based on the needs of consumers (especially those in vulnerable positions) within their area."
- We have been told during the site visit that SSEPD staff has total flexibility in catering to the specific needs of vulnerable customers in each situation. They have listed instances of this happening, showing buy-in to the issue of consumer vulnerability on behalf of consumer-facing staff.

SPEN - Scoring Sheet

| A : Strategic understanding and commitment to the role that network companies can play in tackling social issues relevant to vulnerable consumers | | | | |
|--|---|---|--|--|
| | Weak | Fair | Good | Excellent |
| <p>A1</p> <p>Understanding of the definition of vulnerable consumer.</p> <p>Awareness of the range of social issues.</p> | <ul style="list-style-type: none"> <input type="checkbox"/> Understanding of vulnerability restricted to general definition of vulnerability. <input type="checkbox"/> Little or no knowledge of what vulnerability looks like for the network company's consumer base. <input type="checkbox"/> General poor awareness of the social issues that vulnerable consumers face. | <ul style="list-style-type: none"> <input type="checkbox"/> Basic understanding of vulnerability across its consumer base. <input type="checkbox"/> Largely focussed on the key vulnerability characteristics. <input type="checkbox"/> Good awareness of the range of social issues associated with the industry relevant to vulnerable consumers in general. | <ul style="list-style-type: none"> ✓ Network Company aware that there isn't a 'one size fits all' approach to vulnerable consumers. ✓ Good understanding of the main 'vulnerability issues' facing its consumers ✓ Good awareness of the social issues associated with the industry that are most prevalent across its vulnerable cons. base. | <ul style="list-style-type: none"> ✓ Enough flexibility to adapt to differences in vulnerability and changing needs of vulnerable consumers. ✓ Network Company also thinking about issues external to the energy industry which could affect the vulnerability of consumers to energy issues or the utilisation of partner organisations. |
| <p>A2</p> <p>Recognition and integration of role in relation to social issues</p> | <ul style="list-style-type: none"> <input type="checkbox"/> Recognition of social role confined to generalised statements. <input type="checkbox"/> Limited integration into overall business strategy. | <ul style="list-style-type: none"> <input type="checkbox"/> References to social role within strategy but tendency to treat as 'add on' aspects of business strategy and practices rather than integral aspects of service development and delivery. ✓ Limited used of targets to basic targets to improve performance and increase impact. | <ul style="list-style-type: none"> <input type="checkbox"/> Fully integrated understanding of social role with clear plans for developing systems and consumer-facing services to reflect role with targets for improved performance and increased impact. | <ul style="list-style-type: none"> <input type="checkbox"/> Delivering on social role a key business driver underpinning design, planning and delivery of all services with core objective to 'make the most of what the network company does' to tackle relevant social issues. <input type="checkbox"/> Network company has challenging targets to improve performance and increase impact |

| B: Engagement with stakeholders to improve the data and information that they hold on vulnerable consumers and what they do with it | | | | |
|--|---|---|---|--|
| | Weak | Fair | Good | Excellent |
| B1 Acquisition and Management | <ul style="list-style-type: none"> <input type="checkbox"/> No clear link between network company's stakeholder engagement programme and data acquisition strategy <input type="checkbox"/> Latter largely based on existing PSR and associated PSR 'recruitment' systems <input type="checkbox"/> Basic data and information management strategy in place but not always implemented. | <ul style="list-style-type: none"> <input type="checkbox"/> Clear link between SE programme and the network company's data acquisition strategy, but the former is not fully utilised in the latter ✓ Data and information management strategy an integral part of the network company's wider data and information strategies. <input type="checkbox"/> Evidence of good progress in keeping records up to date. <input type="checkbox"/> Awareness of data gaps and processes in place to address these. <input type="checkbox"/> Some consistency between data sources. | <ul style="list-style-type: none"> ✓ SE programme is fully utilised in developing the network company's data acquisition strategy. ✓ Broad and inclusive range of stakeholders are engaged using a variety of appropriate mechanisms. ✓ Data acquisition carried out by the network company in a timely and systematic way. <input type="checkbox"/> Data and information updating strategies working very well. <input type="checkbox"/> Good progress in closing previously id'fied gaps. <input type="checkbox"/> No data source consistency issues. | <ul style="list-style-type: none"> ✓ As 'Good', plus Stakeholder Engagement programme includes challenging and hard-to-reach stakeholders, using mechanisms fully tailored to meet the needs of various stakeholder groups. |
| B2 Use | <ul style="list-style-type: none"> <input type="checkbox"/> Ad hoc use of data to enhance insight but no strategic approach to consumer insight to enable targeting work to address vulnerability and support social role. | <ul style="list-style-type: none"> <input type="checkbox"/> As 'Weak', plus basic systems in place to keep track of data use and some feedback to data acquisition and management strategies. | <ul style="list-style-type: none"> ✓ Clear evidence of data usage in improving service development and delivery. <input type="checkbox"/> Extensive system of use checks across all data and information with evidence of a feedback loop to data acquisition and management strategies. | <ul style="list-style-type: none"> <input type="checkbox"/> As 'Good' plus using data to assess future risk of vulnerability and shape partnerships with other relevant organisations. <input type="checkbox"/> Clear strategy underlying the feedback loop to data acquisition and management strategies. |

C: Approach taken to management and use of PSR and associated services

| | Weak | Fair | Good | Excellent |
|--|---|--|--|---|
| <p>C1 Eligibility and take up of the PSR</p> | <ul style="list-style-type: none"> <input type="checkbox"/> Eligibility for the PSR is largely confined to the “core” eligible groups defined by Ofgem. <input type="checkbox"/> Basic reactive PSR recruitment programme by the consumer-facing services team when contact with a consumer is made who displays possible vulnerable circumstances. | <ul style="list-style-type: none"> <input type="checkbox"/> Well-managed PSR list with some evidence of strategic approach to eligibility outside of the “core” groups. <input type="checkbox"/> Basic advertising of the PSR and the services offered, e.g. posters and leaflets, in key locations linked to vulnerable consumers, e.g. doctors’ surgeries. | <ul style="list-style-type: none"> <input type="checkbox"/> Informed by good data analysis, Network Company is proactively identifying vulnerable consumers outside of the “core” groups, fully reflecting fact that vulnerability can be complex and multidimensional. <input type="checkbox"/> Targeted advertising of the PSR and the services offered to vulnerable consumer groups. | <ul style="list-style-type: none"> √ As ‘good’ plus approach reflects fact that vulnerability may be transitory, providing options for temporary access to PSR and ensuring that those consumers who are no longer eligible (due to temporary nature of their vulnerability) are taken off the PSR list. √ Extensive PSR recruitment programme, drawing on data and information sources to proactively identify and contact eligible consumers. |
| <p>C2 Services offered to consumers on the PSR</p> | <ul style="list-style-type: none"> <input type="checkbox"/> PSR services are restricted to the minimum list of services defined by Ofgem. | <ul style="list-style-type: none"> <input type="checkbox"/> Limited additional services offered with some links to the needs of the “core” eligible groups. <input type="checkbox"/> Network company able to provide basic justification of the practicality of offering these services and how they ‘add value’ for these groups of consumers. | <ul style="list-style-type: none"> <input type="checkbox"/> A wide range of additional services offered that clearly reflect the specific needs of the “core” eligible groups of consumers. <input type="checkbox"/> Detailed analysis of need undertaken which demonstrates how these services reflect the complex and multidimensional nature of vulnerability. <input type="checkbox"/> Some additional services also offered for PSR consumers outside of these “core” eligible groups. | <ul style="list-style-type: none"> – A full range of additional services developed according to detailed needs analysis of all PSR consumers and the nature of their vulnerability. Approach also reflects the fact that vulnerability may be transitory. – Full justification for how these services add value to the associated group of PSR consumers. |

| D: Approach taken to develop and utilise partnerships (e.g. referral networks) to identify and deliver solutions (both energy and non-energy) for vulnerable consumers | | | | |
|---|---|---|--|---|
| | Weak | Fair | Good | Excellent |
| D1 Overall partnership strategy | <p>√ Some links with other services for vulnerable consumers and partnerships to improve cross-referrals, and some participation in referral networks in area when invited. However, no clear strategy.</p> | <p><input type="checkbox"/> Clear strategy towards developing partnerships with relevant organisations, including ideas about what can be achieved from these partnerships in relation to the identification of vulnerable consumers, and identification and delivery of solutions.</p> | <p><input type="checkbox"/> Clear strategy towards both developing partnerships with relevant organisations and how to utilise these partnerships when they are in place.</p> <p>– Strategy informed by evidence of benefits of existing partnerships on vulnerable consumers.</p> | <p><input type="checkbox"/> As good, plus fully utilising existing partnerships.</p> <p><input type="checkbox"/> Network company aware of the limitations of existing partnerships and the wider limitations on the network company in relation to expanding those partnerships.</p> <p><input type="checkbox"/> Partnership strategy includes plans to overcome limitations, where possible.</p> |
| D2 Developing partnerships | <p><input type="checkbox"/> Participation in partnerships with a limited range of organisation types, largely within the utility sector.</p> <p><input type="checkbox"/> Partnerships provided limited support for the “core” groups of vulnerable consumers.</p> | <p><input type="checkbox"/> Wide range of partnerships extending beyond the utility sector.</p> <p><input type="checkbox"/> Partnerships provide some support to most groups of vulnerable consumers.</p> | <p>√ Extensive range of partnerships, with a wide variety of organisation types.</p> <p>– Partnerships provide full and effective support for all groups of vulnerable consumers.</p> | |
| D3 Utilising partnerships | <p><input type="checkbox"/> Partnerships largely restricted to referral and signposting.</p> | <p><input type="checkbox"/> Partnerships utilise data and information flows where appropriate, but these flows are largely one-sided and can be infrequent.</p> | <p>– Network company has leading role in the partnerships that it has developed, working together to identify vulnerable consumers and solutions.</p> | <p><input type="checkbox"/> As ‘good’, but network company is utilising these partnerships in an effective way to also deliver solutions without creating unnecessary work for the network company.</p> |

| E: Embedding their strategy for addressing consumer vulnerability in their systems, processes and how they manage consumer interactions | | | | |
|--|---|--|--|---|
| | Weak | Fair | Good | Excellent |
| E2 Embedding strategy general systems and processes and awareness of impact and effectiveness of actions. | <ul style="list-style-type: none"> <input type="checkbox"/> Basic reflection of network company's role into general systems and processes throughout the business. <input type="checkbox"/> Very little information therefore provided from consumer-facing services to other business systems and processes. <input type="checkbox"/> Network company able to provide little justification as to why its chosen actions address social issues relevant to vulnerable consumers. | <ul style="list-style-type: none"> ✓ Clear feedback loop, with the information captured on consumer needs and vulnerabilities being reflected in network company's stakeholder engagement strategy, work around the PSR, and its partnership strategy. <input type="checkbox"/> Network company able to provide basic justification as to why its chosen actions address social issues relevant to vulnerable consumers. ✓ Basic understanding of any areas where it is currently falling short and could improve its performance. ✓ Lack of clarity around plans to address shortcoming and/or barriers to performance improvement. | <ul style="list-style-type: none"> ✓ As 'fair', plus services routinely monitored and evaluated to test extent to which they are meeting consumer needs. <input type="checkbox"/> Feeds into wider service design and other general systems and processes throughout the business. ✓ Full senior management buy-in to the network company's strategy in this area. ✓ Network company provides more justification than "Fair", but is not able to fully justify why its chosen actions address social issues relevant to vulnerable consumers. <input type="checkbox"/> Network company has clear plans to address shortcomings and/or barriers to performance improvement it is currently facing. | <ul style="list-style-type: none"> <input type="checkbox"/> High level of integration of the network company's role into general systems and processes throughout the business. <input type="checkbox"/> Very clear feedback loop between the monitoring and evaluation of services by the consumer-facing teams to the overall strategy in relation to social issues relevant to vulnerable consumers. <input type="checkbox"/> Evaluation not restricted to retrospective assessment of activities or quantitative assessment of activities. <input type="checkbox"/> As 'Good', plus network company able to fully justify why its chosen actions address social issues relevant to vulnerable consumers and demonstrate why these 'add value' and are more effective over alternatives. |
| E1 Embedding strategy in managing consumer interactions | <ul style="list-style-type: none"> <input type="checkbox"/> Consumer-facing services and associated processes show only a basic reflection of the network company's social role. <input type="checkbox"/> They do not focus on capturing information to identify vulnerabilities beyond basic PSR recruitment. | <ul style="list-style-type: none"> <input type="checkbox"/> Consumer-facing services routinely capturing information on consumer needs and vulnerabilities to support tailoring of PSR services and work with partners for further support to limited range of services delivered by others. | <ul style="list-style-type: none"> ✓ Consumer service staff trained in identifying and responding to consumer vulnerabilities with a range of network company and partner services, selected to meet wide range of consumer needs and circumstances | <ul style="list-style-type: none"> <input type="checkbox"/> As 'good' with social role a key aspect of consumer services and front-line staff training and service design, with all front-line staff trained to identify and record consumer vulnerability with access to a wide range of responses developed and available to support consumers. ✓ Evidence that staff have the flexibility available to 'do right thing' for any consumer and are empowered to focus on areas where they can be most effective. |

Ofgem Reference Scoring Points

| Weak | Fair | Good | Excellent |
|-------------|-------------|-------------|------------------|
| Below 6 | 6-7 | 8 | 9-10 |

Final Assessment of SPEN Performance

| SECV Sub-Criteria | Score | Mark |
|--------------------------|--------------|-------------|
| A | 8.5/10 | Good |
| B | 8.5/10 | Good |
| C | 8.5/10 | Good |
| D | 6.5/10 | Fair |
| E | 8/10 | Good |

Evidence-based Review

Sub Criteria A – Strategic understanding and commitment to the role that network companies can play in tackling social issues relevant to vulnerable consumers

Network Company aware that there isn't a 'one size fits all' approach to vulnerable consumers

- SPEN states in their submission that factors impacting vulnerable customers may change in time, and it is important that they can register for support, but their needs are regularly reviewed and updated

Good understanding of the main 'vulnerability issues' facing its consumers

- "...we identified two areas for particular focus, which our data told us were made up of significantly more vulnerable communities. These areas were Dumfries & North Wales."
- "Customers in Dumfries & North Wales experience the most power cuts due to their location & weather conditions."

Good awareness of the social issues associated with the industry that are most prevalent across its vulnerable consumer base

- "...we have tailored our initiatives to deliver wider social benefits to tackle issues such as social isolation, loneliness, depression anxiety and independence."
- During the site visit, we understood that this list of social issues applies directly to SPEN's consumers. They used some methods to get to this list including mapping vulnerability and, importantly, getting feedback from their expert panel on stakeholder engagement issues and their local partners. As a result of this feedback, they have built initiatives around elderly customers.

Network Company also thinking about issues external to the energy industry which could affect the vulnerability of consumers to energy issues or the utilisation of partner organisations.

- "...we need to tackle wider social issues and our initiatives are developed with this in mind."
- SPEN mentions isolation, depression, anxiety and independent as wider social issues and shows that it is effectively thinking about issues external to the energy industry.

Limited use of targets to basic targets to improve performance and increase impact.

- They have shared with us a detailed explanation of their objectives to improve the Customer Satisfaction measure between 2016 and 2022/2023. They benchmark their score against that of the UK CSI to gauge their performance against best performers.
- While this is a good indication of targets to increase performance, the target is tracking a basic consumer satisfaction measure. No evidence was found of plans for improved, practical, impact on consumers.

Enough flexibility to adapt to differences in vulnerability and changing needs of vulnerable consumers

- "We have taken steps to include a number of new categories over and above the 21 standard categories in our register in advance of any industry change."

Sub Criteria B – Engagement with Stakeholders to improve the data and information that they hold on vulnerable consumers and what they do with it

Clear link between Stakeholder Engagement programme and the network company’s data acquisition strategy but the former is not fully utilised in the latter.

- “We have signposting and referral networks established, data sharing arrangements and robust systems for capturing and recording data to make sure we continuously grow our Priority Services Register (PSR).”
- “We contact customers in advance of every planned interruption as well *as customers on our Priority Services Register every two years to check our records are accurate.*”
- SPEN presented a 10 step approach to utilising their stakeholder engagement strategy to deliver meaningful output, placing much emphasis on the role that data plays in this process. It is unclear however if SPEN is considering additional ways in which it can make use of its strategy to enhance data collection.
- During the site visit, we gathered evidence that partnerships (part of the wider Stakeholder Engagement programme) play an important role in data acquisition. They measure various metric such as financial savings, provide case studies to widen the scope of information acquired.

As ‘Good’, plus Stakeholder Engagement programme includes challenging and hard-to-reach stakeholders, using mechanisms fully tailored to meet the needs of various stakeholder groups.

- There is evidence in the submission that programs such as Network Natter and Jab and Jabber are useful in identifying harder to reach consumer. A specific example is provided of how Jab and Jabber allows SPEN to spread awareness and acquire data on the following categories of vulnerable consumers: over the age of 65, patients with certain medical conditions, patients very overweight, pregnant women, those living in residential care, carers for elderly or disabled patients, front line health or social work professionals.

Broad and inclusive range of stakeholders are engaged using a variety of appropriate mechanisms

- As can be seen on page 5 of the submission SPEN makes extensive use of data sharing partnerships with a broad range of organisations (from the British Red Cross to SGN and Age Scotland). This allows them to engage a variety of different stakeholders.

Data and information management strategy is an integral part of the network company’s wider data and information strategies.

- “We have a clear data strategy supporting the activities we undertake for ALL customers. Our targeted initiatives supporting our most vulnerable customers are informed by social data mapping.”
- “We have defined the strategy and processes for new customers joining our register, as well as proactive identification and maintenance of our customer records. “

Clear evidence of data usage in improving service development and delivery

- “Our targeted initiatives supporting our most vulnerable customers are informed by social data mapping.”
- We have collected evidence during the site visit on how data is driving some of SPEN’s activities and engagement with consumers. We are satisfied that data seems to be improving their service delivery.

Data acquisition carried out by the network company in a timely and systematic way

- There is evidence on page 5 of the SECV Part 3 submission that SPEN contacts customers on their PSR every two years to check their details are accurate. We consider this a systematic way to acquire data.

Sub Criteria C – Approach taken to management and use of PSR and associated services Informed by good data analysis, Network Company is proactively identifying vulnerable consumers outside of the “core” groups, fully reflecting the fact that vulnerability can be complex and multidimensional.

- SPEN’s data mapping approach laid out on page 2 of the Submission highlights how they utilise data analysis to proactively identify vulnerable consumers. This measure allows us to take into consideration an ‘Excellent’ mark for this measure, addressed later.

As ‘good’ plus approach reflects fact that vulnerability may be transitory, providing options for temporary access to PSR and ensuring that those consumers who are no longer eligible (due to temporary nature of their vulnerability) are taken off the PSR list.

- “We have included a number of Transient Vulnerability Categories such as:
 - New Born Babies
 - Post Hospital recovery
 - Bereavement
 - Life changing events (for example Redundancy)
 - Families with children under 5
 - Water Dependency (for customers who are medically dependent on a water supply)”
- “Our Transient categories have been implemented with the option of registering for 6, 12 or 18 months and we will proactively monitor these through management reporting to ensure customers records are updated once their circumstances change.”

Extensive PSR recruitment programme drawing on data and information sources to proactively identify and contact eligible consumers.

- “Our data sets identify customers who have registered on our PSR that would benefit from additional support, as well as those customers deemed to be in fuel poverty.”
- “We take approx. 600,000 calls every year and ask questions to pro-actively identify new customers or changes in circumstances on every call.”
- “We have business processes such as our “Planned Pre-Vet” and “Person on Site” which identifies vulnerable customers proactively.”
- “We engaged with local car parks, pharmacy bags & Digital Awareness screen in GP Surgeries within our most vulnerable areas and printed PSR awareness messages on the back of car park tickets.”
- “We targeted 26 postcodes in our most vulnerable communities impacting 7,500 homes for direct mailing as a result of our data mapping.”
- During the site visit, we have seen a practical example of vulnerability mapping which highlighted the need to focus engagement and resources, initially, in the Dumfries area, significantly more deprived than other regions.

A full range of additional services developed according to detailed needs analysis of all PSR consumers and the nature of their vulnerability. Approach also reflects the fact that vulnerability may be transitory. [HALF POINT]

- With services offered as part of their PSR membership and those provided through the Natter partnership, SPEN is providing a significant number of services that address the core needs of *eligible core* groups. The services offered as part of the Network Natter have been rolled out to the remaining 11 districts in 2016 and are now available to the full consumer base. The network company is now moving into North Wales for targeted engagement and will replicate any additional services developed elsewhere that are appropriate across the full consumer base.
- During the site visit evidence was provided that all services provided as part of their PSR are available to *all* vulnerable consumers.
- During the site visit, we were told that the Social Working Group and the local network of the main partners were crucial in picking which services to offer. *We assume that these parties have undertaken needs analysis, but we have no evidence that SPEN has carried out such analysis.* For this reason, we awarded half point on this measure.
- Furthermore, we acknowledge the importance of the Network Natter initiative in addressing specific vulnerabilities of the Dumfries area. This initiative, is, however, still being rolled out to other areas (more will be done in 2016).

Full justification for how these services add value to the associated group of PSR. [HALF POINT]

- Half a point was awarded because we saw no consistent explanation for the value added by services. While we found, in the submission, indications of how the Network Natter sessions are addressing the specific needs of consumers in the Dumfries area, the same type of indication is not applied to all PSR groups.

Sub Criteria D – Approach taken to develop and utilise partnerships to identify and deliver solutions for vulnerable consumers

Some links with other services for vulnerable consumers and partnerships to improve cross-referrals, and some participation in referral networks in area when invited. However, no clear strategy.

- While SPEN utilises a substantial network of partnerships both in scale and scope, it does not highlight any particular strategy for choosing partners or on how using newly-established partnerships. They do an excellent job of measuring the benefits of each partnership by highlighting a cost-benefit analysis for each major partnership undertaken.

Extensive range of partnerships with a wide variety of organisations types.

- SPEN partners with a wide range of institutions. As shown on page 5,6,7 and 8 of their submission.

Partnerships provide full and effective support for all groups of vulnerable consumers. [HALF POINT]

- Partnerships outside of the Natter Initiative provide a wide net of support to vulnerable consumers, ranging from energy efficiency, to free wood deliveries, debt advice, social care support and various others. See page 5 for more detail.

- While the Network Natter initiative is being rolled out, evidence gathered in the site visit points to SPEN offering the same services offered in Dumfries, originally, to the remaining 11 districts in 2016. We believe that the approach taken to servicing the needs of vulnerable consumers through a network of partners that can rely on different capabilities to address each case is the best way to provide *effective* support.
- Notwithstanding the existence of evidence to suggest that services have been rolled out to the wider consumer base of SPEN there is no evidence that the same (successful) partnership model applied in Dumfries is being applied to the remaining districts. Hence, the half point awarded.

Network company has leading role in the partnerships that it has developed, working together to identify vulnerable consumers and solutions. [HALF POINT]

- “SPEN lead the Network Natter events which are held as part of existing elderly community groups.”
- During the site visit, we were told that SPEN has led partnership to share data with resilience partners and is in the process of setting up new protocols to gain informed consent.
- We believe that the evidence they lead partnerships is focused on a small number of cases and it is not sufficient to award more than half a point for this measure.

Strategy informed by evidence of benefits of existing partnerships on vulnerable consumers [HALF POINT]

- While we cannot find evidence of any overarching strategy to identify, develop and utilise partnerships we acknowledge that SPEN has measured the benefits of partnerships.
- We awarded half a point because of their effort to measure benefits from partnerships while not finding evidence of how this exercise informs data partnerships.

Sub Criteria E – Embedding their strategy for addressing consumer vulnerability in their systems, processes and how they manage interactions

Clear feedback loop, with the information captured on consumer needs and vulnerabilities being reflected in network company’s stakeholder engagement strategy, work around the PSR, and its partnership strategy.

- “We seek and use customer feedback to shape our policies and processes. We use this feedback to shape our improvement initiatives and drive action delivery through our organisation supported by our coaching and performance management framework.”
- Throughout the submission and as part of our site visit discussion we have understood the central role that panels informing and directing stakeholder engagement strategy have on communicating consumer needs to inform strategy.

Network company provides more justification than ‘Fair’ but is not able to fully justify why its chosen actions address social issues relevant to vulnerable consumers

- SPEN does a very good job in calculating the benefits (through a Cost Benefit Analysis) that its partnerships and the services that the latter provide yield for consumers. A large evidence base can be found on pages 6,7,8.

Basic understanding of any areas where it is currently falling short and could improve its performance

- At the bottom of page 9 of their submission SPEN highlights targets for improvement such as: “2016 Staff Training & Qualification Planned for Field and CS Staff” and “Move into our North Wales area to establish local network supporting most vulnerable.”

Lack of clarity around plans to address shortcoming and/or barriers to performance improvement.

- A review of the submission highlights that there is no evident plan to address shortcomings.

Consumer service staff trained in identifying and responding to consumer vulnerabilities with a range of network company and partner services, selected to meet wide range of consumer needs and circumstances

- "...we ensure that our staff are empowered to use their initiative and deliver the best service for all customers."
- "We also encourage staff at all levels to really listen to what their customers are saying, to own their customer and cut through problems and barriers to resolve issues first time"
- "... the British Red Cross and National Energy Action helped us develop training to recognise all signs of vulnerability. 15 Customer Services Managers were trained by National Energy Action (NEA) on "Identifying Vulnerability" and rolled this out to their teams. More recently we have worked with Alzheimer's Scotland, Mind, Age Scotland & Dolby Vivisol to further shape our material."
- "All staff have been trained on vulnerability and what is expected from them for each category on our Priority Services Register."
- During the site visit, we were shown various additional options that Senior Management have for stakeholder engagement training.

Full senior management buy-in to the network company's strategy in this area.

- "Our governance model ensures we have a clear line of sight from our CEO through to our front line teams. Our Strategic Panels are attended by our CEO, Directors and Senior Managers from SP Energy Networks (SPEN) and senior influential stakeholders who challenge and help shape our strategy and policies"
- "Our External Panel is independently hosted and attended by our CEO, Directors and Senior Managers."

As 'fair' plus services routinely monitored and evaluated to test extent to which they are meeting consumer needs.

- SPEN has devised a vulnerable consumer focused governance system to ensure that actions are routinely monitored to make sure they meet the real consumer issues.
 - The Operational Review - Reviewing and improving the underlying drivers to performance Identifying local issues and driving local improvements.
 - Strategic Stakeholder Panels - Developing better-informed stakeholders, and challenge to our plans
 - Social Working Group - Give an external perspective
- The submission contains evidence of how SPEN measures the benefit of partnerships.

Evidence that staff have the flexibility available to 'do right thing' for any consumer and are empowered to focus on areas where they can be most effective.

- During the site visit, we were provided with numerous examples of how staff have the flexibility to do whatever is needed to help a consumer in a given situation.
- The staff has the flexibility and support from the control centre to rearrange schedule and support consumers in need.

Northern Powergrid - Scoring Sheet

| A : Strategic understanding and commitment to the role that network companies can play in tackling social issues relevant to vulnerable consumers | | | | |
|--|---|---|---|--|
| | Weak | Fair | Good | Excellent |
| <p>A1</p> <p>Understanding of the definition of vulnerable consumer.</p> <p>Awareness of the range of social issues.</p> | <ul style="list-style-type: none"> <input type="checkbox"/> Understanding of vulnerability restricted to general definition of vulnerability. <input type="checkbox"/> Little or no knowledge of what vulnerability looks like for the network company's consumer base. <input type="checkbox"/> General poor awareness of the social issues that vulnerable consumers face. | <ul style="list-style-type: none"> <input type="checkbox"/> Basic understanding of vulnerability across its consumer base. <input type="checkbox"/> Largely focussed on the key vulnerability characteristics. <input type="checkbox"/> Good awareness of the range of social issues associated with the industry relevant to vulnerable consumers in general. | <ul style="list-style-type: none"> ✓ Network Company aware that there isn't a 'one size fits all' approach to vulnerable consumers. ✓ Good understanding of the main 'vulnerability issues' facing its consumers <input type="checkbox"/> Good awareness of the social issues associated with the industry that are most prevalent across its vulnerable cons. base. | <ul style="list-style-type: none"> ✓ Enough flexibility to adapt to differences in vulnerability and changing needs of vulnerable consumers. ✓ Network Company also thinking about issues external to the energy industry which could affect the vulnerability of consumers to energy issues or the utilisation of partner organisations. |
| <p>A2</p> <p>Recognition and integration of role in relation to social issues</p> | <ul style="list-style-type: none"> <input type="checkbox"/> Recognition of social role confined to generalised statements. <input type="checkbox"/> Limited integration into overall business strategy. | <ul style="list-style-type: none"> <input type="checkbox"/> References to social role within strategy but tendency to treat as 'add on' aspects of business strategy and practices rather than integral aspects of service development and delivery. <input type="checkbox"/> Limited used of targets to basic targets to improve performance and increase impact. | <ul style="list-style-type: none"> ✓ Fully integrated understanding of social role with clear plans for developing systems and consumer-facing services to reflect role with targets for improved performance and increased impact. | <ul style="list-style-type: none"> <input type="checkbox"/> Delivering on social role a key business driver underpinning design, planning and delivery of all services with core objective to 'make the most of what the network company does' to tackle relevant social issues. <input type="checkbox"/> Network company has challenging targets to improve performance and increase impact |

| B: Engagement with stakeholders to improve the data and information that they hold on vulnerable consumers and what they do with it | | | | |
|--|---|--|--|--|
| | Weak | Fair | Good | Excellent |
| B1 Acquisition and Management | <ul style="list-style-type: none"> <input type="checkbox"/> No clear link between network company's stakeholder engagement programme and data acquisition strategy <input type="checkbox"/> Latter largely based on existing PSR and associated PSR 'recruitment' systems <input type="checkbox"/> Basic data and information management strategy in place but not always implemented. | <ul style="list-style-type: none"> <input type="checkbox"/> Clear link between SE programme and the network company's data acquisition strategy, but the former is not fully utilised in the latter. <input type="checkbox"/> Data and information management strategy an integral part of the network company's wider data and information strategies. <input type="checkbox"/> Evidence of good progress in keeping records up to date. ✓ Awareness of data gaps and processes in place to address these. <input type="checkbox"/> Some consistency between data sources. | <ul style="list-style-type: none"> <input type="checkbox"/> SE programme is fully utilised in developing the network company's data acquisition strategy. ✓ Broad and inclusive range of stakeholders are engaged using a variety of appropriate mechanisms. ✓ Data acquisition carried out by the network company in a timely and systematic way. ✓ Data and information updating strategies working very well. <input type="checkbox"/> Good progress in closing previously id'fied gaps. – No data source consistency issues. | <ul style="list-style-type: none"> <input type="checkbox"/> As 'Good', plus Stakeholder Engagement programme includes challenging and hard-to-reach stakeholders, using mechanisms fully tailored to meet the needs of various stakeholder groups. |
| B2 Use | <ul style="list-style-type: none"> <input type="checkbox"/> Ad hoc use of data to enhance insight but no strategic approach to consumer insight to enable targeting work to address vulnerability and support social role. | <ul style="list-style-type: none"> <input type="checkbox"/> As 'Weak', plus basic systems in place to keep track of data use and some feedback to data acquisition and management strategies. | <ul style="list-style-type: none"> ✓ Clear evidence of data usage in improving service development and delivery. <input type="checkbox"/> Extensive system of use checks across all data and information with evidence of a feedback loop to data acquisition and management strategies. | <ul style="list-style-type: none"> <input type="checkbox"/> As 'Good' plus using data to assess future risk of vulnerability and shape partnerships with other relevant organisations. <input type="checkbox"/> Clear strategy underlying the feedback loop to data acquisition and management strategies. |

C: Approach taken to management and use of PSR and associated services

| | Weak | Fair | Good | Excellent |
|--|---|--|--|--|
| <p>C1 Eligibility and take up of the PSR</p> | <ul style="list-style-type: none"> <input type="checkbox"/> Eligibility for the PSR is largely confined to the “core” eligible groups defined by Ofgem. <input type="checkbox"/> Basic reactive PSR recruitment programme by the consumer-facing services team when contact with a consumer is made who displays possible vulnerable circumstances. | <ul style="list-style-type: none"> <input type="checkbox"/> Well-managed PSR list with some evidence of strategic approach to eligibility outside of the “core” groups. <input type="checkbox"/> Basic advertising of the PSR and the services offered, e.g. posters and leaflets, in key locations linked to vulnerable consumers, e.g. doctors’ surgeries. | <ul style="list-style-type: none"> √ Informed by good data analysis, Network Company is proactively identifying vulnerable consumers outside of the “core” groups, fully reflecting fact that vulnerability can be complex and multidimensional. √ Targeted advertising of the PSR and the services offered to vulnerable consumer groups. | <ul style="list-style-type: none"> √ As ‘good’ plus approach reflects fact that vulnerability may be transitory, providing options for temporary access to PSR and ensuring that those consumers who are no longer eligible (due to temporary nature of their vulnerability) are taken off the PSR list. <input type="checkbox"/> Extensive PSR recruitment programme, drawing on data and information sources to proactively identify and contact eligible consumers. |
| <p>C2 Services offered to consumers on the PSR</p> | <ul style="list-style-type: none"> <input type="checkbox"/> PSR services are restricted to the minimum list of services defined by Ofgem. | <ul style="list-style-type: none"> <input type="checkbox"/> Limited additional services offered with some links to the needs of the “core” eligible groups. <input type="checkbox"/> Network company able to provide basic justification of the practicality of offering these services and how they ‘add value’ for these groups of consumers. | <ul style="list-style-type: none"> √ A wide range of additional services offered that clearly reflect the specific needs of the “core” eligible groups of consumers. √ Detailed analysis of need undertaken which demonstrates how these services reflect the complex and multidimensional nature of vulnerability. <input type="checkbox"/> Some additional services also offered for PSR consumers outside of these “core” eligible groups. | <ul style="list-style-type: none"> <input type="checkbox"/> A full range of additional services developed according to detailed needs analysis of all PSR consumers and the nature of their vulnerability. Approach also reflects the fact that vulnerability may be transitory. <input type="checkbox"/> Full justification for how these services add value to the associated group of PSR consumers. |

| D: Approach taken to develop and utilise partnerships (e.g. referral networks) to identify and deliver solutions (both energy and non-energy) for vulnerable consumers | | | | |
|---|--|--|--|---|
| | Weak | Fair | Good | Excellent |
| D1 Overall partnership strategy | <ul style="list-style-type: none"> <input type="checkbox"/> Some links with other services for vulnerable consumers and partnerships to improve cross-referrals, and some participation in referral networks in area when invited. However, no clear strategy. | <ul style="list-style-type: none"> <input type="checkbox"/> Clear strategy towards developing partnerships with relevant organisations, including ideas about what can be achieved from these partnerships in relation to the identification of vulnerable consumers, and identification and delivery of solutions. | <ul style="list-style-type: none"> ✓ Clear strategy towards both developing partnerships with relevant organisations and how to utilise these partnerships when they are in place. ✓ Strategy informed by evidence of benefits of existing partnerships on vulnerable consumers. | <ul style="list-style-type: none"> <input type="checkbox"/> As good, plus fully utilising existing partnerships. ✓ Network company aware of the limitations of existing partnerships and the wider limitations on the network company in relation to expanding those partnerships. <input type="checkbox"/> Partnership strategy includes plans to overcome limitations, where possible. |
| D2 Developing partnerships | <ul style="list-style-type: none"> <input type="checkbox"/> Participation in partnerships with a limited range of organisation types, largely within the utility sector. <input type="checkbox"/> Partnerships provided limited support for the “core” groups of vulnerable consumers. | <ul style="list-style-type: none"> <input type="checkbox"/> Wide range of partnerships extending beyond the utility sector. ✓ Partnerships provide some support to most groups of vulnerable consumers. | <ul style="list-style-type: none"> ✓ Extensive range of partnerships, with a wide variety of organisation types. <input type="checkbox"/> Partnerships provide full and effective support for all groups of vulnerable consumers. | |
| D3 Utilising partnerships | <ul style="list-style-type: none"> <input type="checkbox"/> Partnerships largely restricted to referral and signposting. | <ul style="list-style-type: none"> <input type="checkbox"/> Partnerships utilise data and information flows where appropriate, but these flows are largely one-sided and can be infrequent. | <ul style="list-style-type: none"> – Network company has leading role in the partnerships that it has developed, working together to identify vulnerable consumers and solutions. | <ul style="list-style-type: none"> <input type="checkbox"/> As ‘good’, but network company is utilising these partnerships in an effective way to also deliver solutions without creating unnecessary work for the network company. |

| E: Embedding their strategy for addressing consumer vulnerability in their systems, processes and how they manage consumer interactions | | | | |
|--|---|--|---|---|
| | Weak | Fair | Good | Excellent |
| E2 Embedding strategy general systems and processes and awareness of impact and effectiveness of actions. | <ul style="list-style-type: none"> <input type="checkbox"/> Basic reflection of network company's role into general systems and processes throughout the business. <input type="checkbox"/> Very little information therefore provided from consumer-facing services to other business systems and processes. <input type="checkbox"/> Network company able to provide little justification as to why its chosen actions address social issues relevant to vulnerable consumers. | <ul style="list-style-type: none"> ✓ Clear feedback loop, with the information captured on consumer needs and vulnerabilities being reflected in network company's stakeholder engagement strategy, work around the PSR, and its partnership strategy. <input type="checkbox"/> Network company able to provide basic justification as to why its chosen actions address social issues relevant to vulnerable consumers. <input type="checkbox"/> Basic understanding of any areas where it is currently falling short and could improve its performance. <input type="checkbox"/> Lack of clarity around plans to address shortcoming and/or barriers to performance improvement. | <ul style="list-style-type: none"> ✓ As 'fair', plus services routinely monitored and evaluated to test extent to which they are meeting consumer needs. <input type="checkbox"/> Feeds into wider service design and other general systems and processes throughout the business. ✓ Full senior management buy-in to the network company's strategy in this area. ✓ Network company provides more justification than "Fair", but is not able to fully justify why its chosen actions address social issues relevant to vulnerable consumers. ✓ Network company has clear plans to address shortcomings and/or barriers to performance improvement it is currently facing. | <ul style="list-style-type: none"> <input type="checkbox"/> High level of integration of the network company's role into general systems and processes throughout the business. <input type="checkbox"/> Very clear feedback loop between the monitoring and evaluation of services by the consumer-facing teams to the overall strategy in relation to social issues relevant to vulnerable consumers. <input type="checkbox"/> Evaluation not restricted to retrospective assessment of activities or quantitative assessment of activities. <input type="checkbox"/> As 'Good', plus network company able to fully justify why its chosen actions address social issues relevant to vulnerable consumers and demonstrate why these 'add value' and are more effective over alternatives. |
| E1 Embedding strategy in managing consumer interactions | <ul style="list-style-type: none"> <input type="checkbox"/> Consumer-facing services and associated processes show only a basic reflection of the network company's social role. <input type="checkbox"/> They do not focus on capturing information to identify vulnerabilities beyond basic PSR recruitment. | <ul style="list-style-type: none"> <input type="checkbox"/> Consumer-facing services routinely capturing information on consumer needs and vulnerabilities to support tailoring of PSR services and work with partners for further support to limited range of services delivered by others. | <ul style="list-style-type: none"> ✓ Consumer service staff trained in identifying and responding to consumer vulnerabilities with a range of network company and partner services, selected to meet wide range of consumer needs and circumstances | <ul style="list-style-type: none"> <input type="checkbox"/> As 'good' with social role a key aspect of consumer services and front-line staff training and service design, with all front-line staff trained to identify and record consumer vulnerability with access to a wide range of responses developed and available to support consumers. ✓ Evidence that staff have the flexibility available to 'do right thing' for any consumer and are empowered to focus on areas where they can be most effective. |

Ofgem Reference Scoring Points

| Weak | Fair | Good | Excellent |
|-------------|-------------|-------------|------------------|
| Below 6 | 6-7 | 8 | 9-10 |

Final Assessment of Northern Powergrid's Performance

| SECV Sub-Criteria | Score | Mark |
|--------------------------|--------------|-------------|
| A | 9/10 | Excellent |
| B | 8/10 | Good |
| C | 8.5/10 | Good |
| D | 8/10 | Good |
| E | 8.5/10 | Good |

Evidence-based Review

Sub Criteria A – Strategic understanding and commitment to the role that network companies can play in tackling social issues relevant to vulnerable consumers

Network company aware that there isn't a 'one size fits all' approach to vulnerable consumers.

- “The pattern of networks across the operating area varies and a one size fits all pattern for engagement is not possible.”

Enough flexibility to adapt to differences in vulnerability and changing needs of vulnerable consumers

- “...recognising that individual customers do not fit neatly into categories and have individual needs that we might be able to help with.”
- During the site visit, they have shown a flexible understanding of what vulnerability is, how it can change, and most importantly have shown measures to accommodate that knowledge.

Good understanding of the main vulnerability issues facing its vulnerable consumers

- “We understand the different needs of our customers. For those medically dependent on electricity with a serious medical condition... we make more attempts at contact through the available channels than those with additional support or communication needs...”
- “Our Community Investment Strategy sets our overarching strategy for supporting our local communities. Developed after a workshop run by the Centre for Sustainable Energy and consultation across a range of our stakeholders, particularly our social issues expert group...”
- “We prioritise work in the areas with highest deprivation providing the right support in the most appropriate areas.”

Network Company also thinking about issues external to the energy industry which could affect the vulnerability of consumers to energy issues or the utilisation of partner organisations.

- The network company does refer extensively to social issues, even external to the energy industry. For instance, they mention unemployment as part of their vulnerable consumer strategy (“wider environmental or economic circumstances”).
- However, *in the submission*, they *do not* go in depth on what other social issues are in general, and among its consumer base and *how* they recorded such an issue.
- When prompted about this matter during the site visit NPg provided us with examples and evidence of how it identifies internal and external issues to the industry as well as examples of issues they have focussed on.
- While many of the examples provided refer to pilot projects, for this measure, we assess their *understanding* of issues, *not actions* to address them. Therefore, we agree that this is consistent with excellent behaviour as defined by Ofgem and award a full point on this measure.

Fully integrated understanding of social role with clear plans for developing systems and consumer-facing services to reflect role with targets for improved performance and increased impact

- NPg mentions that “... CQI data showed at the half year that we had improved across the basket of performance indicators ... *a strong performance that we're looking to build on in the next six months*”. This is a short-term target, but it is, as presented in the submission, vague.

- During the site visit, NPg focused on their objectives for improved performance, upon our request. We were satisfied to see that they had both overarching targets for improvement based on their CQI measure as well as practical targets to improve impact acting on welcome packs and planned power cuts.

Sub Criteria B – Engagement with Stakeholders to improve the data and information that they hold on vulnerable consumers and what they do with it

Broad and inclusive range of stakeholders are engaged using a variety of appropriate mechanisms

- “Our letters to customers (and the telephone script) ask about wider needs such as the whether they want to know more about fuel poverty or citizen advice.”
- “... Northern Gas Networks ask customers eligible for an Assisted Gas Connection Voucher if they would like to be added to our PSR ...” – sharing data with partners
- “We have a very good relationship with Baywater Healthcare ... and share data with them to ensure that together we provide the best care to their clients.”
- The network company employs the following methods to acquire and update data: SMS, letter, note reminder, email reminder, calls
- NPg has met with regional and local Adult Safeguarding Boards to widen engagement through nurses and social workers. The same has been done with housing associations.

Data acquisition carried out by the network company in a timely and systematic way

- “The maintenance phase, the ongoing updating of our register contacting each person at least once every two years” we consider this to be a *systematic* way of refreshing data.
- During the site visit, we were told that NPg had made a conscious decision to slow down marketing of the PSR until they were confident with the design of their data management process. *We chose not to penalise this approach as it seeks to bring a positive impact to data quality while saving resources.*

Data and information updating strategies are working very well

- In page 3 of the submission, NPg presents “Data Refresh in Numbers” providing substantial evidence of its progress in this area.

Awareness of data gaps and processes in place to address these

- “For some years our database held us back from active marketing of the register.”
- When asked about this issue during the site visit NPg representatives answered that they believe they had too many people on the PSR and non-matching PSR records, they have found some inconsistent data.
- The process in place to address these issues is the development of a new data management system which will come in operation around November 2016.

No data source consistency issues [HALF POINT]

- “Our new Master Data Management system gives us more confidence than ever before in our ability to keep data fresh, avoid duplication...”
- As part of our site visit at NPg, we have understood that the full MDM system will be in place by November 2016. Half a point was awarded for this system is not entirely in place; we expect NPg to improve in this area as a result of their efforts.

Clear evidence of data usage in improving service development and delivery

- “We have taken advantage of this project [data refresh programme] not just to update data but understand how else we can help our customers.”
- “We selected areas with high deprivation indices in health and socio-economic data and where our existing stakeholder networks were weakest.”
- “We combine this quantitative data with discussions with our stakeholders ... in deciding the next phase of the campaign”
- “We try to understand whether projects can deliver more than one objective and the most appropriate geographies – influenced by demographic mapping data including deprivation data.”
- As part of the site visit, we were provided with extensive evidence of plans to improve service delivery based on the development of the new data management system. It will provide increased governance, improved outputs and the ability to coordinate better and tailor service delivery along with partners.

Sub Criteria C – Approach taken to management and use of PSR and associated services Informed by good data analysis, Network Company is proactively identifying vulnerable consumers outside of the “core” groups, fully reflecting fact that vulnerability can be complex and multidimensional.

- “We selected areas with high deprivation indices in health and socio-economic data and where our existing stakeholder networks were weakest.”
- Evidence of NPg reaching out to vulnerable consumers outside the “core” groups is also present in following measures.

Targeted advertising of the PSR and the services offered to vulnerable consumer groups

- “We overlaid on that an approach with our existing networks and to access particular groups – such as Remploy branches to help us reach those with learning difficulties.”
- “Advertising in Able Magazine, the self-styled “leading disability lifestyle magazine to reach disabled consumers.”
- We asked NPg to provide us with more evidence of targeted advertising during the site visit. They showed us radio advertisements part of the winter radio campaign and shared their assessment in picking this method of publicity. They also showed us posters tailored to different audiences among other targeted adverts.

As ‘good’ plus approach reflects that vulnerability may be transitory, providing options for temporary access to PSR and ensuring that those consumers who are no longer eligible are taken off the PSR list.

- In the submission, NPg mentions that vulnerability may be caused by long term or transient conditions, not providing further detail.
- When prompted about this issue during the site visit we were shown the processes in place to address temporary vulnerability (in practical terms on their information systems) and the measures they have taken to bring consumers off the PSR after a set amount of time (which the customer can pick)

Wide range of additional services offered that clearly reflects the specific needs of the “core” eligible groups of consumers

- “Our five Customer Support Vehicles are a longstanding part of our service provision for several years now they have provided the following services:
 - hot water, drinks and snacks
 - a fridge and microwave
 - Charging points and inverters
 - Practical items such as torches, hats, gloves and blankets.”

Detailed analysis of need undertaken which demonstrates how these services reflect the complex and multidimensional nature of vulnerability

- “We have selected these services as those which benefit the most, our more vulnerable customers during a power cut and can be accommodated within a vehicle of this size.”
- When prompted about this issue during the site visit we were shown a full range of services. Importantly we were shown how these services and their details were chosen. They have assessed the results of PSR surveys, feedback from focus groups and their online community to understand the needs of vulnerable consumers.
- As a practical example, they have included foil blankets instead of fleece blankets in their winter warmer packs as a result of this feedback.
- The evidence does not point to a need analysis of *all* PSR consumers.

Sub Criteria D – Approach taken to develop and utilise partnerships to identify and deliver solutions for vulnerable consumers

Clear strategy towards developing partnerships with relevant organisations, and how to utilise these partnerships when they are in place

- “These partners are well positioned and trusted. They give us the platform to build relationships within an environment that our customers feel secure.”
- “We have a structured approach to developing partnerships built on guidance from the Cabinet Office and listening to our stakeholders.”
- “We explore whether delivering this with a partner would increase reach and impact, particularly if resources can be pooled.”
- During the site visit, we were provided with evidence of how NPg screens, sets the objectives and plans the utilisation of these projects. Various pre-project proforma documents were provided showing this evidence.

Network company aware of the limitations of existing partnerships and the wider limitations on the network company in relation to expanding these partnerships.

- Tied to the points discussed above, we found evidence, in the pre-project proforma documents provided of how NPg has identified limitation with the current form of the partnerships and potential limitation is scaling up projects to a wider audience.

Extensive range of partnerships with a wide variety of organisation types.

- NPg partnered with utilities, Citizen Advice, Charities such as Vonne, Nea and the Red Cross, Infrastructure North, Trussel Trust, Bradford Children’s Society, Baywater healthcare and more.

Partnerships provide some support to most groups of vulnerable consumers

- The extent to which many of these partnerships provide *full* and *effective* support is not clear, leading us to conclude that they provide *SOME* support to most groups of vulnerable consumers.

Network company has leading role in the partnerships that it has developed, working together to identify vulnerable consumers and solutions [HALF POINT]

- NPg leads data sharing partnerships with various entities to deliver solutions and identify some consumers, as highlighted in the text above.
- While we believe that NPg uses partnership for more purposes than (solely) data exchange we have not found consistent evidence that they play a leadership role in setting up these partnerships; for this reason, we have awarded half a point for this measure.

Sub Criteria E – Embedding their strategy for addressing consumer vulnerability in their systems, processes and how they manage interactions

Clear feedback loop, with the information captured on consumer needs and vulnerabilities being reflected in network company’s stakeholder engagement strategy, work around the PSR, and its partnership strategy.

- “Our contact centre staff and customer liaison officers receive feedback daily, but we also run surveys twice a year using independent research, we carry out ad hoc surveys.”
- “The data is fed into the Care Quality Indicator (CQI) that we designed to monitor quantitatively how we perform.”
- “In the past year this has led to:
 - Customers registering online having the option of receiving a ‘hard’ copy of the PSR welcome pack
 - Perforated cards in the PSR pack to hand out to friends and neighbours
 - All levels of PSR customer highlighted automatically as part of our planned power cut process.”

As ‘fair’, plus services routinely monitored and evaluated to test extent to which they are meeting consumer needs.

- “The data is fed into the Care Quality Indicator (CQI) that we designed to monitor quantitatively how we perform.”
- “The SROI methodology is based on a measure of proxies for the outcome achieved. This is the first year we have used this model, and the SROI generated will contribute to the benchmark for assessing future projects, including the wider service design and decisions about scale and location of any rollout.”

Network company provides more justification than ‘Fair’, but is not able to fully justify why its chosen actions address social issues relevant to vulnerable consumers.

- Indicators explained above provide justification for how NPg chooses activities, how they produce results and how they cater to the needs of vulnerable consumers.
- “When a proposal comes to us we test it against our Community Investment Strategy to ensure it’s helping to meet one of our strategic objectives. That checks if it represents the best value for money.” This is crucial for Ofgem.

Network company has clear plans to address shortcomings and/or barriers to performance improvement it is currently facing

- During the site visit, NPg has provided evidence of how they intend to build on the feedback of their CQI measure.
- They have shared their long-term goals regarding where they want to be down the line on the particular CQI measure.

- They have shared with us practical plans to improve the impact on PSR consumers during planned power cuts and with the provision of welcome packs.

Consumer service staff trained in identifying and responding to consumer vulnerabilities with a range of network company and partner services selected to meet wide range of consumer needs and circumstances.

- “Although we have guidance documents, we trust and encourage our people to ‘do the right thing’.”
- “Our staff training (developed with Nea and the Red Cross) and ‘secondary roles’ recognise that. It means that understanding of the circumstances of our customers, and in particular those who are suffering most during a power cut, runs throughout the organisation and not just with our frontline staff.”

Evidence that staff have the flexibility available to ‘do right thing’ for any consumer and are empowered to focus on areas where they can be most effective.

- When prompted about the flexibility of their consumer-facing staff NPg has told us that their workforce have total freedom and responsibility and support from the central office in meeting customer needs.
- They provided various examples of how some of this has happened in the past.

Full senior management buy-in to the network company’s strategy in this area

- “[The community Investment Strategy] ensures that we approach all our decisions with a long-term strategic eye. each pillar has individual work programmes tracked and monitored via our internal Social Programme board, chaired by a head of department and with staff from across the business sitting on it.”

WPD - Scoring Sheet

| A : Strategic understanding and commitment to the role that network companies can play in tackling social issues relevant to vulnerable consumers | | | | |
|--|---|---|---|--|
| | Weak | Fair | Good | Excellent |
| <p>A1</p> <p>Understanding of the definition of vulnerable consumer.</p> <p>Awareness of the range of social issues.</p> | <ul style="list-style-type: none"> <input type="checkbox"/> Understanding of vulnerability restricted to general definition of vulnerability. <input type="checkbox"/> Little or no knowledge of what vulnerability looks like for the network company's consumer base. <input type="checkbox"/> General poor awareness of the social issues that vulnerable consumers face. | <ul style="list-style-type: none"> <input type="checkbox"/> Basic understanding of vulnerability across its consumer base. <input type="checkbox"/> Largely focussed on the key vulnerability characteristics. <input type="checkbox"/> Good awareness of the range of social issues associated with the industry relevant to vulnerable consumers in general. | <ul style="list-style-type: none"> <input type="checkbox"/> Network Company aware that there isn't a 'one size fits all' approach to vulnerable consumers. ✓ Good understanding of the main 'vulnerability issues' facing its consumers ✓ Good awareness of the social issues associated with the industry that are most prevalent across its vulnerable cons. base. | <ul style="list-style-type: none"> ✓ Enough flexibility to adapt to differences in vulnerability and changing needs of vulnerable consumers. ✓ Network Company also thinking about issues external to the energy industry which could affect the vulnerability of consumers to energy issues or the utilisation of partner organisations. |
| <p>A2</p> <p>Recognition and integration of role in relation to social issues</p> | <ul style="list-style-type: none"> <input type="checkbox"/> Recognition of social role confined to generalised statements. <input type="checkbox"/> Limited integration into overall business strategy. | <ul style="list-style-type: none"> <input type="checkbox"/> References to social role within strategy but tendency to treat as 'add on' aspects of business strategy and practices rather than integral aspects of service development and delivery. <input type="checkbox"/> Limited used of targets to basic targets to improve performance and increase impact. | <ul style="list-style-type: none"> <input type="checkbox"/> Fully integrated understanding of social role with clear plans for developing systems and consumer facing services to reflect role with targets for improved performance and increased impact. | <ul style="list-style-type: none"> ✓ Delivering on social role a key business driver underpinning design, planning and delivery of all services with core objective to 'make the most of what the network company does' to tackle relevant social issues. ✓ Network company has challenging targets to improve performance and increase impact |

| B: Engagement with stakeholders to improve the data and information that they hold on vulnerable consumers and what they do with it | | | | |
|--|---|---|--|--|
| | Weak | Fair | Good | Excellent |
| B1 Acquisition and Management | <ul style="list-style-type: none"> <input type="checkbox"/> No clear link between network company's stakeholder engagement programme and data acquisition strategy <input type="checkbox"/> Latter largely based on existing PSR and associated PSR 'recruitment' systems <input type="checkbox"/> Basic data and information management strategy in place but not always implemented. | <ul style="list-style-type: none"> <input type="checkbox"/> Clear link between SE programme and the network company's data acquisition strategy, but the former is not fully utilised in the latter. <input type="checkbox"/> Data and information management strategy an integral part of the network company's wider data and information strategies. <input type="checkbox"/> Evidence of good progress in keeping records up to date. <input type="checkbox"/> Awareness of data gaps and processes in place to address these. <input type="checkbox"/> Some consistency between data sources. | <ul style="list-style-type: none"> ✓ SE programme is fully utilised in developing the network company's data acquisition strategy. ✓ Broad and inclusive range of stakeholders are engaged using a variety of appropriate mechanisms. ✓ Data acquisition carried out by the network company in a timely and systematic way. <input type="checkbox"/> Data and information updating strategies working very well.. <input type="checkbox"/> Good progress in closing previously id'fied gaps. <input type="checkbox"/> No data source consistency issues. | <ul style="list-style-type: none"> ✓ As 'Good', plus Stakeholder Engagement programme includes challenging and hard-to-reach stakeholders, using mechanisms fully tailored to meet the needs of various stakeholder groups. |
| B2 Use | <ul style="list-style-type: none"> <input type="checkbox"/> Ad hoc use of data to enhance insight but no strategic approach to consumer insight to enable targeting work to address vulnerability and support social role. | <ul style="list-style-type: none"> <input type="checkbox"/> As 'Weak', plus basic systems in place to keep track of data use and some feedback to data acquisition and management strategies. | <ul style="list-style-type: none"> ✓ Clear evidence of data usage in improving service development and delivery. ✓ Extensive system of use checks across all data and information with evidence of a feedback loop to data acquisition and management strategies. | <ul style="list-style-type: none"> <input type="checkbox"/> As 'Good' plus using data to assess future risk of vulnerability and shape partnerships with other relevant organisations. <input type="checkbox"/> Clear strategy underlying the feedback loop to data acquisition and management strategies. |

C: Approach taken to management and use of PSR and associated services

| | Weak | Fair | Good | Excellent |
|--|---|--|--|---|
| <p>C1 Eligibility and take up of the PSR</p> | <ul style="list-style-type: none"> <input type="checkbox"/> Eligibility for the PSR is largely confined to the “core” eligible groups defined by Ofgem. <input type="checkbox"/> Basic reactive PSR recruitment programme by the consumer-facing services team when contact with a consumer is made who displays possible vulnerable circumstances. | <ul style="list-style-type: none"> <input type="checkbox"/> Well-managed PSR list with some evidence of strategic approach to eligibility outside of the “core” groups. <input type="checkbox"/> Basic advertising of the PSR and the services offered, e.g. posters and leaflets, in key locations linked to vulnerable consumers, e.g. doctors’ surgeries. | <ul style="list-style-type: none"> √ Informed by good data analysis, Network Company is proactively identifying vulnerable consumers outside of the “core” groups, fully reflecting fact that vulnerability can be complex and multidimensional. √ Targeted advertising of the PSR and the services offered to vulnerable consumer groups. | <ul style="list-style-type: none"> √ As ‘good’ plus approach reflects fact that vulnerability may be transitory, providing options for temporary access to PSR and ensuring that those consumers who are no longer eligible (due to temporary nature of their vulnerability) are taken off the PSR list. √ Extensive PSR recruitment programme, drawing on data and information sources to proactively identify and contact eligible consumers. |
| <p>C2 Services offered to consumers on the PSR</p> | <ul style="list-style-type: none"> <input type="checkbox"/> PSR services are restricted to the minimum list of services defined by Ofgem. | <ul style="list-style-type: none"> <input type="checkbox"/> Limited additional services offered with some links to the needs of the “core” eligible groups. <input type="checkbox"/> Network company able to provide basic justification of the practicality of offering these services and how they ‘add value’ for these groups of consumers. | <ul style="list-style-type: none"> <input type="checkbox"/> A wide range of additional services offered that clearly reflect the specific needs of the “core” eligible groups of consumers. <input type="checkbox"/> Detailed analysis of need undertaken which demonstrates how these services reflect the complex and multidimensional nature of vulnerability. <input type="checkbox"/> Some additional services also offered for PSR consumers outside of these “core” eligible groups. | <ul style="list-style-type: none"> – A full range of additional services developed according to detailed needs analysis of all PSR consumers and the nature of their vulnerability. Approach also reflects the fact that vulnerability may be transitory. <input type="checkbox"/> Full justification for how these services add value to the associated group of PSR consumers. |

| D: Approach taken to develop and utilise partnerships (e.g. referral networks) to identify and deliver solutions (both energy and non-energy) for vulnerable consumers | | | | |
|---|--|--|--|--|
| | Weak | Fair | Good | Excellent |
| D1 Overall partnership strategy | <ul style="list-style-type: none"> <input type="checkbox"/> Some links with other services for vulnerable consumers and partnerships to improve cross-referrals, and some participation in referral networks in area when invited. However, no clear strategy. | <ul style="list-style-type: none"> <input type="checkbox"/> Clear strategy towards developing partnerships with relevant organisations, including ideas about what can be achieved from these partnerships in relation to the identification of vulnerable consumers, and identification and delivery of solutions. | <ul style="list-style-type: none"> ✓ Clear strategy towards both developing partnerships with relevant organisations and how to utilise these partnerships when they are in place. ✓ Strategy informed by evidence of benefits of existing partnerships on vulnerable consumers. | <ul style="list-style-type: none"> <input type="checkbox"/> As good, plus fully utilising existing partnerships. ✓ Network company aware of the limitations of existing partnerships and the wider limitations on the network company in relation to expanding those partnerships. – Partnership strategy includes plans to overcome limitations, where possible. |
| D2 Developing partnerships | <ul style="list-style-type: none"> <input type="checkbox"/> Participation in partnerships with a limited range of organisation types, largely within the utility sector. <input type="checkbox"/> Partnerships provided limited support for the “core” groups of vulnerable consumers. | <ul style="list-style-type: none"> <input type="checkbox"/> Wide range of partnerships extending beyond the utility sector. <input type="checkbox"/> Partnerships provide some support to most groups of vulnerable consumers. | <ul style="list-style-type: none"> ✓ Extensive range of partnerships, with a wide variety of organisation types. ✓ Partnerships provide full and effective support for all groups of vulnerable consumers. | |
| D3 Utilising partnerships | <ul style="list-style-type: none"> <input type="checkbox"/> Partnerships largely restricted to referral and signposting. | <ul style="list-style-type: none"> <input type="checkbox"/> Partnerships utilise data and information flows where appropriate, but these flows are largely one-sided and can be infrequent. | <ul style="list-style-type: none"> ✓ Network company has leading role in the partnerships that it has developed, working together to identify vulnerable consumers and solutions. | <ul style="list-style-type: none"> <input type="checkbox"/> As ‘good’, but network company is utilising these partnerships in an effective way to also deliver solutions without creating unnecessary work for the network company. |

| E: Embedding their strategy for addressing consumer vulnerability in their systems, processes and how they manage consumer interactions | | | | |
|--|---|---|---|--|
| | Weak | Fair | Good | Excellent |
| E2 Embedding strategy general systems and processes and awareness of impact and effectiveness of actions. | <ul style="list-style-type: none"> <input type="checkbox"/> Basic reflection of network company's role into general systems and processes throughout the business. <input type="checkbox"/> Very little information therefore provided from consumer-facing services to other business systems and processes. <input type="checkbox"/> Network company able to provide little justification as to why its chosen actions address social issues relevant to vulnerable consumers. | <ul style="list-style-type: none"> <input type="checkbox"/> Clear feedback loop, with the information captured on consumer needs and vulnerabilities being reflected in network company's stakeholder engagement strategy, work around the PSR, and its partnership strategy. <input type="checkbox"/> Network company able to provide basic justification as to why its chosen actions address social issues relevant to vulnerable consumers. <input type="checkbox"/> Basic understanding of any areas where it is currently falling short and could improve its performance. <input type="checkbox"/> Lack of clarity around plans to address shortcoming and/or barriers to performance improvement. | <ul style="list-style-type: none"> <input type="checkbox"/> As 'fair', plus services routinely monitored and evaluated to test extent to which they are meeting consumer needs. <input type="checkbox"/> Feeds into wider service design and other general systems and processes throughout the business. <input type="checkbox"/> Full senior management buy-in to the network company's strategy in this area. <input type="checkbox"/> Network company provides more justification than "Fair", but is not able to fully justify why its chosen actions address social issues relevant to vulnerable consumers. <input type="checkbox"/> Network company has clear plans to address shortcomings and/or barriers to performance improvement it is currently facing. | <ul style="list-style-type: none"> ✓ High level of integration of the network company's role into general systems and processes throughout the business. <input type="checkbox"/> Very clear feedback loop between the monitoring and evaluation of services by the consumer-facing teams to the overall strategy in relation to social issues relevant to vulnerable consumers. ✓ Evaluation not restricted to retrospective assessment of activities or quantitative assessment of activities. ✓ As 'Good', plus network company able to fully justify why its chosen actions address social issues relevant to vulnerable consumers and demonstrate why these 'add value' and are more effective over alternatives. |
| E1 Embedding strategy in managing consumer interactions | <ul style="list-style-type: none"> <input type="checkbox"/> Consumer-facing services and associated processes show only a basic reflection of the network company's social role. <input type="checkbox"/> They do not focus on capturing information to identify vulnerabilities beyond basic PSR recruitment. | <ul style="list-style-type: none"> <input type="checkbox"/> Consumer-facing services routinely capturing information on consumer needs and vulnerabilities to support tailoring of PSR services and work with partners for further support to limited range of services delivered by others. | <ul style="list-style-type: none"> ✓ Consumer service staff trained in identifying and responding to consumer vulnerabilities with a range of network company and partner services, selected to meet wide range of consumer needs and circumstances | <ul style="list-style-type: none"> – As 'good' with social role a key aspect of consumer services and front-line staff training and service design, with all front-line staff trained to identify and record consumer vulnerability with access to a wide range of responses developed and available to support consumers. ✓ Evidence that staff have the flexibility available to 'do right thing' for any consumer and are empowered to focus on areas where they can be most effective. |

Ofgem Reference Scoring Points

| Weak | Fair | Good | Excellent |
|-------------|-------------|-------------|------------------|
| Below 6 | 6-7 | 8 | 9-10 |

Final Assessment of WPD Performance

| SECV Sub-Criteria | Score | Mark |
|--------------------------|--------------|-------------|
| A | 9/10 | Excellent |
| B | 8.5/10 | Good |
| C | 8.5/10 | Good |
| D | 8.5/10 | Good |
| E | 9/10 | Excellent |

Evidence-based Review

Sub Criteria A – Strategic understanding and commitment to the role that network companies can play in tackling social issues relevant to vulnerable consumers

Enough flexibility to adapt to differences in vulnerability and changing needs of vulnerable consumers

- “It is designed [their strategy] to enable WPD to address social obligations in relation to a broader group of customers, who are vulnerable for reasons ranging from ‘permanent and transient vulnerabilities to a power cut’ to ‘energy affordability’ to fuel poverty.”

Good understanding of the main vulnerability issues facing its vulnerable consumers

- “Interests represented range from health and fuel poverty, to resilience, to government policy. Members include an NHS Trust, Warm Wales, the National Energy Foundation, British Red Cross, Citizens Advice, Energy Saving Trust, parish councillors, a gas distribution network (National Grid) and a supplier (British Gas)”
- An extensive number of local stakeholders are taken into consideration to understand consumer base issues

Good awareness of the social issues associated with the industry that are most prevalent across its vulnerable consumer base

- In their part 3 SECV submission to Ofgem, WPD highlights that it works with a range of stakeholders to identify vulnerable customers, examine the range of social issues facing their customers and co-deliver projects.

Delivering on social role a key business driver underpinning design, planning and delivery of all services with core objective to ‘make the most of what the network company does’ to tackle relevant social issues.

- In the words of the WPD Chief Executive: “Engagement is not something WPD do simply in the run-up to a Business Plan submission. It is embedded in our culture and I expect all of my managers to be involved.”
- WPD has shown progress in integrating successful projects addressed towards tackling social issues into their ‘business-as-usual’ approach. The ‘Power Up’ initiative is a good example of this trend.
- As part of the site visit, we discussed directed to gauging the level of senior management buy-in and staff ‘going out of their way to do the most’ to help vulnerable consumers. We have understood that senior and executive reach out to the team responsible for consumer vulnerability to promote ideas in which they can improve WPD’s social impact.

Network company also thinking about issues external to the energy industry which could affect the vulnerability of consumers to energy issues or the utilisation of partner organisations.

- We inquired about this point in the site visit and were provided with a list of capabilities they have identified and developed throughout the years and are actively addressing. They broadly focus their actions towards three areas: PSR, Fuel Poverty and Emergencies.

- Among the issues identified under each of these areas, for example, in relation to fuel poverty, WPD have identified and “ensure all projects provide six key fuel poverty interventions”. Three of these were not directly related to the energy industry, including income maximisation (e.g. debt management) and health and wellbeing (e.g. mobility aids and fire safety checks), the latter of which was a new addition in 2016.
- Importantly, we were provided with evidence of how internal processes such as the ‘Horizon Scan’ are used to identify partner organisations to targets the social issues identified and develop new capabilities.

Network company has challenging targets to improve performance and increase impact

- Throughout the Part 3 SECV submission, WPD has demonstrated its challenging targets to improve performance, above all is the new company goal to have zero PSR consumers cut from the supply grid for more than 12 hours. Other examples are the expansion of core PSR programme, building PSR referral networks to inform and enrol new consumers.

Sub Criteria B – Engagement with Stakeholders to improve the data and information that they hold on vulnerable consumers and what they do with it

Stakeholder Engagement programme fully utilised in developing the network company’s data acquisition strategy

- “Targeting customers not already known to WPD, we will fund existing area-based fuel poverty programmes to work collectively to identify and support hard-to-reach customers and refer any eligible for the PSR to WPD.”
- They target vulnerable consumers they have not reached yet by funding and partnering with fuel poverty programmes *which also address social issues* in their area.
- Find more examples of how WPD has fully utilised their stakeholder strategy in acquiring data throughout this section.

Broad and inclusive range of stakeholders are engaged using a variety of appropriate mechanisms

- “We introduced a new text messaging number for deaf and hard of hearing customers to enable two-way conversations to register power cuts and seek updates.”
- Customers were contacted by data cleanse teams and during power cuts to increase data quality. That happened using letters and phones. See page 5. More examples are present throughout this section (i.e. getting in touch with hard-to-reach consumers)

Data acquisition carried out by the network company in a timely and systematic way

- “In 2016, we now have 25 call handlers via two separate teams.”
- “We trained 20 additional Contact Centre staff to support the central cleanse teams during quieter times.”
- “We introduced a new policy to update customer records as part of the proactive calls process to customers during power cuts.”
- In site visit discussions it emerged that WPD has made a commitment to contact PSR consumers once every two years and create two dedicated data cleanse teams originating from their Customer Panel.

As ‘Good’, plus Stakeholder Engagement programme includes challenging and hard-to-reach stakeholders, using mechanisms fully tailored to meet the needs of various stakeholder groups.

- “A key aspect of Ofgem’s vulnerable customer strategy is for DNOs to use innovative approaches to identify hard-to-reach customers. We’ve tested the viability of delivering fuel poverty support via a consortium of existing schemes already working in deprived areas, with customers often unknown to WPD.”
- Evidence was provided during the site visit demonstrating how every PSR referral to WPD that Consortium Partners carried out as part of the pilot project identified customers not already registered on the PSR, needy of help.
- The evidence from the pilot seems to be backed by positive results that are coming from the renewed and expanded version of the Affordable Warmth collaborative outreach scheme. The existence of a wider version of the program whose results are being monitored and analysed gave us reason to award a full point for this measure.

Clear evidence of data usage in improving service development and delivery

- “The number one benefit to improved customer data is that it is enabling a dramatic step-change in our customer service during power cuts.”
- “Up-to-date records enable us to offer standard support services to a greater number of vulnerable customers, including a password protection scheme, a dedicated PSR contact number, crisis packs and bespoke notifications ahead of any planned interruptions.”
- During the site visit, we were told that WPD makes use of social indicator mapping to inform decisions for outreach projects. Fuel poverty referrals, for example, are geographically oriented.
- Furthermore, we have seen during the site visit how better data has enabled WPD to improve their customer satisfaction rating as a result of better prioritisation of consumers. They have increased the number of pro-active calls as a percentage of all call.

Extensive system of use checks across all data and information with evidence of a feedback loop to data acquisition and management strategies.

- “... accurate customer records... enables us to provide targeted information and welfare support during power cuts and to offer additional relevant services such as fuel poverty advice.”
- “We have targeted our PSR data cleanse to the areas worst affected by fuel poverty, using hotspot data developed in partnership with the Centre for Sustainable Energy.”
- “Improved data enabled 123,866 proactive calls to PSR customers during power cuts to provide updates & offer welfare support.”

Sub Criteria C – Approach taken to management and use of PSR and associated services Informed by good data analysis Network company is proactively identifying vulnerable consumers outside of the core groups

- There are numerous examples in WPD’s assessment of how the network company makes use of data to identify groups of customers outside the “core” categories defined by Ofgem. Social Indicator Mapping is one example.

Targeted advertising of the PSR and the services offered to vulnerable consumer groups

- “We have formed effective partnerships to signpost customers to the PSR using leaflets, posters and letters, distributed via GP’s surgeries, Citizens Advice Bureaux, community events and outreach services via the likes of British Red Cross and Age UK.”

As ‘good’ plus approach reflects fact that vulnerability may be transitory, providing options for temporary access to PSR and ensuring that those consumers who are no longer eligible (due to temporary nature of their vulnerability) are taken off the PSR list.

- “Introduced the capability for customers with transient vulnerabilities to join the PSR temporarily for 6, 12 or 18 months. We have implemented new processes and amended our systems to allow registrations for reasons such as new-born children, post hospital recovery or recent bereavement.”
- During the site visit, we were told that currently, their systems sign up temporary consumers for 6, 12 and 18 months depending on the individual’s needs. They are taken off the PSR automatically at the end of that period. WPD is currently working on reaching out to each customer before the end of their temporary inclusion on the PSR.

Extensive PSR recruitment programme, drawing on data and information sources to proactively identify and contact eligible consumers

- “Targeting customers not already known to WPD, we will fund existing area-based fuel poverty programmes to work collectively to identify and support hard-to- reach customers and refer any eligible for the PSR to WPD.” Drawing on partnerships.
- “In 2015 we formed new partnerships with National Grid Gas Distribution (NGGD) and Wales & West Utilities (WWU), who share our geographic footprint. We trialed a process where they gain informed consent from eligible vulnerable customers to directly add them to WPD’s PSR during gas field works.”
- “Engagement with the Welsh Assembly Government, led us to form a new partnership with the South Wales Fire & Rescue Service (SWFRS) to identify and sign- up eligible PSR customers, share data and align our services.”
- “We have devised a new strategic approach – to engage a network of front-line agencies working with vulnerable people to enlist their help to gain informed consent from customers to directly sign them up to WPD’s PSR... we now have agreements in place (or about to go live) with 23 separate organisations in 29 locations.”

Full range of additional services developed according to detailed needs analysis of all PSR consumers and the nature of their vulnerability. Approach also reflects that vulnerability may be transitory. [HALF POINT]

- “Up-to-date records enable us to offer standard support services to a greater number of vulnerable customers...”
- In the case of a power cut, WPD has made a commitment to contact vulnerable consumers within three hours. In this case, they prioritise all PSR customers and “...check they are OK and offer additional support based on their specific needs.”

- While WPD’s approach to providing services to PSR consumers undoubtedly reflects that vulnerability may be transitory, half a point was awarded because we did not find enough evidence in the submission to justify that all of them were based on a detailed needs analysis of all PSR consumers.
- We acknowledge that WPD strives to provide a tailored service to each customer based on their needs and that therefore general need analysis is less relevant in this framework. For the purpose of this report, however, the Ofgem requirements clearly state the need for a detailed needs analysis, hence, the reason for our choice to award half point on this measure.

Sub Criteria D – Approach taken to develop and utilise partnerships to identify and deliver solutions for vulnerable consumers

Clear strategy towards both developing partnerships with relevant organisations and how to utilise these partnerships when they are in place.

- “Approach 1 – WPD referring to partners: Every WPD PSR cleanse call ends with the offer of fuel poverty support. WPD will set up new schemes with expert partners to deliver this support. Partners referring to WPD: Targeting customers not already known to WPD, we will fund existing area-based fuel poverty programmes to work collectively to identify and support hard-to- reach customers and refer any eligible for the PSR to WPD.”
- During the site visit, WPD has shared with us a 6 step approach geared towards *identifying, setting up, developing, monitoring and extend initiatives*. We are satisfied that, in effect, this represents a *clear strategy* towards partnership development.

Strategy informed by evidence of benefits of existing partnerships on vulnerable consumers

- “Historically we have conducted annual research for completed projects, to demonstrate if they were worthwhile. To add more value as a performance management tool, with surveys occurring closer to when the services were provided, we have now introduced monthly satisfaction surveys with 30 customers from each Power Up scheme, to identify immediate improvements.”
- WPD has shared, with us, evidence of how they track and monitor the results of a project and build on it to develop better services.
- Throughout the submission, there is proof of how WPD has controlled output and value for money of different initiatives to inform their strategy. See, for example, the outputs of different ‘Power Up’ initiatives on page 7.

Network Company aware of the limitations of existing partnerships and the wider limitations on the network company in relation to expanding those partnerships.

- “While we have made significant progress, we are aware that there remains more to do. For instance, engaging stakeholders working in the health sector, such as GPs and hospital discharge managers, has proved challenging. This will be a key focus area for our programme in 2016/17.”

Partnership strategy includes plans to overcome limitations where possible. [HALF POINT]

- Related to the previous point – “Our efforts over the last 12 months have given us a solid foundation to build on, having identified a replicable model that is delivering positive outputs for customers.”
- Half a point was awarded. Evidence in the submission points to the existence of plans to overcome limitations however we found no exact, clear plan to do that.

Extensive range of partnerships with a wide variety of organisation types

- WPD has shown, throughout its Part 3 Submission, a large number of partnerships with different companies, in various sectors. Local Authorities, Energy Networks, Energy advice/consumer bodies, Vulnerable customer agencies and Fire and Rescue organisations are on the list.

Partnerships provide full and effective support for all groups of vulnerable consumers

- “To deliver this full range of capabilities, all projects will involve multiple partners with complementary expertise, and be capable of delivering support to customers over the phone and face-to-face. At the same time it is vital customers do not face multiple hand-offs. We, therefore, work with one lead “hub” agency (responsible for supporting the customer end-to-end and reporting on outcomes), who then manage a small network of partners.”
- PSR services are offered to *all* PSR consumers and are tailored to needs.

Network company has leading role in the partnerships that it has developed, working together to identify vulnerable consumers and solutions

- The notion that WPD would appoint a lead agency to deliver a full range of capabilities seems to imply that the distributor takes full leadership for setting up and starting these projects as well for its review and so on.
- We have seen how WPD has led the industry in developing a new common needs code. This initiative follows the establishment of a data sharing partnership with WWU and a data comparison exercise with British Gas.

Sub Criteria E – Embedding their strategy for addressing consumer vulnerability in their systems, processes and how they manage interactions

High level of integration of the network company’s role into general systems and processes throughout the business

- “Engagement is not something WPD do simply in the run-up to a Business Plan submission. It is embedded in our culture and I expect all of my managers to be involved. I make it a priority that Distribution Managers responsible for WPD’s local network facilitate all our core stakeholder workshops.”
- About Customer Panel and Stakeholder Workshops. “As our programme expands, it is vital that we engage regularly with stakeholders to help us to make improvements and deliver the most effective outputs for customers.”

Evaluation not restricted to retrospective assessment of activities or quantitative assessment of activities

- “In 2015, we joined forces with National Grid Gas Distribution, who are tackling the same challenge, to commission joint “willingness to pay” research. The objective was to:
 - Establish customer priorities between a range of service improvements WPD and NGGD can influence.
 - Identify notional monetary values customers place on these levels of improvement.”
- “We are not actually asking customers to pay more, the figures show what they would be hypothetically willing to pay extra per year to see the proposed improvements achieved. This then enables us to judge whether the cost of the actions to deliver improvements, can be achieved for less than the values customers place on them.”

- WPD pays strong focus on value for money and analysing alternatives. This was featured strongly both in the submission and in evidence provided as part of the site visit.

As ‘Good’, plus network company able to fully justify why its chosen actions address social issues relevant to vulnerable consumers and demonstrate why these ‘add value’ and are more effective over alternatives.

- “To ensure our engagement has legitimacy, we adopt a cyclical approach where proposed actions are referred back to our Customer Panel for expert consideration before we publish.”
 - “For the last three years we have also commissioned the Centre for Sustainable Energy (CfSE) to undertake an independent audit of our programme, using the ‘balanced scorecard’ they developed with WPD to assess whether we are addressing relevant social issues in a strategically coherent way”

As ‘good’ with social role a key aspect of consumer services and front-line staff training and service design, with all front-line staff trained to identify and record consumer vulnerability with access to a wide range of responses developed and available to support consumers. [HALF POINT]

- Field staff trained in a variety of approaches to understand and address diverse vulnerability sources on a face-to-face basis. This enables field staff to act as a supporting arm to service staff which works remotely and plays an integral part to identify, record and assess vulnerabilities with a range of actions.
- “Over the last 12 months we’ve built on this, by starting to roll-out face-to-face training for WPD’s 4,700 field staff.”
- WPD relies on an entirely insourced business model. The absence of contractors means that WPD can assure that everyone goes to the same vulnerability training and that the importance of tackling vulnerability resonates appropriately to all corners of their business.
- They are striving to improve their training continuously. New additions are modules on Hi-Jinx and Dementia training.
- Notwithstanding the excellent content of vulnerability training, we understand that not all staff has been trained yet (potentially due to the larger number of employees given an insourced business model). For this reason, solely, we have awarded half a point on this measure.

Evidence that staff have the flexibility available to ‘do right thing’ for any consumer and are empowered to focus on areas where they can be most effective.

- “We know from the many letters of thanks we receive across the company that our field staff regularly come into contact with vulnerable people and go out of their way to help and ‘do the right thing’”
- During the site visit, WPD provided us with over 30 examples of how members of their staff went above and beyond to deliver to the specific needs of a vulnerable customer.

ENWL - Scoring Sheet

| A : Strategic understanding and commitment to the role that network companies can play in tackling social issues relevant to vulnerable consumers | | | | |
|--|---|---|---|---|
| | Weak | Fair | Good | Excellent |
| <p>A1</p> <p>Understanding of the definition of vulnerable consumer.</p> <p>Awareness of the range of social issues.</p> | <ul style="list-style-type: none"> <input type="checkbox"/> Understanding of vulnerability restricted to general definition of vulnerability. <input type="checkbox"/> Little or no knowledge of what vulnerability looks like for the network company's consumer base. <input type="checkbox"/> General poor awareness of the social issues that vulnerable consumers face. | <ul style="list-style-type: none"> <input type="checkbox"/> Basic understanding of vulnerability across its consumer base. <input type="checkbox"/> Largely focussed on the key vulnerability characteristics. <input type="checkbox"/> Good awareness of the range of social issues associated with the industry relevant to vulnerable consumers in general. | <ul style="list-style-type: none"> ✓ Network Company aware that there isn't a 'one size fits all' approach to vulnerable consumers. ✓ Good understanding of the main 'vulnerability issues' facing its consumers <input type="checkbox"/> Good awareness of the social issues associated with the industry that are most prevalent across its vulnerable cons. base. | <ul style="list-style-type: none"> <input type="checkbox"/> Enough flexibility to adapt to differences in vulnerability and changing needs of vulnerable consumers. – Network Company also thinking about issues external to the energy industry which could affect the vulnerability of consumers to energy issues or the utilisation of partner organisations. |
| <p>A2</p> <p>Recognition and integration of role in relation to social issues</p> | <ul style="list-style-type: none"> <input type="checkbox"/> Recognition of social role confined to generalised statements. <input type="checkbox"/> Limited integration into overall business strategy. | <ul style="list-style-type: none"> <input type="checkbox"/> References to social role within strategy but tendency to treat as 'add on' aspects of business strategy and practices rather than integral aspects of service development and delivery. <input type="checkbox"/> Limited used of targets to basic targets to improve performance and increase impact. | <ul style="list-style-type: none"> ✓ Fully integrated understanding of social role with clear plans for developing systems and consumer facing services to reflect role with targets for improved performance and increased impact. | <ul style="list-style-type: none"> – Delivering on social role a key business driver underpinning design, planning and delivery of all services with core objective to 'make the most of what the network company does' to tackle relevant social issues. <input type="checkbox"/> Network company has challenging targets to improve performance and increase impact |

| B: Engagement with stakeholders to improve the data and information that they hold on vulnerable consumers and what they do with it | | | | |
|--|--|--|--|--|
| | Weak | Fair | Good | Excellent |
| B1 Acquisition and Management | <ul style="list-style-type: none"> <input type="checkbox"/> No clear link between network company's stakeholder engagement programme and data acquisition strategy. <input type="checkbox"/> Latter largely based on existing PSR and associated PSR 'recruitment' systems <input type="checkbox"/> Basic data and information management strategy in place but not always implemented. | <ul style="list-style-type: none"> ✓ Clear link between SE programme and the network company's data acquisition strategy, but the former is not fully utilised in the latter. ✓ Data and information management strategy an integral part of the network company's wider data and information strategies. <input type="checkbox"/> Evidence of good progress in keeping records up to date. ✓ Awareness of data gaps and processes in place to address these. <input type="checkbox"/> Some consistency between data sources. | <ul style="list-style-type: none"> <input type="checkbox"/> SE programme is fully utilised in developing the network company's data acquisition strategy. <input type="checkbox"/> Broad and inclusive range of stakeholders are engaged using a variety of appropriate mechanisms. <input type="checkbox"/> Data acquisition carried out by the network company in a timely and systematic way. <input type="checkbox"/> Data and information updating strategies working very well. ✓ Good progress in closing previously id'fied gaps. ✓ No data source consistency issues. | <ul style="list-style-type: none"> <input type="checkbox"/> As 'Good', plus Stakeholder Engagement programme includes challenging and hard-to-reach stakeholders, using mechanisms fully tailored to meet the needs of various stakeholder groups. |
| B2 Use | <ul style="list-style-type: none"> <input type="checkbox"/> Ad hoc use of data to enhance insight but no strategic approach to consumer insight to enable targeting work to address vulnerability and support social role. | <ul style="list-style-type: none"> <input type="checkbox"/> As 'Weak', plus basic systems in place to keep track of data use and some feedback to data acquisition and management strategies. | <ul style="list-style-type: none"> ✓ Clear evidence of data usage in improving service development and delivery. <input type="checkbox"/> Extensive system of use checks across all data and information with evidence of a feedback loop to data acquisition and management strategies. | <ul style="list-style-type: none"> <input type="checkbox"/> As 'Good' plus using data to assess future risk of vulnerability and shape partnerships with other relevant organisations. <input type="checkbox"/> Clear strategy underlying the feedback loop to data acquisition and management strategies. |

C: Approach taken to management and use of PSR and associated services

| | Weak | Fair | Good | Excellent |
|--|---|--|---|--|
| <p>C1 Eligibility and take up of the PSR</p> | <ul style="list-style-type: none"> <input type="checkbox"/> Eligibility for the PSR is largely confined to the “core” eligible groups defined by Ofgem. <input type="checkbox"/> Basic reactive PSR recruitment programme by the consumer-facing services team when contact with a consumer is made who displays possible vulnerable circumstances. | <ul style="list-style-type: none"> <input type="checkbox"/> Well-managed PSR list with some evidence of strategic approach to eligibility outside of the “core” groups. <input type="checkbox"/> Basic advertising of the PSR and the services offered, e.g. posters and leaflets, in key locations linked to vulnerable consumers, e.g. doctors’ surgeries. | <ul style="list-style-type: none"> √ Informed by good data analysis, Network Company is proactively identifying vulnerable consumers outside of the “core” groups, fully reflecting fact that vulnerability can be complex and multidimensional. – Targeted advertising of the PSR and the services offered to vulnerable consumer groups. | <ul style="list-style-type: none"> √ As ‘good’ plus approach reflects fact that vulnerability may be transitory, providing options for temporary access to PSR and ensuring that those consumers who are no longer eligible (due to temporary nature of their vulnerability) are taken off the PSR list. <input type="checkbox"/> Extensive PSR recruitment programme, drawing on data and information sources to proactively identify and contact eligible consumers. |
| <p>C2 Services offered to consumers on the PSR</p> | <ul style="list-style-type: none"> <input type="checkbox"/> PSR services are restricted to the minimum list of services defined by Ofgem. | <ul style="list-style-type: none"> √ Limited additional services offered with some links to the needs of the “core” eligible groups. √ Network company able to provide basic justification of the practicality of offering these services and how they ‘add value’ for these groups of consumers. | <ul style="list-style-type: none"> <input type="checkbox"/> A wide range of additional services offered that clearly reflect the specific needs of the “core” eligible groups of consumers. <input type="checkbox"/> Detailed analysis of need undertaken which demonstrates how these services reflect the complex and multidimensional nature of vulnerability. √ Some additional services also offered for PSR consumers outside of these “core” eligible groups. | <ul style="list-style-type: none"> <input type="checkbox"/> A full range of additional services developed according to detailed needs analysis of all PSR consumers and the nature of their vulnerability. Approach also reflects the fact that vulnerability may be transitory. <input type="checkbox"/> Full justification for how these services add value to the associated group of PSR consumers. |

| D: Approach taken to develop and utilise partnerships (e.g. referral networks) to identify and deliver solutions (both energy and non-energy) for vulnerable consumers | | | | |
|---|---|---|---|---|
| | Weak | Fair | Good | Excellent |
| D1 Overall partnership strategy | <p>√ Some links with other services for vulnerable consumers and partnerships to improve cross-referrals, and some participation in referral networks in area when invited. However, no clear strategy.</p> | <p><input type="checkbox"/> Clear strategy towards developing partnerships with relevant organisations, including ideas about what can be achieved from these partnerships in relation to the identification of vulnerable consumers, and identification and delivery of solutions.</p> | <p><input type="checkbox"/> Clear strategy towards both developing partnerships with relevant organisations and how to utilise these partnerships when they are in place.</p> <p><input type="checkbox"/> Strategy informed by evidence of benefits of existing partnerships on vulnerable consumers.</p> | <p><input type="checkbox"/> As good, plus fully utilising existing partnerships.</p> <p><input type="checkbox"/> Network company aware of the limitations of existing partnerships and the wider limitations on the network company in relation to expanding those partnerships.</p> <p><input type="checkbox"/> Partnership strategy includes plans to overcome limitations, where possible.</p> |
| D2 Developing partnerships | <p><input type="checkbox"/> Participation in partnerships with a limited range of organisation types, largely within the utility sector.</p> <p><input type="checkbox"/> Partnerships provided limited support for the “core” groups of vulnerable consumers.</p> | <p>√ Wide range of partnerships extending beyond the utility sector.</p> <p>√ Partnerships provide some support to most groups of vulnerable consumers.</p> | <p><input type="checkbox"/> Extensive range of partnerships, with a wide variety of organisation types.</p> <p><input type="checkbox"/> Partnerships provide full and effective support for all groups of vulnerable consumers.</p> | |
| D3 Utilising partnerships | <p><input type="checkbox"/> Partnerships largely restricted to referral and signposting.</p> | <p>√ Partnerships utilise data and information flows where appropriate, but these flows are largely one-sided and can be infrequent.</p> | <p><input type="checkbox"/> Network company has leading role in the partnerships that it has developed, working together to identify vulnerable consumers and solutions.</p> | <p><input type="checkbox"/> As ‘good’, but network company is utilising these partnerships in an effective way to also deliver solutions without creating unnecessary work for the network company.</p> |

| E: Embedding their strategy for addressing consumer vulnerability in their systems, processes and how they manage consumer interactions | | | | |
|--|---|---|--|---|
| | Weak | Fair | Good | Excellent |
| E2 Embedding strategy general systems and processes and awareness of impact and effectiveness of actions. | <ul style="list-style-type: none"> <input type="checkbox"/> Basic reflection of network company's role into general systems and processes throughout the business. <input type="checkbox"/> Very little information therefore provided from consumer-facing services to other business systems and processes. <input type="checkbox"/> Network company able to provide little justification as to why its chosen actions address social issues relevant to vulnerable consumers. | <ul style="list-style-type: none"> ✓ Clear feedback loop, with the information captured on consumer needs and vulnerabilities being reflected in network company's stakeholder engagement strategy, work around the PSR, and its partnership strategy. ✓ Network company able to provide basic justification as to why its chosen actions address social issues relevant to vulnerable consumers. ✓ Basic understanding of any areas where it is currently falling short and could improve its performance. ✓ Lack of clarity around plans to address shortcoming and/or barriers to performance improvement. | <ul style="list-style-type: none"> ✓ As 'fair', plus services routinely monitored and evaluated to test extent to which they are meeting consumer needs. <input type="checkbox"/> Feeds into wider service design and other general systems and processes throughout the business. <input type="checkbox"/> Full senior management buy-in to the network company's strategy in this area. <input type="checkbox"/> Network company provides more justification than "Fair", but is not able to fully justify why its chosen actions address social issues relevant to vulnerable consumers. <input type="checkbox"/> Network company has clear plans to address shortcomings and/or barriers to performance improvement it is currently facing. | <ul style="list-style-type: none"> <input type="checkbox"/> High level of integration of the network company's role into general systems and processes throughout the business. <input type="checkbox"/> Very clear feedback loop between the monitoring and evaluation of services by the consumer-facing teams to the overall strategy in relation to social issues relevant to vulnerable consumers. <input type="checkbox"/> Evaluation not restricted to retrospective assessment of activities or quantitative assessment of activities. <input type="checkbox"/> As 'Good', plus network company able to fully justify why its chosen actions address social issues relevant to vulnerable consumers and demonstrate why these 'add value' and are more effective over alternatives. |
| E1 Embedding strategy in managing consumer interactions | <ul style="list-style-type: none"> <input type="checkbox"/> Consumer-facing services and associated processes show only a basic reflection of the network company's social role. <input type="checkbox"/> They do not focus on capturing information to identify vulnerabilities beyond basic PSR recruitment. | <ul style="list-style-type: none"> <input type="checkbox"/> Consumer-facing services routinely capturing information on consumer needs and vulnerabilities to support tailoring of PSR services and work with partners for further support to limited range of services delivered by others. | <ul style="list-style-type: none"> ✓ Consumer service staff trained in identifying and responding to consumer vulnerabilities with a range of network company and partner services, selected to meet wide range of consumer needs and circumstances | <ul style="list-style-type: none"> ✓ As 'good' with social role a key aspect of consumer services and front-line staff training and service design, with all front-line staff trained to identify and record consumer vulnerability with access to a wide range of responses developed and available to support consumers. ✓ Evidence that staff have the flexibility available to 'do right thing' for any consumer and are empowered to focus on areas where they can be most effective. |

Ofgem Reference Scoring Points

| Weak | Fair | Good | Excellent |
|---------|------|------|-----------|
| Below 6 | 6-7 | 8 | 9-10 |

Final Assessment of ENWL Performance

| <i>SECV Sub-Criteria</i> | Score | Mark |
|--------------------------|--------|------|
| A | 8/10 | Good |
| B | 8/10 | Good |
| C | 7.5/10 | Fair |
| D | 6.5/10 | Fair |
| E | 8/10 | Good |

Evidence-based Review

Sub Criteria A – Strategic understanding and commitment to the role that network companies can play in tackling social issues relevant to vulnerable consumers

Network Company aware that there isn't a 'one size fits all' approach to vulnerable consumers

- “Given this range of needs, there can be no ‘one-size fits all’ approach ...”

Good understanding of the main vulnerability issues facing its consumers

- “Central to our consumer vulnerability strategy is a clear understanding of what consumer vulnerability looks like in our region.”
- ENWL worked with a vulnerable consumer, Eve, to produce a training video for all its staff on how the DNO's actions impact vulnerable consumers.
- On page 5 of the submission, ENWL shows a clear breakdown of all its vulnerable consumers divided by vulnerability.

Network Company also thinking about issues external to the energy industry which affect the vulnerability of consumers to energy issues or the utilisation of partner organisations [HALF POINT]

- “Understanding the impact that external drivers and events can have on vulnerable customers can really help us to tackle issues external to the sector whilst providing care and tailored support.”
- During the site visit, we were told that in responding to the impact of storms Desmond and Eva, ENWL “had to take both a leadership and integrated approach to responding to social needs of vulnerable consumers”. We were told that the needs of PSR customers informed both preparations and incident response. These are issues related to the energy industry and therefore do not satisfy the requirement of “thinking about issues external to the energy industry”.
- Also during the site visit, ENWL told us that they had changed their policy to ensure never to plan to take off supply to a school during school days. This impacts the fuel poor community on hourly wage rates. Because of this example, we decided to award half a point. Citizen advice informed this choice. While *it works in the right direction*, it is not sufficient to award a full point for this measure.

Fully integrated understanding of social role with clear plans for developing systems and consumer-facing services to reflect role with targets for improved performance and increased impact

- “Supporting consumer vulnerability and embedding understanding of this in our systems, processes and customer interactions is central to our strategy.”
- As seen in their ‘Focused network investment’ section of the submission, they plan to invest in core infrastructure to improve service. When asked about this issue in the site visit, ENWL told us that they see key infrastructure (i.e. hospitals) as vulnerable consumers that, in turn, affect other vulnerable consumers. We have awarded a full point for this measure as *we believe this is a sensible approach with practical impact*.
- They picked vital infrastructure by mapping vulnerabilities.

Delivering on social role a key business driver underpinning design, planning and delivery of all services with core objective to ‘make the most of what the network company does’ to tackle relevant social issues. [HALF POINT]

- “...we provided support in line with a wider social role. Adapting our approach to complex needs in a very challenging environment enabled us to deliver our services in line with the objective of making the most of what a network company does.”
- This issue was addressed in the site visit throughout a variety of questions which were intended to show that ENWL makes the most of what the network company does to address its social role. We believe that the network company has *demonstrated a good understanding* of the vulnerability issues but that it does not as much as the best performers in the industry to integrate this knowledge in the design, planning and delivery of services. We awarded half a point.

Sub Criteria B – Engagement with Stakeholders to improve the data and information that they hold on vulnerable consumers and what they do with it

Clear link between Stakeholder Engagement programme and the network company’s data acquisition strategy but the former is not fully utilised in the latter.

- From an analysis of the submission, it seems that ENWL takes the consumer touch-point opportunities that it creates as part of its Stakeholder Engagement strategy to update PSR data.
- “We also took the opportunity to update our PSR data, as a result of the many conversations we had with customers during this period.”
- Clear but limited link between Stakeholder Engagement programme and ENWL’s data acquisition strategy.
- While we have evidence of the impact that the CRM is having on the identification of vulnerability and tailored service delivery we cannot award a higher grade as this measure is focused on the relationship between the stakeholder strategy and data acquisition.

Data and information management strategy an integral part of the network company’s wider data and information strategies.

- “... a bespoke Customer Relationship Management (CRM) system, which has dramatically enhanced the way we record PSR information and interact with our vulnerable customers.”
- “... our CRM system compiles details of all PSR registered customers in the affected postcode area and raises tasks to ensure outbound phone calls are made to each household.”
- During the site visit, we were able to witness the new CRM system and were provided with numerous examples of its use and impact in understanding vulnerability and progressing service delivery.

Awareness of data gaps and processes in place to address these.

- [referred to Unique Property Reference Number] “It will replace the current methods of property validation and will help improve issues around address duplication, making it easier for us to align PSR data correctly to specific properties.”
- They understand that current methods of property validation create issues in cases where a single meter serves different units or, more often, when a consumer moves.
- During the site visit, ENWL shared with us that as a result of an analysis of national statistics they now understand that they have a low number of deaf customers on the PSR.

No data source consistency issues.

- The new Unique Property Reference Number will ensure that data is consistent throughout the databases used.
- Understanding of the impact of the newly established CRM system with understanding that it efficiently manages data sources to address consistency issues.

Good progress in closing previously identified gaps.

- Building on what ENWL mentioned in their submission about preparing for Unique Property Reference Numbers we have understood that they are making progress in enhancing their Network Management System to accommodate this change.
- They expect that this enhancement will allow them to improve the data and information they hold on vulnerable consumers with far-reaching implications for understanding vulnerability and designing/providing services.

Clear evidence of data usage in improving service development and delivery.

- “Vulnerable customers in affected postcode areas were identified by our new CRM system, and proactive calls were made to 6,500 customers.”
- “In the event of a power outage our CRM system compiles details of all PSR registered customers in the affected postcode area and raises tasks to ensure outbound phone calls are made to each household.”
- “The system allows us to record names and numbers of relatives or carers of the vulnerable customer, so that we can keep them in the loop in the event of a power outage at the customer’s home.”
- As mentioned previously we have gathered information and evidence of how their newly established CRM system is effectively improving service development and delivery.

Sub Criteria C – Approach taken to management and use of PSR and associated services Informed by good data analysis, Network Company is proactively identifying vulnerable consumers outside the “core” groups, fully reflecting that vulnerability can be complex and multidimensional.

- “Our strategy [referred to the use of the PSR and associated services] is informed by good data analysis and includes both broadcast and targeted approaches to recruitment.”
- Further evidence of how the new CRM system is helping to identify proactively vulnerable consumers was gathered during the site visit. They utilised a team of analysts, a breakdown of PSR customers, mapping and other methods to prioritise service delivery, inform the organisation of local resilience days and PSR promotion days among other uses.

As ‘good’ plus approach reflects fact that vulnerability may be transitory, providing options for temporary access to PSR and ensuring that those consumers who are no longer eligible (due to temporary nature of their vulnerability) are taken off the PSR list.

- “We recognise that many customers are only vulnerable for a comparatively short time ...Our CRM system allows us to record an estimated end point for a customer’s vulnerability. Once the time limit has been reached, the system prompts us to phone the customer to check progress and update our records.”
- ENWL has set up subgroups for specific highly vulnerable consumers such as brides to be.

**Targeted advertising of the PSR and the services offered to vulnerable consumer groups.
[HALF POINT]**

- As above the company makes use of this phrase “...targeted approaches to recruitment”. Will look for further evidence.
- Evidence provided for the site visit regarding this particular topic was vague. We have understood that customer data has informed PSR awareness activity, but are unclear of exactly how that entails a more tightly targeted advertising of the PSR. The half point was awarded for the lack of precise evidence.

Limited additional services offered with some links to the needs of the “core” eligible groups

- Referred to a vulnerability training video “[the video] brought to life the complex nature of vulnerability and the need for us to be able to offer tailored service alongside offering which is available for specific needs of the ‘core’ groups of consumers.
- No full list of services was provided. This limited our understanding of the PSR service offering of the network company.

Network company able to provide basic justification of the practicality of offering these services and how they ‘add value’ for these groups of consumers.

- From a review of the Submission, it seems that the justification for services provided is that it meets the vulnerable consumer’s feedback.
- “Our approach has been guided by feedback from vulnerable customers gathered via surveys in 2014/15 and 2015/16.”
- During the site visit, ENWL has told us that by using PSR data they have identified 22 key areas of vulnerability in their region. They have used this to inform their consumer vulnerability strategy and stakeholder engagement approach. This answer focuses, again, on consumer feedback but does not highlight precisely how each service addresses the needs or adds value to the group of consumers it is intended to target.

Some additional services also offered for PSR consumers outside of these “core” eligible groups.

- We understood, during the site visit, that ENWL provides all services to whoever feel vulnerable.

Sub Criteria D – Approach taken to develop and utilise partnerships to identify and deliver solutions for vulnerable consumers

Some links with other services for vulnerable consumers and partnerships to improve cross-referrals, and some participation in referral networks in area when invited. *However, no clear strategy.*

- While ENWL recognises that “Building partnerships with organisations from different sectors helps us engage with vulnerable customers whom we may otherwise struggle to reach”, there seems to be no clear indication of an overarching partnership strategy.

Wide range of partnerships extending beyond the utility sector

- ENWL has partnered with a good number of institutions both inside and outside the energy market. Examples can be seen on page 6 of the submission. These include housing associations, energy saving advice groups, storm resilience partners and others.

Partnerships provide some support to most groups of vulnerable consumers

- From energy saving advice to PSR promotion and the identification of vulnerable consumers, ENWL seems to provide some support to *most* vulnerable consumers. No concrete evidence or data was provided on the measurable impact of these partnerships.

Partnerships utilise data and information flows where appropriate, but these flows are largely one-sided and can be infrequent

- While data sharing partnerships have been established, it is unclear how they work. “We are working with colleagues in other utility sectors to share vulnerable customer data ...”.
- Other partnerships do not seem to focus on data systematic data transfers.
- During the site visit, we were told that ENWL shares data with suppliers on a monthly basis, while the reverse flow happens on a daily basis, as is common throughout the electricity distribution sector. Data sharing with local resilience forums happens on an *irregular* basis, during incidents, this is a two-way flow of data. Finally, ENWL is embarking on a promising project to share data with British Gas on a more regular basis.

Sub Criteria E – Embedding their strategy for addressing consumer vulnerability in their systems, processes and how they manage interactions

Clear feedback loop, with the information captured on consumer needs and vulnerabilities being reflected in network company’s stakeholder engagement strategy, work around the PSR, and its partnership strategy.

- As mentioned for the previous Sub Criteria, ENWL uses consumer feedback to steer its partnerships and services offered.
- In the submission, ENWL highlights how consumer feedback drove the design of their PSR introduction pack.
- In the site visit, ENWL provided evidence of how their new CRM system is addressing stakeholder engagement strategy, work around the PSR and other issues, as mentioned earlier in this section.

As ‘fair’, plus services routinely monitored and evaluated to test the extent to which they are meeting consumer needs.

- During the site visit, ENWL walked us through a variety of new measures they have established about call handling and review.
- Managers carry out, routinely, post call analysis. This allows ensuring the quality of engagement, including empathy and sensitivity in approaching the customer. Furthermore, it allows capturing information on consumer need to inform PSR offering.

Network company able to provide basic justification as to why its chosen actions address social issues relevant to vulnerable consumer

- ENWL mentions that the selected actions mirror the needs of vulnerable consumers as they are the result of the integration of their feedback. In some instances, such as for the Mind Partnership, they also go in depth as to what the benefits are for the individual consumer.
- “...working with MIND to help customer care colleagues interact more effectively with customers who have mental health issues, such as depression and anxiety...training covers issues such as the main types of challenging calls ...”

Basic understanding of any areas where it is currently falling short and could improve its performance.

- A review of ENWL’s submission has highlighted that they would like to promote network investment in areas with high incidence of vulnerable consumers.
- They also highlight that “More needs to be done to increase awareness of the PSR.”

Lack of clarity around plans to address shortcomings and/or barriers to performance improvement.

- “Over the next two years, we will upgrade parts of our network supplying: 42 hospitals, 87 substations in high PSR communities.”
- Regarding increasing awareness, ENWL lays out some past activities to address this issue, but there seems to be no reference to planned undertakings.

Consumer service staff trained in identifying and responding to consumer vulnerabilities with a range of network company and partner services, selected to meet wide range of consumer needs and circumstances

- “...we have rolled out training and awareness-raising programmes to involve the wider workforce and relevant contractors.”
- “...we can effectively identify and record consumer vulnerability and match individual customer’s needs to the range of services we are able to provide”
- “...we provided training to all our site based colleagues to give them skills to recognise signs of vulnerability and the confidence to engage these customers”

As ‘good’ with social role a key aspect of consumer services and front-line staff training and service design, with all front-line staff trained to identify and record consumer vulnerability with access to a wide range of responses developed and available to support consumers.

- ENWL provided training to all site based staff (1,100) to give them the skills to recognise signs of vulnerability and the confidence to engage customers. Focus was paid to the ‘All About Eve’ where the story of a troubled, vulnerable consumer helped the company to spread awareness and improve empathy and sensibility in their outreach activities.
- We were told that staff has complete flexibility when they acknowledge that a vulnerable consumer is in need of specific help. Regarding processes, should extra care be required, the contact centre agent contracts the operations manager to rearrange the schedule of field teams. This has happened during the last year’s powerful storms.
- ENWL is making ample use of partnerships, such as those with MIND to help customer care colleagues interact more efficiently and gently with consumers with mental health issues.

Evidence that staff have the flexibility available to ‘do right thing’ for any consumer and are empowered to focus on areas where they can be most effective.

- “The training also reinforces the responsibility of each colleague to respond flexibly to specific needs to ensure that we do the right thing for each customer.”
- Throughout the site visit the network company provided various examples of how a vulnerable consumer was helped by ENWL’s staff, both on-field and through the contact centre. This included fitting generators for medically dependent consumers, the definition of a storm role for all of ENWL’s staff among other things.

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