

siapartners

FINAL ASSESSMENT

Sia Partners

Independent Report of SECV Part 3 Submissions

July 5, 2017



INDEPENDENT ASSESSMENT OF SECV PART 3 SUBMISSIONS

FINAL ASSESSMENT

Executive Summary

Sia Partners has been commissioned by Ofgem to undertake an assessment of Distribution Network Operators' performance against their Consumer Vulnerability Criteria. This assessment is a component of the annual Stakeholder Engagement incentive process. For this year's process, an independent expert in vulnerable customer service delivery across the utility sector (Helen Charlton) has also been commissioned to assist Sia Partners with the assessment process.

Outline of the assessment process

Scoring criteria and a methodology were established based on the Ofgem guidelines for the issues each submission is required to address. This methodology was agreed with Ofgem and in consultation with each DNO prior to the lodgement of Part 3 submissions. Further details on the criteria and methodology are contained in the body of this report.

Sia Partners assessed each submission against this criterion and developed a list of questions for each DNO. The questions were supplied to each DNO five days prior to pre-arranged meeting between the DNO and Sia Partners.

The meetings with each DNO lasted between 3-4 hours and provided the opportunity to supply additional information on matters raised in the submission and/or clarify issues. It also provided the opportunity for the assessors to follow up on additional issues raised through the questions.

The assessment was then undertaken using the information contained in the submissions and the outcomes from the meeting process. A draft assessment was developed and provided to each DNO for comment. Following the receipt of comments, the assessment was revised in some cases and final scores established, which are contained in the table below.

<i>DNO</i>	<i>Sub-criteria</i>					<i>Total</i>
	<i>A</i>	<i>B</i>	<i>C</i>	<i>D</i>	<i>E</i>	
WPD	9.3	8.8	9.5	9.4	9.3	46.3
UKPN	9.1	8.2	9.4	9.1	9.2	45.0
NPg	9.1	8.3	9.0	9.2	8.9	44.7
SPEN	8.7	7.6	9.2	9.1	8.8	43.4
SSEN	9.0	7.4	8.4	7.3	8.9	41.0
ENWL	7.7	7.4	8.1	5.9	8.2	37.3

The body of this paper contains the detailed assessment of each DNO, a commentary on issues and information on how both the submissions and the meetings with each DNO has influenced the final scores.

Separately to this report, Sia Partners will provide each DNO with a commentary on observations from our assessment. This will focus on both areas of strong performance and where it was considered improvements could be made.

Observations from the 2017 process

Each DNO demonstrated a strong commitment to providing and enhancing services to vulnerable customers. The differences in scores largely reflects variations in the quality of submissions and subsequent supporting evidence to justify the quality of services and outcomes. There is little doubt this incentive process has increased the focus on vulnerable customers and improved outcomes across the sector.

A common theme in this year's process was an increased focus on fuel poverty. Some specific initiatives in this area included referring customers to energy switching services. These services assist vulnerable customers in changing suppliers and moving to cheaper tariffs. Other DNOs preferred to address fuel poverty of vulnerable customers through energy efficiency services. To the extent energy consumption can be reduced, savings can be made and in turn alleviating fuel poverty. There is also benefit to the DNO in reducing electricity consumption because reduced demand (if in significant quantity) places less stress on the network.

Given the emphasis on fuel poverty in this year's process and the expected growth in services across this area in 2018, it may be an area where Ofgem wishes to consider further guidance for DNOs.

Expansion of the Priority Services Register was also a consistent theme. All DNOs were focussed on updating and cleansing its vulnerable customer data on a regular basis. The actual resources devoted to this process and approach differed between each DNO. However, it is an acknowledged priority to have the most accurate customer data as possible.

Ofgem has specified the categories of customers it considers could fall into the vulnerable category. Each DNO is addressing these categories and some have targeted additional customers outside of these categories it considers vulnerable. Some even allow any customer who considers itself vulnerable (whether actually vulnerable or not) to join the PSR. As a result, the growth in PSR customers is to the extent that a high percentage of some DNO customers are regarded as vulnerable.

While to some extent this can be justified, it will be important to ensure appropriate systems are in place to identify the highest priority vulnerable customers. In the event of a major outage, not all those on the PSR will be able to receive the same level of service. Some DNO's address this issue better than other and this could be an issue for additional focus in the 2018 process.

The structure of DNO site visits should also be reviewed. As a general comment, some site visits and the question and answer process was far more valuable than others. The analysis contained in the body of this report reflects these differences, to some extent. In the further direct feedback to each DNO, these matters will be raised.

For the 2018 process, it will be beneficial to provide more information to DNOs on the structure of these meetings and the achievement of expected outcomes. Some site visits were valuable in clarifying information and led to an improvement in the DNO score. In others, it made a limited difference.

Overall assessment

The changes made to the 2017 assessment process has improved the overall administration on the assessment of part 3 submissions. No doubt there will be some disagreement on areas of assessment with some DNOs, however, this analysis has been based on

- 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.



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Introduction

Sia Partners was appointed in 2016 by Ofgem to carry out a DNO consumer vulnerability performance against the *Detailed Consumer Vulnerability Sub-Criteria*.

Following the 2016 process, Ofgem has reappointed Sia Partners to carry out the Part 3 SECV assessment in 2017. In this first section, we set out the assessment methodology that we propose to adopt in scoring DNOs against Ofgem's pre-set criteria indicated in their guidance document.

The proposed methodology builds upon the one used throughout the 2016 process. We have engaged with Ofgem and all DNOs to get feedback on room for improvement and have integrated some of the lessons learned into this year's methodology.

The main changes are summarised below:

- **Addition of a consumer vulnerability expert to the team.** The expert has reviewed and contributed to amending the scoring methodology and will attend site visits along with the Sia Partners team. This insight will allow us to produce a more well-rounded assessment.
- **Increased score granularity.** We will round scores to the nearest tenth (i.e. 6.34 to 6.3) in contrast to the 2016 methodology which was designed to round scores to the closest half decimal (i.e. 6.34 would have become 6.5 instead of 6.3). This method will reduce overlap among DNOs and produce a ranking that more closely reflects relative performance levels.

Methodology

The following is the proposed scoring methodology to be applied to Part 3 SECV submissions submitted to Ofgem by DNOs.

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 requirements* provided by Ofgem as Appendix 2 to their SECV Incentive guidance document. These requirements gave 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 DNOs. For this purpose, we drew a list of characteristics that our methodology needed to meet:

- **Simple** – We will focus on making the results of our analysis clear and easy to read and understand for Ofgem, the DNOs as well as the wider public, including vulnerable consumers.
- **Evidence-based** – Our analysis of DNO performance on their SECV Part 3 Submission will be based exclusively on evidence provided in the submission document or gathered during site visits via questions related to the submission document.
- **Addressing nuanced performance** – We will focus on addressing differences in how DNO performed on specific Sub-Criteria. It is crucial to capture differences in scope and scale of any two similar activities addressing consumer vulnerability needs that DNOs may be undertaking. We keep in mind that effective consumer vulnerability is not solely measured on the scale but rather on impact relative to the needs of each DNO's vulnerable customers.

- **Indicating room for improvement** – We designed an approach which will allow DNOs to understand on which specific areas their performance could improve. *It is important to stress, however, that we will not act as an external advisor but 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.
- **Transparent** – Learning from the 2016 assessment we have agreed along with Ofgem and DNOs that we will engage with the Panel to illustrate the scoring methodology in detail and address any questions regarding the content of the independent assessment report. *It is crucial to note that Sia Partners will not act as a panel member.*

These key principles shaped the way we built and developed our scoring methodology starting from Ofgem’s *Detailed Consumer Vulnerability Sub-Criteria requirements*. They are the result of our discussions with relevant stakeholders both during last year’s process and as a result of our post-assessment engagement. Here is an overview of the feedback we received:

- **Ofgem** suggested we focus on ensuring a constant treatment of DNOs throughout the process of site visits and also place emphasis on simplifying the methodology and the way results were shown and justified.
- **DNOs’** feedback from the 2016 assessment:
 - Independent assessment to indicate room for improvement on specific sub-criteria.
 - More clarity with regards to which parts of the SECV submissions would be taken into consideration for grading.
 - Transparency between scoring pre and post the Panel review of Sia Partners’ independent assessment.

In addition to this feedback, both Ofgem and the DNOs agreed that it would be beneficial to include a consumer vulnerability expert in Sia Partners’ assessment team.

Scoring DNOs Performance – Proposed Approach

We have divided the scoring process into four parts.

Dividing Sub-Criteria into “checkboxes”

The basis of our methodology was provided by Ofgem’s *Detailed Consumer Vulnerability Sub-Criteria requirements*. Each “checkbox” in the scoring sheet (*see page 5-10*) represents a different requirement to be fulfilled by DNOs.

A series of checkboxes is nested under the same grade (i.e. ‘Good’); this allows for a more granular view of DNOs’ performance and also allows each DNO to better understand areas of strength/room for improvement under each Sub-Criteria. To give a practical example, a checked box for “Full Senior management buy-in to the network company’s strategy in this area” indicates good performance under Sub-Criteria E, inversely, a blank checkbox for the same requirement indicates that more work or further evidence has to be provided on this topic.



Assigning weights to different

By providing evidence, DNOs fulfil requirements which are seen by Ofgem as indicating different levels of performance ('Weak' to 'Excellent'). In our assessment, we need to distinguish DNOs that have met 'Excellent' requirements from those that have met lower standards of performance.

To make this distinction, we associated numbers to levels of performance following the scoring guide included in Ofgem's SECV guidance document. We assigned the mid-point of each scoring range to the corresponding level of performance and 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: the mid-point for the 'Weak' category is 3, however setting this as a 'weight' coefficient would have implied that 'Weak' performance would have impacted the final scoring disproportionately. For that reason, based on a review of options we assigned the value 5 to 'Weak'.



Review evidence

Evidence will be gathered from Part 3 SECV submissions, focused on Consumer Vulnerability, as provided by the Ofgem guidance. Should we need clarification regarding evidence provided in this document, we will look to Part 1 & 2 submissions for context as well as asking direct questions during site visits with DNOs. It is important to note that all requests for further evidence will be filed 5 working days ahead of the site visit date, and that each DNO will receive the same amount of time to discuss material (~ 3 hours). The consumer vulnerability expert will join the Sia Partners team in assessing whether the evidence provided is sufficient to satisfy Ofgem's performance requirements.

A full point will be awarded for requirements that we feel are fully satisfied by evidence. 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). Again, we will take into consideration not the absolute scale of a DNO engagement, rather, we will focus on the ability of its activities to effectively address the needs of their most vulnerable customers when deciding to award a full point.



Calculate final score

To get a final score we follow this process for each Sub-Criteria:

1. Multiply the number of boxes ticked (in other words, number of requirements met) by their respective 'weight' (a number tied to each grade as shown above, for example 'Fair' has weight of 7).
2. We add the result of step 1 for each grade (the number of 'Weak' requirements multiplied by '5', *plus* the number of 'Fair' requirements multiplied by '7', *plus* the number of 'Good' requirements multiplied by '8.5' and so on...)
3. We divide the total (the result of step #2) by the sum of requirements met on each sub-criterion (sum of checked boxes for each sub-criterion, in other words).

This yields a 'Final Score' for each Sub-Criteria. Please see below the 'Sample Scoring Sheet' as an example.

Please note: some of the requirements provided by Ofgem 'build on' others included in lower grades (i.e. as an example, see the requirement to achieve and *Excellent* grade on Sub-Criteria B1 – "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"). We decided that when evidence exist to award a point for such a requirement, the checkbox that prequalified this requirement to be achieved (in our example, *Good* under Sub-Criteria B1) is not taken into account in the scoring process. This choice was made since weighting in the final score both of the items would distort final results.

The final process for scoring DNO performance in addressing consumer vulnerability was subject to a trial-and-error approach to the 2016 assessment. 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 details, consistency and simplicity as well as satisfying feedback resulting from the 2016 assessment.

This methodology has been finalised with a contribution by the customer vulnerability expert.

Summary of scores

The following is the final outcome of our independent assessment, based on the evidence provided on Part 3 of DNO SECV submissions as well as that provided during site visits.

<i>DNO</i>	<i>Sub-criteria</i>					<i>Total</i>
	<i>A</i>	<i>B</i>	<i>C</i>	<i>D</i>	<i>E</i>	
WPD	9.3	8.8	9.5	9.4	9.3	46.3
UKPN	9.1	8.2	9.4	9.1	9.2	45.0
NPg	9.1	8.3	9.0	9.2	8.9	44.7
SPEN	8.7	7.6	9.2	9.1	8.8	43.4
SSEN	9.0	7.4	8.4	7.3	8.9	41.0
ENWL	7.7	7.4	8.1	5.9	8.2	37.3

SP ENERGY NETWORKS

INDEPENDENT ASSESSMENT OF NETWORK COMPANY'S PERFORMANCE AGAINST OFGEM'S CONSUMER VULNERABILITY CRITERIA

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 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 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. ✓ 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

Legend

0 Points ✓ 1 Points — ½ Points

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. ✓ Evidence of good progress in keeping records up to date. <input type="checkbox"/> Awareness of data gaps and processes in place to address these. ✓ 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. <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. <input type="checkbox"/> 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"> - 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"> <input type="checkbox"/> 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"> - 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.

Legend

<input type="checkbox"/> 0 Points ✓ 1 Points — ½ Points

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. ✓ 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.

Legend

0 Points ✓ 1 Points — ½ Points

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. <input type="checkbox"/> 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. <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"> <input type="checkbox"/> 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.

Legend

<input type="checkbox"/> 0 Points ✓ 1 Points — ½ Points

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"> ✓ As 'fair', plus services routinely monitored and evaluated to test extent to which they are meeting consumer needs. ✓ 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. ✓ 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"> <input type="checkbox"/> 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.

Legend

<input type="checkbox"/> 0 Points	<input checked="" type="checkbox"/> 1 Points	<input type="checkbox"/> ½ Points
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Ofgem Reference Scoring Points

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

Final Assessment of SP Energy Network's Performance

SECV Sub-Criteria	Score	Mark
A	8.7/10	Good
B	7.6/10	Good
C	9.2/10	Excellent
D	9.1/10	Excellent
E	8.8/10	Good

Assessment of Part 3 Submission - SPEN

Independent Review of DNO Consumer Vulnerability Performance

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 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.

Submission Evidence

- We observe on page 3 that as part of the social indicator mapping exercise the network company took into consideration a wide range of vulnerabilities some of which are issues external to the energy industry. These include financial deprivation, social isolation, ethnic minorities.

Site Visit Evidence

- During the site visit, SPEN shared the set of vulnerability categories on which they hold datasets. These include several issues external to the energy industry such as Ethnicity and Lone parenthood.

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

Submission Evidence

- "Customers may fit into a vulnerability category but the needs of customers in the same category may be very different."
- "Our frontline staff are trained to recognise the subtle differences in each customers' needs. By using data, we can drill down to find the things to tackle, and by talking to consumer groups we can pinpoint the services they need and find partnerships to help make it happen." This statement implies an understanding of the multidimensional and circumstantial nature of vulnerability that is not 'one size fits all'

Targets for improved performance and increased impact

Submission Evidence

- SPEN presents four main targets for 2017 at the bottom of page 10. While we do recognise that these targets can be regarded as challenging and appreciate that they focus on all sub-criteria, there is a lack of detail of how achieving these will improve performance and increase impact.
- A more specific target is the one presented on page 8: "We have embarked on an IT project delivering in 2017 to enhance our customer database giving us the ability to capture the channel for our PSR sign ups". We understand the value of achieving such a target (i.e. the understanding value of services provided).

Fully integrated understanding of social role with clear plans for developing systems and consumer-facing services to reflect role [HALF POINT]

Submission Evidence

- SPEN prioritises asset investments based on its social mapping exercise; this highlights the key role that consumer vulnerability plays in their decisions. No evidence of the impact and extent of investment driven by vulnerability needs was shared during the site visit.

- When talking about their consumer vulnerability strategy, SPEN stresses the importance that this has to all levels of the business and how it is built into the way they work: “There’s a clear line of sight and ownership from our CEO right through the organisation and embedded into staff pay through performance management.”
- While we are convinced that SPEN understands its social role and the impact that it has on a customer, particularly those in a vulnerable situation, we believe the company can do more to show that addressing vulnerability is a key business driver.

Site Visit Evidence

- Specifically, the company was asked on the site visit to explain what material is covered in the Monthly Exec & Senior Management reviews and how the output from these meetings impacts the company’s vulnerability strategy. A flow diagram illustrated the categories of management information provided (customer satisfaction, customer feedback and referral metrics) but did not indicate the kind of strategic criteria/priorities management applies when considering the information; because of this, we have awarded half a point for this measure.

Good understanding of the main ‘vulnerability issues’ facing its consumers

Site Visit Evidence

- SPEN’s vulnerability mapping carried out both in 2015 and in 2016 to inform the network company’s vulnerability strategy, tracks 26 vulnerability categories across each district. We believe that this indicates an understanding of the main vulnerability issues facing the network company’s customers.

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

SE programme is fully utilised in developing the network company’s data acquisition strategy

Submission Evidence

- Regarding field teams (permanent employees along with contractors) visiting customers directly at home, SPEN states: “That’s a chance to ensure our customer information and PSR data is accurate, to sign new vulnerable customers to the register, and to make arrangements for any support they may need.”

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

Submission Evidence

- “We keep our customer data up to date by contacting every customer on our PSR every two years.”
- “...we have checked customer data on every call.”
- “We have three data Sharing Agreements in place covering two GDNs and Home Energy Scotland and to date 600 referrals have been sent and received.”

Evidence of good progress in keeping records up to date.

Submission Evidence

- Evidence provided above also applies to evidence of good progress in keeping records up to date.

Good progress in closing previously identified gaps

Submission Evidence

- “Because we know customers don’t always respond, during 2016/2017 we’ve been working with an external agency reviewing the information related to our 3.5m customers so we can better understand where the gaps in our data might be compared with external data sources.”
- “To identify potential gaps in our Priority Services Register, our social indicator mapping compared customers on our register with national statistics... National data is not available by area for the remaining 35% of the categories made up on our register”
- While it is clear that processes are in place to address the previously identified gaps, the lack of evidence on progress leads us to award half a point on this measure.

Some consistency between data sources

Submission Evidence

- We understand that SPEN is serious about improving the quality of their data - “We have embarked on a programme of work to update and maintain our records in 2017.”

Site Visit Evidence

- There is no evidence of a complete lack of data source consistency issues.

Clear evidence of data usage in improving service development and delivery

Submission Evidence

- “By using data, we can drill down to find the things to tackle, and by talking to consumer groups we can pinpoint the services they need and find partnerships to help make it happen”
- “Basil Volty was the name given to our mobile exhibition unit following a staff competition. It visited hotspot areas identified by our data mapping to promote our PSR and Support Services. All homes in the area received leaflets and a personal visit from a SPEN representative.”

Site Visit Evidence

- The network company stated, during the site visit, that data is being used to carry out bespoke outreach and to improve service to customers as in the case of no IVR wait times for numbers associated with vulnerable customers.

As ‘Good’ plus using data to assess future risk of vulnerability and shape partnerships with other relevant organisations. [HALF POINT]

Submission Evidence

- SPEN used its data to expand their social indicator mapping exercise by commissioning an independent mapping from The Centre for Sustainable Energy.
- This lets the company to improving service development and delivery (i.e. see First Class Service box on page 7: “We took our message straight to the doormat of our most vulnerable communities. Our data mapping led us to the postcodes where the need is greatest and provided information on our PSR and our Support Services”).
- Additionally, this exercise has allowed SPEN to shape partnerships with other organisations to offer what is most needed by vulnerable customers (i.e. on page 5: “Some customers might ask for help, others might not even realise they should. By forging connections with partners at ground level in communities with our data mapping has shown are most in need we can reach both kinds of customers”). However, we awarded half a point given that there is no explicit evidence that the company uses its data to assess future risk of vulnerability among its communities.

Site Visit Evidence

- Further evidence to show how data shapes SPEN's partnerships was provided during the site visit regarding the Jab & Jabber initiative that involved a partnership with community flu shot events in the Dumfries & Galloway area.

As 'Weak', plus basic systems in place to keep track of data use and some feedback to data acquisition and management strategies. [HALF POINT]

Submission Evidence

- We have found no evidence of systems and processes to keep track of data usage and any feedback loop to acquisition and management of this data.
- We have awarded half a point because the network company makes clear use of data gathered to improve service development and delivery; the deficiency is not on the use of data, rather on processes to review its use.

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.

Submission Evidence

- SPEN states that through a more detailed social indicator mapping exercise they "have developed an understanding of the nature, scale and distribution of different types of household vulnerability across our areas".

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.

Submission Evidence

- SPEN states that through a more detailed social indicator mapping exercise they "have developed an understanding of the nature, scale and distribution of different types of household vulnerability across our areas".
- Furthermore, the network company states on page 8 that: "Customers' needs change over time. Sometimes they need a little more support at certain times, such as post-surgery, bereavement or pregnancy. This year we have 928 customers recorded on our systems with a temporary vulnerability. SPEN introduced a process in 2014/15 to help customers with short term needs."

Site Visit Evidence

- During the site visit, SPEN provided evidence that showed their approach to remove temporary PSR sign ups when no longer available. Furthermore, the network company provided clarification on their approach to temporary PSR eligibility by stating that "Temporary/Transient vulnerability can be any need customers have on a temporary basis". Additional examples of temporary vulnerability include 'Broken Leg', 'Heating system failure', 'Short stay homes'.

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]

Submission Evidence

- SPEN offers a wide range of services to customers on the PSR as well as its wider customer base. An exhaustive list of service can be found in the “How we make a difference” box at the bottom of page 5 as well as the “Power down” section which contains services specifically geared towards customers on the PSR.
- The network company recognises that vulnerability may be transitory and states: “Customers can register with us for support for a specific period of time.”
- However, while SPEN states that “Because services are developed using feedback from customers who tell us what they really need, we know they make a genuine difference”, hinting towards a detailed needs analysis, we have not found evidence of such an exercise.

Extensive PSR recruitment programme, drawing on data and information sources to proactively identify and contact eligible consumers. [HALF POINT]

Submission Evidence

- SPEN advertises its PSR and its services aimed at addressing consumer vulnerability through a mix of channels ranging from their partners to ad-hoc events targeted to specific customers.
- “We track what works and what doesn’t. We learn from results and feedback, and adapt partnerships and services based on what we find out.”
- On Jab and Jabber, one of the two ‘tactics’ featured to connect with customers; they state: “Jab and Jabber is a great opportunity to raise awareness of SP Energy Networks, and our PSR amongst patients and frontline health professionals.” It seems that SPEN targets specific surgeries in areas of need identified through data analysis. The Network Company provided evidence during the site visit to show that the Dumfries and Galloway area was identified as ‘their most vulnerable area in [their] 2015 mapping’.
- Additionally, there is an extensive list of outreach activities that SPEN has led over the past year to reach vulnerable customers on Page 7. Notably, SPEN states: “We took our message straight to the doormat of our most vulnerable communities. Our data mapping led us to the postcodes where the need is greatest and provided information on our Priority Services Register and our Support Services.”

Submission Evidence

- During the site visit, the network company provided an overview of its awareness campaign activities. These 9 activities were targeted to hotspot areas based on the 2015 vulnerability mapping exercise which informed activities in 2016.

Scoring Notes

- Overall, we have awarded half a point on this measure because while Jab and Jabber is aimed at signing up relevant customers through targeted outreach, most of the activities mentioned or referenced above are solely aimed at raising awareness of the PSR.

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

Submission Evidence

- On page 5 SPEN states: “Because services are developed using feedback from customers who tell us what they really need, we know they make a genuine difference.”

- From an initial review of its Part 3 submission, we had found no evidence of a detailed analysis of need which demonstrates how these services reflect the complex and multidimensional nature of vulnerability.

Site Visit Evidence

- During the site visit, we prompted SPEN to provide evidence of how feedback from customers has shaped the current set of services offered. The network company provided us with a four-stage process they adopt to review the impact of their services – the process ranges from Research to Customer Feedback, Validation and ends by quantifying the impact made on customers. The research phase looks at how value can be added to customers by asking them about their needs; we consider this to be an analysis of need which demonstrates how services offered to reflect the changing nature of vulnerability.

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. [HALF POINT]

Submission Evidence

- We have found that by utilising data, SPEN can pinpoint which services are most needed in each area. On page 5 they state: “By using data, we can drill down to find the things to tackle, and by talking to consumer groups we can pinpoint the services they need and find partnerships to help make it happen.”
- It is apparent that SPEN has a clear idea of how to utilise partnerships when they are in place. However we have not found any evidence of a short-medium term partnership strategy.

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

Submission Evidence

- “By forging connections with partners at ground level in communities which our data mapping has shown are most in need, we can reach both kinds [those who ask for help and those who do not realise they should] of customer.”
- We observe that SPEN is working with partners to identify vulnerabilities and delivering solutions. However we do not find evidence of a leadership role being played.

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]

Submission Evidence

- We believe that SPEN uses their partnerships to deliver solutions without creating unnecessary work by relying on their local presence for advertisement and service delivery.
- However, given that the network company has not provided evidence of a leading role in these partnerships (a requirement of Sub-criteria D3 for the grade ‘good’) we have awarded half a point of the ‘Excellent’ grade.

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

Submission Evidence

- We note that SPEN has made impressive progress in increasing the number of partners from 10 to 130 in just one year. As a result of the site visit, we must note that SPEN counts a partnership with the same organisation in different areas as a separate partnership.

Site Visit Evidence

- Nevertheless, when prompted to provide a list of the 130 partners during the site visit the company showed that they have partnered with a wide variety of organisation types ranging from Scottish Fire & Rescue, Home care services, charities supporting customers affected by mental health, the Citizens Advice Bureau, tariff switching and befriending services.

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

Submission Evidence

- SPEN offers its vulnerability services to the full consumer base “We expanded the services we offer this year to cover our entire customer base going from a network of 10 partners to 130 to make sure every customer in every postcode can benefit from the same services.”

Site Visit Evidence

- As part of our site visit to SPEN, we gathered the full list of 130 partnerships, and we note that while most of this support effectively most groups of vulnerable customers, there are still some groups, such as people with no qualifications, which are not served by a solution offered by one of SPEN partners. We have therefore awarded a half point for this measure.

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

Submission Evidence

- SPEN highlights some limitations of its existing partnership with flu jab clinics and doctor surgeries. On page 6 they state: “Flu jab appointment times are approximately 2 minutes long and the clinics are heavily attended. So while we successfully encouraged new customers to sign up to our PSR, sign up volumes to the Support Services was lower as we did not have enough time to explain everything without holding up the clinics.”

Site Visit Evidence

- Additionally, during the site visit, the network company presented a process through which they assess partnerships before and after the engagement has taken place.

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

Submission Evidence

- On getting feedback from its vulnerable customers, SPEN states on page 3: “We carry out extensive research to ensure our strategy is based on real feedback from customers and the organisations which support them.”
- Furthermore, SPEN states on page 5: “We track what works and what doesn’t. We learn from results and feedback, and adapt partnerships and services based on what we find out.”

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

Submission Evidence

- We understand that SPEN reviews the impact of its actions on customers to make sure they are indeed addressing consumer needs. On Page 8 they state: “Our quarterly governance meetings review defined criteria, helping us understand how our strategy is working and how it could be adapted.” Then proceed to give an example of how they test this impact.

Site Visit Evidence

- SPEN provided further evidence of the process they use to assess service post engagement. The network companies track a range of metrics ranging from partner and staff feedback on the impact of the services offered to the timeliness of service and the value delivered to customers; this process takes place routinely every six months

Feeds into wider service design and other general systems and processes throughout the business.

Submission Evidence

- “Support for vulnerable customers is embedded in our core processes such as Power Cuts, Planned Investment on our network and Planned Maintenance of our assets. It also shapes our overall strategy and customer service.”

Site Visit Evidence

- The company provided information on Vulnerability Champions during the site visit. We understand that people in this role (1 across each of the 11 district covered by SPEN) facilitate the local roll-out of services and feedback into the company’s vulnerability strategy.

Scoring Notes

- While the company does provide information regarding the systems and processes in place to integrate vulnerability into the business, there is little evidence of the reach, impact and extent of these initiatives on vulnerable customers. The direction is clear, but the outcome is not, on this specific requirement.

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.

Submission Evidence

- “Our training makes sure all staff – from contact teams, field staff to contractors as well as managers – have the right tools to recognise and support customers, particularly those who are vulnerable. Training has been shaped by vulnerability experts and benchmarked against other organisations facing similar challenges.”

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.

Submission Evidence

- From an analysis of SPEN’s Part 3 Submission, it is clear that the company is pro-actively attempting to identify vulnerable customers and alleviate their vulnerability or wider social issues through a wide range of services. However, there lacks evidence of a detailed needs analysis of benefit analysis to highlight how each service benefits each group of customers in a way that other services could not.

Site Visit Evidence

- During the site visit, SPEN stated that through research on customers belonging to 10 different groups of vulnerable customer they were able to identify four new services as being needed by their customers (i.e. Cleaning, Gardening, Household Help, Digital skills education). While we observe that these new services stem from an analysis of the needs of customers, there was no information provided as to why these particular services are needed nor how these services impact upon/reduce customer vulnerability in the context of SPEN's service provision.
- The network company also provided evidence of how it tracks the monetary benefit that stems from its activities in support of vulnerable customers. This also provides justification to support that services are indeed a positive addition to customers. However, it still does not provide any justification of why the form and shape chosen for the action are functional to addressing vulnerability.

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

Submission Evidence

- On page 5 the network company states that it is using data to pinpoint the services customers need 'and find partnerships to help make it happen'.

Site Visit Evidence

- Prompted to provide examples of how SPEN took steps to accommodate different needs of customers, the network company provided three examples of how their call centre and customer facing staff went above and beyond to support vulnerable customers in a time of particular need.

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

Submission Evidence

- One clear plan to improve performance is a technical solution that will allow them to identify the source of PSR sign ups; the positive impact of this technical solution is clear. Others related to improving data, measurements by channel and activities and tacking postcodes with gaps in data are mentioned throughout the submission.

Site Visit Evidence

- As seen in sub-criteria A, the network company does have targets for increased impact over the coming years. During our site visit, we were able to observe that the company is committed to improving the quality and extent of its support to vulnerable customers.

WESTERN POWER DISTRIBUTION

INDEPENDENT ASSESSMENT OF NETWORK COMPANY'S PERFORMANCE AGAINST OFGEM'S CONSUMER VULNERABILITY CRITERIA

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 <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"> <input type="checkbox"/> Fully integrated understanding of social role with clear plans for developing systems and consumer-facing services to reflect role. <input type="checkbox"/> 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

Legend

<input type="checkbox"/> 0 Points ✓ 1 Points — ½ Points

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"> <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. ✓ 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. - 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"> <input type="checkbox"/> 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"> - 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.

Legend

<input type="checkbox"/> 0 Points ✓ 1 Points — ½ Points

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.

Legend

0 Points ✓ 1 Points — ½ Points

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	<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.	<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.	<input type="checkbox"/> Clear strategy towards both developing partnerships with relevant organisations and how to utilise these partnerships when they are in place. <input type="checkbox"/> Strategy informed by evidence of benefits of existing partnerships on vulnerable consumers.	<input checked="" type="checkbox"/> As good, plus fully utilising existing partnerships. <input checked="" 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 checked="" type="checkbox"/> Partnership strategy includes plans to overcome limitations, where possible.
D2 Developing partnerships	<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.	<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.	<input checked="" type="checkbox"/> 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	<input type="checkbox"/> Partnerships largely restricted to referral and signposting.	<input type="checkbox"/> Partnerships utilise data and information flows where appropriate, but these flows are largely one-sided and can be infrequent.	<input type="checkbox"/> Network company has leading role in the partnerships that it has developed, working together to identify vulnerable consumers and solutions.	<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.

Legend

<input type="checkbox"/> 0 Points <input checked="" type="checkbox"/> 1 Points <input type="checkbox"/> ½ Points
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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 checked="" 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 checked="" type="checkbox"/> High level of integration of the network company's role into general systems and processes throughout the business. - 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 checked="" type="checkbox"/> 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"> <input type="checkbox"/> 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 checked="" 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. <input checked="" type="checkbox"/> 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.

Legend

<input type="checkbox"/> 0 Points	<input checked="" type="checkbox"/> 1 Points	<input type="checkbox"/> ½ Points
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Ofgem Reference Scoring Points

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

Final Assessment of Western Power Distribution's Performance

SECV Sub-Criteria	Score	Mark
A	9.3/10	Excellent
B	8.8/10	Good
C	9.5/10	Excellent
D	9.4/10	Excellent
E	9.3/10	Excellent

Assessment of Part 3 Submission - WPD

Independent Review of DNO Consumer Vulnerability Performance

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

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.

Submission Evidence

- We note that WPD has a full understanding of the social role it plays as a network company and is sensible to the wider issues it is uniquely placed to address as such. The company translates this understanding in objectives engraved into its wider business strategy. On page 1 they state: “WPD has 17 social obligations commitments and deliverables within its Business Plan, all of which we are achieving.”
- “We play an essential role in supporting these customers during power cuts, as well as tackling wider issues like fuel poverty and cold homes through our extensive network of partner agencies.”
- “We are committed to tackling not just those issues that we are directly responsible for, but also those that we are uniquely placed to address.”
- On page 4 WPD states that the social mapping exercise plays a part in aiding the network investment decision-making process.

Site Visit Evidence

- Crucially, during the site visit, WPD provided evidence of how, as a result of phone calls to vulnerable customers before a planned shutdown, the network company have altered the timings of shutdowns to avoid dialysis days, funerals or where it is winter, and the customer cannot cope with a cold home. This shows that the company is actively making the most of what the network company does to tackle social issues and accommodate the particular needs of vulnerable 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.

Submission Evidence

- Through its focus on fuel poverty and the wide range of additional services that WPD provides locally through its network of partners, the network company shows their focus on non-energy vulnerability issues.
- On page 2 they state: “WPD now offers extensive support schemes for fuel poor customers. We do so recognising the impact these factors also have on their ability to cope during a power cut and that we are uniquely placed to support them to become more resilient.”

Good understanding of the main vulnerability issues facing its customers

Submission Evidence

- “Listening to stakeholders, we now update our mapping every two years. The analysis informs a better understanding of the nature, scale and distribution of vulnerability across WPD’s network.”
- The network company has a clear view of vulnerabilities down to the substation level thanks to its vulnerability mapping tool.

Enough flexibility to adapt to differences in vulnerability and changing needs of vulnerable consumers. [HALF POINT]

Submission Evidence

- Through targeted training (further discussed on Sub-Criteria E) WPD consumer-facing staff is equipped with both a detailed and wide understanding of vulnerability as well as tools to respond to each consumer specific case.
- While the company focuses its submission mostly around how it addresses fuel poverty, during the site visit WPD provided evidence to show that it has a flexible approach to address vulnerability tailored to each by relying on a flexible understanding of vulnerability and a wide toolkit of services to address it.
- However, we believe that the manner in which the company addresses transitory vulnerability - removing PSR customers automatically at the end of their registration period, without any attempt to check if vulnerability continues - suggested to me that they have a prescriptive rather than flexible approach.

Network company has challenging targets to improve performance and increase impact [HALF POINT]

Submission Evidence

- “To further refine our approach to measuring societal benefit we are now considering approaches in other areas such as Big Society Capital (social investment bank), Social Enterprise UK (industry body) and UK Social Audit Network.” Measuring the direct benefit of WPD’s initiatives and projects to individuals beyond monetary gains such as fuel savings, and to society through wider societal benefits, is a significant next step. It will also be important to test customers’ appetite for the DNO to take responsibility for delivering such benefits.
- “WPD has ... designed an innovative plug-in device to notify us in real-time when vulnerable customers go off-supply - replicating the “last gasp” feature of smart meters...Partnering with a local social housing group, 250 devices have been installed, for 12 months, in an area with no mains gas and above average power cut rates.”
- While we believe that WPD is ambitious in aiming always to improve the impact it has on vulnerable customers, based on a review of their submission and our site visit discussions, we have not awarded a full mark on this measure for the lack of detail provided regarding challenging targets.

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

Data and information updating strategies working very well

Submission Evidence

- Throughout their Part 3 submission, WPD showcases a particular dedication to improving the quality of data they hold on PSR customers. We understand that they are making progress in achieving this goal while the PSR keeps growing; on page 1 they state “In the last two years we have contacted 1.4 million PSR customers to update their details and to offer resilience support, at a time when our register has grown by 30%.”
- “Proactively contacted 691,499 PSR customers - 575,752 via WPD’s proactive data cleanse team to update their records and 115,747 to offer information and support during power cuts.”
“56% of PSR records now updated at the first call attempt.”
- “Introduced a new data removal policy for records we have had no contact with for three years (including missing our cleanse calls).”

- 50.3% of PSR records were updated this in 2016/17 alone.

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

Submission Evidence

- “In March 2017, WPD achieved the huge milestone of surpassing 1.4 million PSR customers proactively contacted. We are achieving our business plan commitment to contact every customer once every two years, at the same time as our PSR has grown by 64% since 2014.”

Site Visit Evidence

- The company stated during the site visit that they purchased some data to achieve a comprehensive view of vulnerability at the substation level.

Good progress in closing previously identified gaps

Submission Evidence

- The network company is aware of gaps in their geographic coverage since they use it to inform new partnerships that may address this coverage.
- WPD states in its submission that it aims to become a one-stop-shop sign-up facility for all parties, this highlights the dedication of the network company towards improving its data quality.
- WPD is aware that: “A key way to improve PSR data accuracy is to facilitate direct sign-ups so we can collect complete data at point of entry” to achieve this WPD “Distributed 250,000 pharmacy bags promoting the PSR and new national ‘105’ power cut line across our region.”

Site Visit Evidence

- Asked to provide evidence to show that the network company is making progress in identifying gaps, WPD provided evidence to identify new partners in areas where they did not have any PSR coverage. This approach led to over 15 new partnerships in areas where the company expects an increase in PSR uptake that will lead to narrowing the identified gaps in data coverage.

No data source consistency issue [HALF POINT]

Submission Evidence

- WPD carried out a “Review of the PSR Policy and creation of a new policy to remove 352,046 out-of-date records (where we have had no successful contact in three years), significantly improving overall data accuracy of PSR.”
- While there is no evidence that consistency has been resolved as a problem we acknowledge that the company is moving towards that direction with meaningful actions.

SE programme is fully utilised in developing the network company’s data acquisition strategy

Submission Evidence

- “WPD has two dedicated data cleanse teams who contact every known PSR customer to update their details, remind them how to contact WPD, offer resilience advice and where appropriate, refer them for practical fuel poverty support from one of WPD’s partnership schemes.”

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.

Submission Evidence

- “We now have 34 WPD referral networks in place to identify hard-to-reach customers, while every PSR customer is offered a referral to one of WPD’s fuel poverty schemes.”

- New in 2016/17 are some approaches that WPD took to identify hard-to-reach customers: “Extensive schemes in place to identify hard-to-reach customers, including new innovative approaches. Explore the benefits of closer co-ordination with the health sector.” When asked to explain this point during the site visit further, the company stated that “With the exception of WPD’s x4 Power Up schemes ... all other schemes are designed to target hard-to-reach customers not already known to WPD”. Innovation is currently underway to work with new partners targeted to young people and identify potential PSR customers around them.
- “We engaged a network of trusted front-line agencies (e.g. local authorities, energy advice/consumer bodies, vulnerable customer charities, etc. to identify hard-to-reach customers and gain their informed consent to directly sign up to WPD’s PSR.”
- “... a key objective of our vulnerability strategy should be to significantly increase the number of direct PSR registrations with WPD rather than via the supplier. This way we can ensure we gather complete and accurate data at point of entry, and then share this with suppliers and other utilities...”

Site Visit Evidence

- During the site visit the company mentioned that WPD’s core insight from stakeholders in this area comes from a four-times a year meeting with the Customer Panel, 270 stakeholders engaged via six events, specialist vulnerability conferences, bilateral partners meetings and customer survey. This approach highlights the broad range of stakeholders engaged by WPD.

Scoring Notes

- Overall, the mechanism used to target this category of customers is partnerships with front-line agencies – this is targeted and tailored to different groups based on insight from WPD’s who’s on the wires social indicator mapping which helps the network company identify hotspot areas for partnership outreach to target different vulnerability groups.

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

Submission Evidence

- WPD carried out data analysis to reveal fuel poor hotspot areas to better target schemes
- “Who’s on the wires’ social indicator mapping conducted to identify vulnerable customer hotspots to better target WPD’s PSR and fuel poverty schemes to highest deprivation areas. “
- “In response to feedback from field staff at our PSR training, in January 2017 we launched a new system for mapping PSR customers. This helps staff to use their handheld devices on site to apply filters on our PSR to identify customers in need and better target our services. This may include providing bespoke communication and advice, as well as offers of practical support.”

As ‘Good’ plus using data to assess future risk of vulnerability and shape partnerships with other relevant organisations [HALF POINT]

Submission Evidence

- “In 2016/17, we have utilised WPD’s social indicator mapping (detailed on page 4) to identify areas with high PSR eligibility but low levels registered.”
- “We also use data to select partners with expertise best suited to target the demographics we are looking to engage. For example, mapping of high fuel poverty deprivation areas, led us to identify energy advice charities to engage in those areas.”

Site Visit Evidence

- The network company provided more detail during the site visit and stated that to identify new partners, they combine hotspot data with a ‘Horizon Scan’ exercise. This process revealed 177 agencies with capacity to partner with WPD.
- Furthermore, the network company stated that they share data coverage gaps with stakeholders to find new scheme that will allow them to fill these gaps.

Scoring notes

- Half point was awarded because, while WPD uses data to shape partnerships, there is no substantial evidence to indicate that the network company uses data to assess future risk of vulnerability.

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

Submission Evidence

- Based on a joint DNO exercise which highlighted the lack of data quality, as well as learning coming from engaging stakeholders via their two dedicated data, cleanse teams, WPD “Introduced a new data removal policy for records we have had no contact with for three years (including missing our cleanse calls).”
- The network company also learned that fewer customers opt to be removed than anticipated during the data refresh, pointing to the fact that vulnerable customers tend to reside in the same areas when one moves out, another one may move in. This is an example of how checks across data feedback to data acquisition and management.

Sub Criteria C – Approach taken to management and use of PSR and associated services

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

Submission Evidence

- WPD set up “34 PSR referral networks established, operating in 44 locations (11 new agencies in 2016/17) to identify hard-to-reach customers not already known to WPD. Contributed to 18,646 direct sign-ups.”
- “In 2016/17, we have utilised WPD’s social indicator mapping (detailed on page 4) to identify areas with high PSR eligibility but low levels registered.”
- “Each “Affordable Warmth” scheme supports 1,000 customers over the winter period. Where they identify customers that would be vulnerable in a power cut they help to sign them up to the PSR directly.”

Site Visit Evidence

- During the visit, the company stated that “The substation vulnerability score is derived by combining Mosaic Public Sector classification data from Experian with data that WPD hold about customers connected to its substation. Data includes 400 variables to classify UK households based on their demographic characteristics, lifestyles and behaviour.” This data is used to identify partnerships and shape projects that lead PSR recruitment.
- Example of this is how WPD partnered with Beat the Cold, a small agency local to the Stoke-on-Trent area, or Cornwall Rural Community Charity. We note that these examples are representative of WPD’s approach that is strongly geared towards fuel poverty; the network company states, in fact, that there is a high correlation between fuel poverty and general power-cut vulnerability (as informed by their expert panel).
- The network company stated that they have identified about 700,000 customers in potential fuel poverty and their schemes have delivered to c. 8,000.

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

Submission Evidence

- WPD engages with customers to review the effectiveness of delivery: “We annually survey 1,000 vulnerable customers after our PSR and fuel poverty services.”
- “[The social indicator mapping] enables us to target our projects to areas of greatest need, ensure we address the most prevalent issues and work with the most appropriate agencies.”

Site Visit Evidence

- The network company stated during the site visit that Willingness to pay research had tested the value to all customers of some potential actions. Furthermore, the company has stated that its WTP exercise was peer-reviewed by the customer panel, it is unclear whether the customer panel made such an assessment about the exercise. The company has also used PWC to provide independent oversight and to benchmark WPD’s approach to valuing the social obligations aspect with other UK and international organisation.

Scoring Notes

- Overall it seems that the network company justifies the value of the services offered via a WTP carried out by directly interviewing customers and centrally and locally analysing verbatim comments (social media also monitored) about service during power cuts, connections and general enquiries. While there is no specific explanation of how services add value to each associated group of consumers we believe that this approach to justifying service value added is robust.
- However, in light of WPD’s strong focus on fuel poverty, we have not found any evidence on the network company’s submission or during the site visit, to suggest that there is indeed a correlation between fuel poverty and vulnerability during power cuts (which is the key type of vulnerability this incentive mechanism is trying to address and is at the heart of a DNO’s social obligation towards consumers suffering from vulnerabilities that may make them more prone to harm in these events). For this reason, we have awarded half a point on this measure.
- As we understand, the WTP research tested WTP for WPD’s fuel poverty relief schemes in the context of an average joint annual household energy bill rather than by reference to WPD’s DNO element of the bill. On the site visit, WPD justified its interventions on the grounds that “We might not be the cause but we are uniquely placed to help and make a difference”.

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.

Submission Evidence

- “[The social indicator mapping] allows us to target our projects to areas of greatest need, ensure we address the most prevalent issues and work with the most appropriate agencies.”
- The social indicator mapping exercise is used to inform the choice of new partnerships for the PSR that will be instrumental in reaching a specific target audience that WPD has identified.
- We have to note that eligibility for fuel poverty support is self-selecting, WPD does not ask customers any qualifying questions – this choice was driven by expert advice and training.

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.

[HALF POINT]

Site Visit Evidence

- When prompted to provide more detail on how WPD approaches temporary access to the PSR and cleanse of temporary customers the company states that: “Customers can be registered for 6 months, 12 months or a timescale manually entered in the notes by the call centre advisor”. Also the company stated that “their record will be removed automatically after that time” since “customers are told at the time of joining that they will need to call back after this time should they wish to stay on the register”.
- There seems to be no procedure in place for WPD to check whether the customer remains vulnerable at the end of the designated period, and to alert the customer to automatic removal at this time (customers may forget they had been told of this when registering). So there is no systematic way of checking whether the customer is no longer eligible; for this reason, we have awarded half a point on this measure.

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.

Submission Evidence

- “As part of the Next Generation Text (NGT) Service we introduced the NGT Lite App - a first in our industry. It allows deaf/hard of hearing customers to communicate directly with WPD via smartphone, tablet or computer. Details about this and two-way texting is being sent to all our deaf/hard of hearing customers.”
- “Generators widely used to provide temporary restoration to PSR customers.”
- “We combined WPD’s new social indicator mapping with power cut frequency rates and off-gas grid data, to target the trial in a deprived area of Walsall. It will therefore benefit customers who are potentially more vulnerable to a power cut than average, as they depend on electricity for power and heating.”

Site Visit Evidence

- The development of resilience guides as a services to Small Medium Enterprise indicates how the company offer services outside what would normally be expected in the context of consumer vulnerability. During the site visit, the network company told us that the guide was produced to stakeholder feedback at WPD’s annual workshops where the company was challenged to do more in addition to its traditional focus on domestic vulnerability and support SMEs through emergency planning support.
- The network company has also provided evidence that, while they do not offer different types of services targeted to customers with different extents of vulnerabilities, they do categorise their PSR customers in three groups (Red, Amber, Green) and segment their proactive response to outages depending on the criticality of need.

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

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

Submission Evidence

- We understand that WPD led the development of a willingness to pay exercise carried out with network company partners: “We therefore invited UK Power Networks and National Grid Gas Distribution to join us to undertake an in-depth willingness to pay exercise and develop a methodology that can be rolled-out industry-wide.”
- WPD assumed a key role in the work undertaken by the Safeguarding Customer Working Group (SCWG) to develop common needs codes used by all parties nationally to identify and register customers:
- “WPD drafted the data sharing privacy impact assessments that will be used by all companies.”
- “WPD also wrote and negotiated the formal change requests required to amend industry dataflows.”

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]

Site Visit Evidence

- WPD confirmed during the site visit that the network company creates each scheme including the operating model, brings together the partners and provides complete funding. This hub model ensures that partners deliver support independently in a way that does not burden the network company.
- We have awarded half point on this measure since it is clear how WPD achieves this aim in addressing fuel poverty but has not provided evidence to support how it does so across the board with all its partners.

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

Submission Evidence

- WPD has a structured approach to propose partnerships: “We have formalised the “offering” we approach agencies with. This helps to engage them by clearly articulating the benefits of direct, consented PSR registration and explaining how this complements their own goals and obligations.”

As good, plus fully utilising existing partnerships

Site Visit Evidence

- Based on evidence provided during site visit discussions we can conclude an important part of WPD’s partnership strategy is identifying organisations to join referral networks that can deliver services to customers in areas that are not well covered (regarding PSR membership) by the company.
- We believe that the six interventions the network company sets for partners delivering fuel poverty schemes are good and an important way of ensuring consistency across their three existing schemes.

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

Submission Evidence

- It is evident from a review of WPD's submission that the network company's partnership strategy is informed by benefits of existing partnerships:
 - WPD has processes in place to ensure that they can measure the benefits of different partnerships. On page 6 they state: "In 2017 we added to this with a new smartphone/tablet app which enables easy PSR registration. This also allows us to track the sign-ups from each agency so we can measure the impact."
 - It is apparent that WPD track the satisfaction, savings and referrals of each 'Power Up' schemes. Examples provided on page 9 and 10.

Site Visit Evidence

- When prompted to explain how the network company has identified its current list of 34 partners from a potential total of 177 agencies (stemming from their Horizon Scan exercise as well as hotspot vulnerability data) WPD mentioned that they had cancelled some partnerships based on their inability to achieve the targets and deliver services in a cost-effective way. This shows an understanding of limitations across its partners.

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

[HALF POINT]

Submission Evidence

- The fuel poverty schemes which are available to every customer registered on WPD's PSR, and to all customers through partners working in WPD's region, include a wide range of services that deliver benefits to customers (as measured by the WTP exercise carried out by WPD). On page 9 the network company states: "Each scheme's partner network must have the capacity and expertise to deliver six key interventions: Income maximisation, Tariff Advice, Energy efficiency, measures, Boiler replacements and heating technologies, Behavioural changes, Health & wellbeing measures.
- These schemes operate under a 'hub' delivery model with 40 partner agencies working across 14 projects, each coordinated by one lead agency. While partners report against the six interventions, WPD stated that it monitors customer satisfaction for "key schemes", using this to drive further improvements. It is not clear whether WPD is taking the opportunity to engage with vulnerable customers through these schemes to enquire whether customers are also satisfied with the range/type of services provided by WPD.

Scoring Notes

- While we understand that WPD provides services other than fuel poverty relief schemes, there is insufficient clarity around which partners support WPD in the delivery of non-fuel-poverty related services. Nor is there clarity on whether and how (other than support during outages), WPD serves customers who may be vulnerable for reasons other than fuel poverty; for this reason, we have awarded half a point on this measure.

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

Submission Evidence

- WPD shows an extensive list range of partnerships on page 9 and 10. These partnerships have been formed to deliver the best possible results for both "Power Up" schemes as well as "Affordable Warmth" schemes and newly established links to health services.

Partnership strategy includes plans to overcome limitations, where possible.

Site Visit Evidence

- During the site visit, we enquired how easy PSR registration through a newly developed smartphone app was going to improve the way WPD measure partnership impact.
- The company stated that they plan to use this insight to continue to improve and grow their referral networks: “We can see which agencies are referring the greatest number of customers and which are referring smaller number ... we can also test the impact of funded partnerships versus non-funded agreements”. WPD added: “Monitoring the number of referrals will enable us to learn from those agencies whose processes are working the best, capturing their best practice and successful processes and sharing them with those agencies referring fewer customers to improve their processes.”
- It is apparent that the company is planning to find and address limitations in its current partnerships and improve their overall partnership strategy through this data.

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

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

Submission Evidence

- The evidence is provided on page 1 of WPD’s submission that the CEO was personally involved in participating or leading some meetings, workshops and panels on the topic of consumer vulnerability. Specific examples of the CEO’s involvement follow:
 - “I attend every WPD Customer Panel and have personally presented our consumer vulnerability strategy and action plan to seek views, priorities and improvements.”
 - “I hosted WPD’s second annual parliamentary reception, seeking support from MPs to promote our Priority Service Register (PSR), which led to a 27% increase in sign-ups.”
 - “I maintain full oversight of WPD’s vulnerability programme by annually reviewing our strategy and action plans, ensuring we have appropriate resources to deliver clear outcomes for customers.”
- Further examples of how a focus on consumer vulnerability trickles down across the organisational structure are provided on page 2: “WPD’s Stakeholder and Social Obligations Manager coordinates the delivery of all projects, and provides detailed, robust monthly performance for WPD’s CEO and Directors.”

Site Visit Evidence

- During the site visit the network company provided evidence that senior managers are responsible for delivering the consumer vulnerability training to all 4,700 staff – each team trained by their Distribution Manager and Team Manager.

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

Submission Evidence

- “We are embedding consumer vulnerability in all of our services, and ensuring it is recognised as part of everyone’s role at WPD.”
- An understanding of the key social role played by DNOs has led WPD to create processes that, using data, enable staff to tailor and target support to each vulnerable customer during emergency: “for example identifying the most critical customers who may need a generator or those who may benefit from welfare support from the Red Cross.”

Site Visit Evidence

- As mentioned in sub-criteria A, during the site visit, WPD provided evidence of how, as a result of phone calls to vulnerable customers prior to a planned shutdown, the network company has altered the timing of shutdowns to avoid dialysis days, funerals or where it is winter, and the customer cannot cope with a cold home. This shows a deep integration of the company's role into the core of the company's processes.

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. [HALF POINT]

Submission Evidence

- "We are embedding consumer vulnerability in all of our services, and ensuring it is recognised as part of everyone's role at WPD."
- "... stakeholders told us, at our workshops, that [customer] data must be easy to use to help improve services for customers."
- "In response to feedback from field staff at our PSR training, in January 2017 we launched a new system for mapping PSR customers. This helps staff to use their handheld devices on site to apply filters on our PSR to identify customers in need and better target our services. This may include providing bespoke communication and advice, as well as offers of practical support."
- "In 2016 we've worked extensively with stakeholders via our Customer Panel, workshops and vulnerability surgeries to make improvements to now embed these [Power Up] schemes into our business as usual."

Site Visit Evidence

- During the site visit, the network company stated that: "The contents [of the WPD crisis pack] are periodically reviewed by WPD's Customer Panel for appropriateness, with a key focus on 'keeping warm' ..."

Scoring Notes

- Overall, only one of the five statements above reflects a feedback loop coming straight from consumer-facing teams. While we recognise that the company seeks to integrate feedback from the evaluation and monitoring of services in some ways, consumer-facing teams are not fully represented; for this reason, we have awarded half point on this measure.

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

Submission Evidence

- WPD leads a willingness to pay exercise to quantify the benefit that services offered have to vulnerable customers: "Our approach to measuring value for money (explained in Part Two, page 3) has developed from carrying out retrospective assessments for a handful of flagship projects to judge that they were worthwhile to now conducting extensive research ahead of all key projects to ensure that we deliver maximum benefits to customers."

Site Visit Evidence

- The network company provided further clarification on how it measures and evaluates its activities during the site visit. WPD stated that "A financial qualitative value is only recorded for 'hard' savings e.g. tariff switch ... In the case of some defined behaviour changes e.g. not overfilling kettles, there are consistent financial values attributed to doing so." The network company also stated that: "for non-quantifiable benefits... e.g. living in a warmer home, the company does not claim any financial value".

Scoring Notes

- Overall, the value of the outcomes delivered by WPD is proven by customer satisfaction research and the WTP exercise. The company complements basic retrospective assessment with commissioned research to ‘triangulate’ results and assess the impact 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. [HALF POINT]

Submission Evidence

- “Through a number of ‘choice experiments’ 1,200 customers, from a range of demographics, were asked to make trade-offs to reveal the value to them of a range of actions and expenditure options we could deliver to achieve service improvements. We are not actually asking customers to pay more – the figures show the intrinsic value to them of the improvements offered and what they would hypothetically be willing to pay to achieve them.”
- Regarding utilising smart meters to support PSR customers, WPD states that:” Surveys at the start and end of the project will identify improvements, measure customer satisfaction and the impact of the fuel poverty support delivered”

Scoring Notes

- Similarly, to what was stated under sub-criteria C, the company has in place an overarching system of engagement (i.e. bespoke interviews with vulnerable customers, review of verbatim from ongoing customer service surveys specific to vulnerable customers, review of social media platforms, Willingness to Pay exercise) that allows them to justify why each service is useful for customers.
- Also, in light of WPD’s strong focus on fuel poverty, we have not found any evidence of the network company’s submission or during the site visit, to suggest that there is indeed a correlation between consumer vulnerability and vulnerability during power cuts (which is the key type of vulnerability this incentive mechanism is trying to address and is at the heart of a DNO’s social obligation towards consumers suffering from vulnerabilities that may make them more prone to harm in these events).
- We have awarded a half point for this measure since there is no evidence that the network company assesses whether actions it takes are more effective over alternatives and a lack of explanation on the link between fuel poverty and consumer vulnerability.

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

Submission Evidence

- “Introduced formal training plans in our Contact Centres that are refreshed annually, enabling better best practice sharing across WPD’s two centres.”

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.

Submission Evidence

- “Introduced new specialist empathy training via Dementia UK and MIND to improve engagement at first point of contact and identify warning signs of vulnerability.”

- “...our initial focus was to ensure Contact Centre staff ... have the skills to deal empathetically with customers, identify warning signs of vulnerability and offer bespoke support tailored to their needs.”
- “Staff have received specialist empathy training to identify triggers and warning signs of customers potentially struggling to afford their energy and heat their homes.”

Site Visit Evidence

- During the site visit the company expanded added that “WPD staff have received expert training including from Dementia UK, Energy Saving Trust, British Red Cross, Citizen advice etc, to pick up on ‘warning signs’ of fuel poverty and vulnerability throughout the call”

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.

Submission Evidence

- “WPD staff follow our customer service commitment to get things right “first time, every time” and take personal responsibility to “do the right thing” for customers. It is vital that staff are empowered with the appropriate knowledge, skills and tools to do this, particularly for vulnerable customers.”
- “feedback at our stakeholder vulnerability surgeries has been clear that training and responsibility for vulnerability must extend to all front-line staff.”
- Demonstrating the flexibility that WPD staff have to accommodate the specific situations around each customer’s vulnerability, the company states on page 9: “we arrange the most convenient time for our partners to contact the customer.”

Site Visit Evidence

- During the site visit, the network company provided examples of how its staff ‘did the right thing’ to support the particular needs of vulnerable customers. The company also stated that: “...in WPD it is part of our culture to respond to the specific needs of any customer including those who are vulnerable as [Business as usual].”

NORTHERN POWERGRID

INDEPENDENT ASSESSMENT OF NETWORK COMPANY'S PERFORMANCE AGAINST OFGEM'S CONSUMER VULNERABILITY CRITERIA

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 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 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. <input type="checkbox"/> 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

Legend

<input type="checkbox"/> 0 Points ✓ 1 Points — ½ Points

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. ✓ 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. <ul style="list-style-type: none"> - 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"> ✓ 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"> <input type="checkbox"/> 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"> - 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.

Legend

<input type="checkbox"/> 0 Points ✓ 1 Points — ½ Points

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. ✓ 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.

Legend

0 Points ✓ 1 Points — ½ Points

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"> <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"> - 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"> <input type="checkbox"/> 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.

Legend

<input type="checkbox"/> 0 Points ✓ 1 Points — ½ Points

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. ✓ 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. - 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. <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.

Legend

<input type="checkbox"/> 0 Points	✓ 1 Points	— ½ Points
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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	9.1/10	Excellent
B	8.3/10	Good
C	9.3/10	Excellent
D	9.2/10	Excellent
E	8.8/10	Good

Assessment of Part 3 Submission - NPg

Independent Review of DNO Consumer Vulnerability Performance

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.

Submission Evidence

- NPg's Make Every Contact Count approach "recognises that not all customers' needs are the same and supports a more personal and tailored experience, as this especially applies to vulnerable customers."
- At the bottom of page 1, NPg provides three real-life examples of how their teams responded and accommodated varying types of vulnerability by delivering an approach that was relevant to the needs of each customer (i.e. organising a generator, tailored communication and different/preferred communication channels)
- "Our vulnerability strategy helps us to recognise, understand and respond to different vulnerabilities in a way that best supports our customers "
- The consumer vulnerability matrix presented by NPg provides a framework for their staff to guide actions that alleviate and address vulnerability under different circumstances. This framework, based on feedback from 42 interviews, reinforces our belief that the network company has a multidimensional understating of vulnerability and is taking steps to address it in this way.

Site Visit Evidence

- During the site visit, NPg provided their definition of vulnerability. The overarching definition is separated into three parts; these cover the standard Ofgem definition with the addition of customers "experiencing vulnerabilities which [NPg] have a legitimate role in addressing, reducing and supporting (see our wider CSR and Community Investment Strategies)". Our view is that this definition is excessively broad, tending to confuse the company's vulnerability strategy/pillar' ("helping us to recognise, understand and respond to different vulnerabilities in a way that best supports the customer") with its other 'social pillars' of affordability, community, education and engagement which provide a framework for its social responsibility activities. So, while the company has certainly shown a multidimensional understanding of vulnerability, we are not fully convinced that the definition provided is underpinned by an understanding of the changing needs of vulnerable customers.

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.

Submission Evidence

- The Making Every Contact Count approach "brings together [NPg's] cross-business strategies for Consumer Vulnerability, Stakeholder Engagement and Customer Experience." By delivering a strategy in unison NPg can deliver a more tailored experience for its most vulnerable customers and hard to reach customers.

- By introducing the social pillars framework, NPg highlights the role that vulnerability strategy plays in impacting wider business strategy, process and planning: “The Social Pillars underpin Make Every Contact Count and the vulnerability strategy, providing a framework to map and anchor our overall corporate and social responsibility activities, partnerships and initiatives, helping us to make the right decisions whilst ensuring that we have a holistic approach to our vulnerable customers and communities.”

Submission Evidence

- During the site visit, the company provided evidence of how the development and implementation of NPg’s vulnerability strategy are featured at all levels across the organisation. Three teams each responsible for the coordination of the strategy, the development of the strategy and its delivery into business as usual processes are led by the Executive team which ensures commitment to vulnerability and the strategy’s alignment to the company’s business plan.

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.

Submission Evidence

- “We operate in communities with diverse socio-economic issues. In the event of a power cut or natural disaster linking vulnerable customers to local groups and frontline, agencies achieve better outcomes. “
- On page 2 of the submission, NPg’s Policy and Markets Director states “We recognise that vulnerability is complex and often co-dependent. Therefore, for any intervention to have a sustainable positive impact, we need to look at issues holistically and avoid the temptation to be superficial and not sustainable. For example, developing life skills like understanding energy bills, negotiating repayment plans and saving on fuel bills.”
- On the top of page 5, NPg shows how they address different types of vulnerabilities with relevant solutions through their social pillars framework. From this table, it is apparent that NPg takes into consideration some issues external to the energy industry such as ethnicity and education.

Network company has challenging targets to improve performance and increase impact

Submission Evidence

- NPg presents targets to increase the impact of its consumer vulnerability strategy on page 10 of their submissions. The network company presents objectives in five different areas from explaining their understanding of vulnerability to developing partnerships. As a whole, we believe that these objectives represent challenging targets set by the company to improve the way it helps vulnerable customers.
- “We will be looking at how we can align this data to our priority service and wider customer data to ensure that we have a holistic picture that informs how we can best deploy our support to those that need it the most.”
- “...we have made a commitment to training 100% of our employees in vulnerability, safeguarding and how to make appropriate referrals.” This point was furthered during the site visit; the company plans to do so via a three-year training programme to start in 2017.

Site Visit Evidence

- On the site visit, NPg described its data cleansing programme as “not chasing volume-chasing quality and accuracy of data” [slide on Data Cleansing-Our Enduring Process].

Scoring Notes

- On page 7 of its submission, NPg states “Our analysis shows that our customers suffer the highest levels of vulnerability of any other DNO in the UK”. On this basis, we would expect to see exponential growth in the PSR (currently stands at 563,765 having started at 614,842 in Dec 2015 before data cleanse).

Good understanding of the main ‘vulnerability issues’ facing its consumers

Submission Evidence

- Through data analysis NPg has understood its customer’s vulnerabilities: “Our analysis shows that our customers suffer the highest levels of vulnerability of any other DNO in the UK”. Based on this understanding they have expanded Ofgem’s definition of consumer vulnerability to create their own.

Site Visit Evidence

- During the site visit, the network company has provided evidence showing that it keeps track of various aspects of vulnerability at the LSOA level across its areas. The mapping exercise keeps track of 450 variables that cover unemployment, health, financial and educational metrics.

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

Data acquisition carried out by the network company in a timely and systematic way [HALF POINT]

Submission Evidence

- On page 3 of its submission, NPg presents its ‘comprehensive Consumer Vulnerability data model’. This includes “over 450 data variables analysed, financial and health indicators, continuously refreshed data, every household on their network has a vulnerability score”.

Site Visit Evidence

- The latter point was reinforced during the site visit to show how data from Experian was being analysed and used to create insight. It is important to note that this data covers NPg’s area as a whole, not only the subset of customers currently registered on the PSR.
- Data acquisition on key data points such as the evolution of the needs of those currently on the PSR as well as their contact information seems to be reliant mostly on outbound and inbound calls whenever these take place; the network company is currently securing its ensuring process on this topic. For the reason mentioned above, we have awarded a half point on this measure.

Data and information updating strategies working very well.

Site Visit Evidence

- The Consumer Vulnerability data model includes “continuously refreshed data”. During the site visit, the network company provided more detail on their data cleansing activities, stating: “We have removed over 310,000 out of date records from our PSR and accepted almost 236,000 new, accurate customers onto the register.”

As ‘Good’ plus using data to assess future risk of vulnerability and shape partnerships with other relevant organisations. [HALF POINT]

Submission Evidence

- NPg uses the Experian household vulnerability data for each LSOA to understand the vulnerability of customers not yet on the register, identify areas with a high concentration of vulnerable customers as well as offering services, through partnerships, to customers in these areas.

- While the company has shown that they use the feedback coming from their research to shape partnerships, there is no evidence provided in the submission or the site visit that points to NPg making use of data held on customers to anticipate future vulnerabilities or shape partnerships with relevant organisations.

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

Submission Evidence

- Throughout its submission, NPg mentions several examples of how data usage is improving the effectiveness of their actions aimed at the vulnerable customer.
- “Using our vulnerability data, we targeted communities in Doncaster, Gateshead, Hull, Barnsley, Grimsby and Leeds, holding roadshow events aimed at educating the communities about who we are, what we do, how they can contact us and promoting our PSR offer.”

Good progress in closing previously identified gaps.

Submission Evidence

- It seems that NPg is making progress towards closing identified gaps: “Having contacted nearly 400,000 customers, we are pleased to say the data cleanse programme is moving into a further phase to support our enduring model.”
- Processes are in place to address data gaps: “We have established a team of PSR coordinators to undertake proactive outbound customer calls, with a letter being sent to those customers we have been unable to contact despite several attempts.”

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.

Submission Evidence

- “Our Social Pillars [presented on see Page 2 of the submission] incorporate and build on these needs codes to ensure we have identified our wider groups of hard to reach customers. This wider model recognises that vulnerability is ever changing in society and for individuals, and allows us to be flexible in responding to these needs, now and in the future.”
- “we take different approaches to identifying, reaching, engaging and supporting the hard to reach dependent on their particular needs and the outcome we are trying to achieve.”
- “we worked with a development partner to engage a number of our rural communities in remote and hard to reach areas to understand their specific needs during a power cut.”

Site Visit Evidence

- Questioned over the reach achieved by the three strands of work shown on page 5, the company informed us that they have reached about 72,000 hard to reach customers by:
 - Working with third sector organisations who have relationships with these customers
 - Working with trusted partners and the customers themselves to raise awareness, communicated and communicate key messages
 - Proactively going out to communities to share info and provide support.

Some data consistency between data sources

Submission Evidence

- We have found no evidence that the company has fully addressed data consistency issues and have therefore decided to award this mark to NPg.

As ‘Weak’, plus basic systems in place to keep track of data use and some feedback to data acquisition and management strategies.

Submission Evidence

- We have found no relevant evidence in NPg’s submission or during the site visit to suggest that the company has systems in place to keep track of data usage.

Site Visit Evidence

- During the site visit the company stated “The industry change in the D0225 process as of June 2017, has provided us with a number of rules we can apply to our data to help us manage it better and in theory this means we can ‘restart the clock’ when new information is received from electricity suppliers for a household”. We believe that this represents a standard approach to PSR data management.

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

Submission Evidence

- “Using the census data to target our PSR partnerships and promotions to reach the key groups of customers by type of vulnerability.”
- “Using the Experian household vulnerability score to help prioritise our services, for example prioritising where our customer care vehicles are sent and where generators can be best deployed.”

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.

Site Visit Evidence

- During the site visit, the network company states that all the services available to permanent PSR customers are available to temporarily vulnerable customers. PSR sign up is available to all customers who ‘might just be experiencing a life changing event which has temporarily left you feeling more vulnerable’.
- NPg finds temporarily vulnerable customers by targeted promotion, an NHS dataflow (limited in its reach), through partnerships. Furthermore, customers can register as being temporarily vulnerable on their website and choose the length of time they want to remain on the register. There is an automatic renewal notice generated at the end of the period to alert the customer to the expiry of the registration period, providing the opportunity to remain on the register if vulnerability continues.

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.

Submission Evidence

- “Vulnerable customers asked us to stay focused on the provision of partnerships and services aligned to these must-have needs before expanding the offer into other less essential areas.”

- “This insight has informed the creation of our vulnerability needs assessment, which helps our Contact Centre colleagues to target the essential help, at the right time, matched to each individual’s needs during a power cut.”
- At the bottom of page 3, NPg shows a detailed needs assessment which breaks down the response of vulnerable customers to service interruptions and segments their response both by the length of the power cut as well as the type of response (i.e. Critical Need, Emotional Need, Comfort Need). Based on this analysis they propose examples of different services offered to customers depending on the length of power cuts. These range from regular updates to alternative accommodation; we believe this sample represents a full range of additional services developed according to detailed needs analysis.
- “Insight gained through in-depth engagement and research with over 1,500 existing PSR customers across all vulnerabilities has helped us start delivering an individualised and tailored approach for our vulnerable customers.”
- On the ‘Outcomes’ section of page 4, NPg shows how they acted on the feedback that vulnerable customers gave on the services offered. This section highlights more services offered by the network company.

Site Visit Evidence

- During the site visit the company confirmed that all the services they offer are available on a need by need basis to all customers, this includes customers who are temporarily vulnerable.

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

Submission Evidence

- “Expanded our wide-reaching PSR marketing activities to focus on our Community Investment Areas.”
- “[The Golden Guide, providing comprehensive information, advice and guidance on energy saving] was advertised within a referral magazine that targets older people living independently at home to ensure copies reach those vulnerable people who need the information most. The initial feedback has been very positive.”

Site Visit Evidence

- During the site visit, NPg states that ‘...vulnerability mapping analysis has enabled us to identify and target the most vulnerable areas within our license areas across each of our nine zones’. Based on this data, NPg carried out some campaigns including targeted bus campaigns, direct mail to promote PSR, community roadshows, target schools to deliver safety talks.

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

Submission Evidence

- The needs analysis shown by NPg on the bottom of page 3 provides, in our opinion, a demonstration of why different types of actions add value to customers suffering from differing types of vulnerabilities.

Site Visit Evidence

- During the site visit, the network company commented that this the vulnerability matrix provides a framework for its staff to use in responding to vulnerability across different scenarios, however, call centre and field staff have full flexibility to address customer needs on a case-by-case basis.
- One example follows: “Mr A was provided with dehumidifiers, a winter warmth pack and light bulbs, as well as advice on heating the house better and ventilating properly. In both cases, Green Doctor contacted their social housing provider to reach a solution.”

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

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

[HALF POINT]

Submission Evidence

- One of NPg’s objectives for the 2016/2017 year was to ensure that “... PSR registration on is accessible for all”. During the site visit the company clarified that the full range of services offered is open to all customers on the PSR; from this, we can infer that through partnerships NPg is effectively supporting all groups of vulnerable customers.

Site Visit Evidence

- The network company is offering services tailored to all the ‘standard’ groups of vulnerable customers it has identified (i.e. Mental health, old age) and has given evidence to show it goes above and beyond to accommodate the needs of each vulnerable customer as needs arise.

Scoring Notes

- Overall, we believe that partnerships to raise awareness and (e.g. Red Cross) providing support during outages do apply to ‘all groups’. However, the partnerships on p. 7-9 of the company’s submission seem to be focussed predominantly on energy efficiency projects and energy saving schemes. It is unclear how these are ‘tailored’ to different groups of vulnerable customers to be effective to all groups of vulnerable customers; for this reason, we have awarded half a point on this measure.

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

Submission Evidence

- Customers have requested that NPg “stay focused on the provision of partnerships and services aligned to these must-have needs before expanding the offer into other less essential areas.” This informs the direction of NPg’s partnership strategy.
- Informed by feedback from vulnerable customers, stakeholders and partners NPg has developed the following approach to partnerships: “Working with third sector organisations who already have relationships or are seen as trusted channels within hard to reach communities to offer enhanced services and support...” and “Working with trusted partners and hard to reach communities to understand how we can best communicate key messages, raise awareness and signpost further support....”
- Other evidence suggested that although NPg is willing to explore different partnerships to deliver varied schemes, the strategy which drives the choice of partner and type of project/scheme may not be clear and robust.

As ‘Good’, plus fully utilising existing partnerships [HALF POINT]

Submission Evidence

- On the ‘Developing our partnerships’ section of page 6 NPg shows a clear approach to utilising existing partnerships. By splitting these into three main categories (i.e. Strategic, Project and Imitative partnerships), the network company has a clear approach on how to utilise partnership to the fullest.
- Furthermore, as shown on the top of page 7, NPg has a general five-step approach from the conceiving to embedding and enhancing partnerships.

- We are convinced that NPg has the necessary processes and plans in place to move towards utilising their partnerships in full. However there is no evidence of the network company currently doing so. Hence, we awarded half point for this measure.

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

Submission Evidence

- “As well as working closely with charities, community and other third sector organisations, we also have strong and very active partnerships with other utilities in our region, recognising that we often have shared customers with similar vulnerabilities and needs.”

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

Submission Evidence

- Recognising the limitations - varying capacity and capability of our third sector partners to measure and report activity and outcomes has impacted our approach to Social Return on Investment
- “Some of our smaller third sector partners do not have the capacity or capability to deliver the detailed reporting required to achieve full SROI, but the added value they bring is evident from the quantitative and qualitative data they do provide.”

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

Submission Evidence

- When asked to provide further information on the limitations NPg had identified in existing partnerships, the company stated that: “We know that some smaller community/third sector organisations struggle to provide as comprehensive measures as lends itself to SROI, so we are working with partners to identify what is possible on a project by project bass to help us measure and report effectively”
- This indicates that the network company has plans to overcome limitations they have identified; we have awarded a half point for the lack of detail in how the company plans to ‘work with partners’ and what they aim to get out of this collaboration they mentioned.

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]

Submission Evidence

- Working with other regional utilities (Northern Gas Networks, Northumbrian Water and Yorkshire Water) allows us to share resources to reduce duplication, maximise efficiency and deliver coherent messaging and support for our shared vulnerable customers.
- While we are convinced that some of NPg’s partnerships are being utilised so as to deliver solutions without creating unnecessary work, the evidence is insufficient to award a full mark on this measure.

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

Feeds into wider service design and other general systems and processes throughout the business.

Submission Evidence

- The chair of the Social Issues Expert Group (SIEG) states that over the past four years the company has experienced great progress in “formalising and operationalising the vulnerable strategy”. The Make Every Contact Count approach has become embedded in the hearts and minds of staff at large.
- On expanding Ofgem’s definition of consumer vulnerability, NPg says: “These definitions have provided direction for a number of our research and analysis activities that are now shaping our services, partnerships and initiatives.”

Site Visit Evidence

- During the site visit, as referenced for sub-criteria A, the company provided us with evidence to support how the vulnerability strategy is coordinated, developed and implemented by teams that report to the Central Executive team which in turn, ensures commitment to the delivery and alignment of the vulnerability strategy to the company’s business plan.
- The ‘Making Every Contact Count’ programme aims to instil a spirit of everyone being committed to doing the right thing and being empowered to do what it takes to make a difference to vulnerable customers. This piece of cultural change or rather, cultural focus on customer service, is not solely focused on consumer vulnerability but it surely points in an encouraging direction where all staff is empowered and encouraged to make the difference.

Scoring Notes

- While we are convinced that the network company is moving in the right direction to integrate vulnerability in its general (companywide) systems and processes we have not found any particular evidence that points to how such processes and systems have been shaped by NPg’s understanding of vulnerability up to this day.

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

Submission Evidence

- Throughout its submission, NPg includes quotes from senior members of its organisation (i.e. Policy and Markets Director, Head of Smart Metering, Operations Director) on topics relating to their understanding of vulnerability or work to support vulnerable customers. We have awarded a half point given that, apart from these quotes, we did not find further evidence of full senior management buy-in.
- “Each session [of the Make Every Contact Count roadshows] was supported by a member of the Executive Team, with over 1,000 employees engaged so far, each signing up to make a positive difference to our vulnerable customers.”

Site Visit Evidence

- Evidence provided during the site visit highlighted the central role that the executive team of NPg plays in ensuring the commitment to the delivery of the vulnerability strategy as well as its fit into the business plan.

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.

Submission Evidence

- From the ‘Social Pillars’ table on page 5, it is apparent that the network company has chosen actions that are relevant to addressing different types of vulnerability. At the same time, there is no evidence of any assessment carried out to demonstrate why actions chosen are more effective over alternatives.
- Across the ‘Strengthening our programme through partnerships’ section of the submission, NPg shows direct and indirect benefits to vulnerable customers of some partnerships at different stages of development. However, there is no reference to how alternative approaches could have delivered different results.

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. [HALF POINT]

Submission Evidence

- “Our Louder than Words™ assurance and accreditation has assured us that we are taking the right approach to supporting this vulnerable group but that we can strengthen this through additional training for our colleagues”

Site Visit Evidence

- During the site visit, the network company provided evidence of a loop starting from customer engagement, going through customer feedback and culminating in customer insight. While we are convinced that this process represents a clear feedback loop that informs NPg’s strategy about social issues relevant to vulnerable customers, the evidence provided points to only two engagements that are tailored to vulnerable customers (Explain research, in-depth vulnerability interview with 42 customers). Given the limited evidence, we have awarded a half point on this measure.

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

Submission Evidence

- “Our staff are the people living and working in our communities and our ambassadors as they deliver our services every day. Equipping and engaging them to recognise and understand the issues facing many of our customers is essential.”
- Training in 2016 targeted specific vulnerability training for contact centre staff such as a Red Cross training in vulnerability, deaf awareness training as well as awareness raising. While the company is planning to train 100% staff and contractors in vulnerability, referrals and safeguarding this three-year program has not yet started. At the moment, contractors do not have access to vulnerability training.
- Other training includes cultural awareness through the ‘Make Every Contact Count’ programme. While this is a welcomed development and contributes to instil a vulnerability focused culture at NPg, no tools and methods are provided to deal with specific vulnerabilities.

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.

Submission Evidence

- “We are delivering this through engagement, training and our volunteering programme, giving [the staff] the right tools and the autonomy to do the right thing for our vulnerable customers.”

Site Visit Evidence

- Site visit discussions highlight that the ‘Make Every Contact Count’ program aims to ‘maximise the potential of every single interaction with every stakeholder, customer or vulnerable customer’. From the perspective of NPg’s staff, this program highlights that the company actively encourages doing the right thing for customers on a case-by-case basis.
- During the site visit, NPg provided several examples of how staff members have gone above and beyond to ‘do the right thing’ for vulnerable customers.

Evaluation not restricted to retrospective assessment of activities or quantitative assessment of activities. [HALF POINT]

Submission Evidence

- NPg has developed an alternative assessment of benefits called the SROI
- On page 10 the network company states: “we measure the benefits and our impact in a number of different ways”.

Site Visit Evidence

- The network company, however, reported during the site visit that they have “not adapted [their] approach to calculating SROI since last year” and have changed the way they apply it. The reason for this change seems to be informed by the fact that some smaller community/third sector organisations struggle to provide the information needed to carry out the SROI assessment. The company is now working to identify what is possible on a project by project basis to help them measure and report effectively.
- NPg has adopted a cost-benefit analysis to study the results of the Green Doctor’s engagement and has applied the SROI (calculated by the partner organisation) to a couple of their projects in this year submissions; given the lack of a system and overarching methodology to evaluate activities that are not restricted to a retrospective quantitative assessment, we have awarded a half point.

Network company has clear plans to address shortcomings and barriers to performance improvement it is currently facing. [HALF POINT]

Submission Evidence

- The network company has presented various challenging goals that we mention in this assessment under sub-criteria A; these include training 100% of staff including contractors in consumer vulnerability, a new CRM system allowing them to record more on the needs of each vulnerable customer, among other improvements.
- We regard these plans as clear, realistic, tangible and with a definite impact on the ability of the network company to support vulnerable customers.
- However, we believe there is still the problem of lack of coherent strategy around vulnerability with respect to the rest of the ‘pillars’ of social responsibility (see point in relation to sub-criteria A); for this reason, while the company is moving in the right direction we have not awarded full point on this measure.

UK POWER NETWORKS

INDEPENDENT ASSESSMENT OF NETWORK COMPANY'S PERFORMANCE AGAINST OFGEM'S CONSUMER VULNERABILITY CRITERIA

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. <input checked="" type="checkbox"/> 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 checked="" type="checkbox"/> Enough flexibility to adapt to differences in vulnerability and changing needs of vulnerable consumers. <input checked="" type="checkbox"/> 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. <input checked="" type="checkbox"/> Targets for improved performance and increased impact. 	<ul style="list-style-type: none"> <input checked="" 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

Legend

<input type="checkbox"/> 0 Points <input checked="" type="checkbox"/> 1 Points <input type="checkbox"/> ½ Points
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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. ✓ 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. <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"> <input type="checkbox"/> 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"> - 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.

Legend

<input type="checkbox"/> 0 Points ✓ 1 Points — ½ Points

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. - 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.

Legend

0 Points ✓ 1 Points — ½ Points

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"> <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"> ✓ 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. <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"> <input type="checkbox"/> 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.

Legend

<input type="checkbox"/> 0 Points ✓ 1 Points — ½ Points

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. - 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"> ✓ High level of integration of the network company's role into general systems and processes throughout the business. - 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. <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"> <input type="checkbox"/> 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.

Legend

<input type="checkbox"/> 0 Points	<input checked="" type="checkbox"/> 1 Points	<input type="checkbox"/> ½ Points
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Ofgem Reference Scoring Points

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

Final Assessment of UK Power Network's Performance

SECV Sub-Criteria	Score	Mark
A	9.1/10	Excellent
B	8.2/10	Good
C	9.4/10	Excellent
D	9.1/10	Excellent
E	9.2/10	Excellent

Assessment of Part 3 Submission - UKPN

Independent Review of DNO Consumer Vulnerability Performance

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 customers

Submission Evidence

- “UK Power Networks provides a vital service to almost a third of the UK population. The rich diversity of our customers, and the impact societal trends and personal circumstances have on each of them, requires us to engage effectively with a broad cross section of stakeholders in order to better understand and meet their varied needs.”
- Additionally, on page 3 the Network Company presents their approach to expanding and developing services for PSR customers. We believe that, in taking into account a wide range of trigger points (i.e. Data on PSR registration, external advice and customer feedback), the company can adapt quickly and effectively to the changing dynamics of consumer vulnerability.
- UK Power Networks does not look at consumer vulnerability through the lens of industry-wide needs codes but seems to focus on the needs of each customer. On page 4 they state: “We also recognise that not every vulnerability will be captured by a needs code. Our culture encourages employees to identify additional needs, such as autism.”

Site Visit Evidence

- Additionally, during the site visit the network company stated that; “The seventh [needs] code, ‘Medical Dependency Other’,... captures a broad pool of customer needs. It does include, for example, customer with medicine required to maintained refrigerated ... In order to better understand the needs of this group we undertook a series of one-to-one interviews with customers with a range of conditions dependent on electricity.” It is evident that UKPN has studied the implications of vulnerability to gain a flexible understanding of what vulnerability is and how it impacts different people through a structured approach.
- As part of our site visit discussions, UKPN stated that: “No two customers are the same and we are acutely aware that just because one of the customers is of a certain age, it does not automatically mean they are vulnerable.”

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.

Submission Evidence

- “Our first role is to keep the lights on for our customers, and two responsibilities stem directly from that: to help the public and our employees stay safe around our network, and to understand how vulnerability affects our customers and how that influences the service and support we provide to them.”
- “Part 3 of our submission sets out in detail how our strategy in this area is a key element of our social role, a role which we regard as a business imperative and a critical measure of our performance.”

- “We know that many customers are medically dependent on electricity and we have expanded our partnerships this year to help us increase registrations from customers who use dialyzers, nebulisers and ventilators.”

Site Visit Evidence

- During the site visit, the network company mentioned that performance against Social Role is a new business target (KPI) and was added following feedback from newly established CEO panel. The company still does not know how to measure this KPI but is working on options. Furthermore, UKPN’s 2015-2023 business plan includes 77 commitments that related directly to vulnerability.

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.

Submission Evidence

- UK Power Networks states that it is working towards being a dementia friendly business based on national data indicating the forecasted rise of a number of over 60s among their customers and based on an increased number of PSR signups on the Dementia vulnerability code.
- “We know that financially vulnerable consumers specifically those in fuel poverty – are more likely than a typical consumer to suffer substantial detriment.”
- “We conducted ten in-depth interviews with customers with a range of medical dependencies and surveyed over 1,000 customers after a fault to understand the experiences of these customers ... Dialysis users told us that the availability of clean water was a priority in an emergency. We shared this information with our cross utility partners and two water companies
- “We were pleased to continue to retain the Action on Hearing Loss accreditation: Louder than Words. Louder than Words™ is a nationally recognised accreditation for organisations striving to offer excellent levels of service and accessibility for customers and employees who are deaf or have a hearing loss.”

Targets for improved performance and impact

Submission Evidence

- “We have committed to becoming a dementia friendly business.”
- UK Power Networks is also exploring innovating methods to support vulnerable customers in case of emergencies “To improve how we help vulnerable customers in events such as Storm Doris, we are exploring the concept of an emergency button for vulnerable customers.”

Good understanding of the main ‘vulnerability issues’ facing its consumers

Submission Evidence

- On page 2, a quote from the BSI report states that: “Throughout the assessment, it was evident that the regional demographic variations had been identified and considered when managing the needs of vulnerable customers.”
- UK Power Networks states that they have “hugely from participating in ‘information sharing’ events run by Essex Fire & Rescue Service ... These exchanges enable us to increase the support we can offer customers by growing our knowledge of where we can signpost customers to access help relevant to their needs”. The network company states that a key outcome was an increased understanding of local vulnerability.

Site Visit Evidence

- During the site visit, the network company stated that they had identified three demographics where there are well above national average indicators of need. These are 'poverty', 'health and age' and 'faith and language'.

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

Submission Evidence

- "... we designed and delivered a pioneering new project, 'Faith and Power', in partnership with the London Sustainability Exchange (LSx). The project engaged hard-to-reach or seldom heard groups about preparing for, and getting help in power cuts and saving energy."
- "This work formed the basis of a 'communications toolkit' using messaging specifically designed for an Islamic audience."
- "The toolkit has been used ... to visit mosques and communities delivering advice on lowering energy bills, free services such as PSR, warm home discounts, grants and understanding the benefits of smart meters."

Site Visit Evidence

- During the site visit, UKPN provided evidence that they have engaged with 141 stakeholders as part of their Critical Friends Panels in each of their network areas; these range from businesses to charities to local authorities and represent a large group of stakeholders.
- Furthermore, the network company provided a detailed list of stakeholder organisations represented at the Critical Friends Panel. The list includes a broad range of stakeholders covering a wide range of organisations.

Stakeholder engagement programme is fully utilised in developing the network company's data acquisition strategy

Submission Evidence

- UKPN does not provide extensive detail in how it uses its stakeholder engagement strategy to acquire data. On page 4 it states: "We do not want to add to the anxiety of our vulnerable customers and therefore do not make cold calls. Instead, we maintain the accuracy of our PSR data through innovative awareness raising campaigns, working with partners and validating our PSR contact data to ensure it is up to date."

Site Visit Evidence

- During the site visit, the network company provided evidence that suggests both partnerships and customer engagements in any occasion are also used to acquire and update data on customers.
- The network company provided evidence that they have used their awareness campaigns to update customer records.

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 [HALF POINT]

Submission Evidence

- UK Power Network shows a focus to develop and implement appropriate mechanisms to engage with specific categories of vulnerable customers. An example of this behaviour is presented on page 7, where the Network Company states: “Taking the learnings from four focus groups with Bengali and Somali Muslim men and women, we designed and delivered the Faith and Power programme that engages the Muslim community on preparing for an emergency, getting practical help in a power cut and on energy efficiency.”
- Given the limited evidence on how the company has developed tailored mechanisms to meet the needs of other groups of hard-to-reach stakeholders, we have awarded half point on this measure.

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

Site Visit Evidence

- During the site visit, the network company explained that they check, through a specialised service, all PSR contact information on a yearly basis. This is an above average approach when compared to the industry standard.
- Data acquisition on customer needs happens through awareness campaigns and calls with customers (calls not made specifically to update data). During the site visit, the network company provided evidence of 5 different activities it is undertaking in this area to acquire customer data.

Data and information updating strategies working very well [HALF POINT]

Submission Evidence

- “1.7m contact details checked against our PSR in our annual data cleanse.”
- “127,627 records updated with new contact information.”

Site Visit Evidence

- The network company provided evidence during the site visit that they checked nearly 1m PSR accounts and a total of 1.7m contact details to make sure that these were up to date and accurate. This exercise led to the identification of some PSR entries that no longer had telephone records that were ‘active’. By purchasing both landline and mobile phone numbers of these contacts the network company makes sure that they have up-to-date contact details on a yearly basis.
- Customer data was also updated through customer awareness campaigns, as indicated during the site visit.

Scoring Notes

- However, there is no systematic approach to refreshing the company’s data on PSR customer need codes; this takes place whenever the company gets in touch with a customer for any reason. The company provided a reason for not performing cold calls to gather updates on the evolution of a customer’s vulnerability. For this reason, we have awarded half a point on this measure.

As ‘Good’ plus using data to assess future risk of vulnerability and shape partnerships with other relevant organisations. [HALF POINT]

Submission Evidence

- “Using our vulnerability map (that uses publicly available data to map socio-economic and demographic data), we identified Kirkley near Lowestoft as an area with high levels of deprivation. We held a joint event with Suffolk Fire and Rescue Service, National Grid Gas Distribution, Southern Gas Networks (SGN), Essex & Suffolk Water and Suffolk Warm Home Healthy People to promote the PSR, safety and energy efficiency.”

- “We identified medical conditions with a dependency on electricity ... moreover, built relationships with patient groups for these conditions.”
- Additionally, the Network Company takes into account data sources to prepare for future developments in the vulnerability of its customers. On page 7 they state: “Following a significant increase in the number of people on the PSR registering against the dementia needs code and our awareness that an ageing population is likely to have implications for the services we provide, we wanted to deepen our understanding of the needs of people living with dementia.”
- Half a point was awarded on this measure as we have found that the network company uses data to shape partnerships with relevant organisations.

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

Submission Evidence

- “Using our vulnerability map CES targeted the poorest areas in our South East region.”
- UK Power Networks directed its service and awareness building efforts towards areas characterised by concentration of particular types of vulnerabilities. An example is provided on page 5: “Using our vulnerability map (that uses publicly available data to map socio-economic and demographic data), we identified Kirkley near Lowestoft as an area with high levels of deprivation.”
- “Our vulnerability map is populated with a broad range of data that enables us to identify specific or combined deprivation, know where our PSR customers are and therefore geographically target our engagement and projects to those areas where they will have the greatest impact. We draw on a range of sources such as the English Indices of Deprivation 2015 and consider factors such as employment, health, age, access to services and dependent children.”

Site Visit Evidence

- During the site visit the network company gave a further example of how data informs its approach to response prioritisation: “We supplement data from our existing mapping (poverty, age, health) with the following data to support in prioritisation: (1) Number of customers off supply ... (x) IMD score.”

Awareness of data gaps and processes in place to address these

Submission Evidence

- “Our approach is not about volume alone. Using our own and publicly available data, we identified needs codes that were under-represented on the PSR and targeted our promotion at those groups.”

Some consistency between data sources

Submission Evidence

- We have found no evidence to indicate that UKPN has no data source consistency issues.

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

Site Visit Evidence

- During the site visit the network company provided evidence that they purchase records to cleanse and remove old data annually. We have awarded half a point on this measure since there is no evidence of a feedback loop that informs the development of their data acquisition and management strategy.

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

Submission Evidence

- “Using our own and publicly available data, we identified needs codes that were under-represented on the PSR and targeted our promotion at those groups.”
- “Following a significant increase in the number of people on the PSR registering against the dementia needs code and our awareness that an ageing population is likely to have implications for the services we provide, we wanted to deepen our understanding of the needs of people living with dementia.”

As ‘good’ plus approach reflects the 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.

Submission Evidence

- “...our customer management system gives us the flexibility to add temporary records for any customer who considers themselves to be”
- “...this year for the first time, our annual media campaign promoted the PSR specifically to new parents via an advertorial on Netmums to make parents of under-fives aware that they could register for priority help in a power cut.”
- “Our projects to identify new vulnerable customers combine a desire to understand more about the specific needs of defined groups of vulnerable customers with practical measures to increase penetration of the PSR among vulnerable groups, and the value to customers of these initiatives far outweighed the cost of delivering them in 2016/17.”

Site Visit Evidence

- During the site visit, the network company provided evidence of processes and systems to accommodate temporary vulnerability. These include fixed period registration, proactively seeking registration from a customer who has or will suffer from temporary vulnerability, proactive calls when the sign-up period is due to expire to give the option to update needs or come off the register.

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.

Submission Evidence

- On page 8, UK Power Network presents the wide range of services it offers to customers on the PSR. The Network Company segments its services in four key areas ranging from contact channels to on-site support and tailored services. We believe this be a full range of additional services.
- “If a service is not relevant or suitable to a customer’s particular need we do not offer it.”

Site Visit Evidence

- During the site visit, UKPN provided more detail on the four-step process it takes to expand and develop services for PSR customers. The process starts from partner insight and challenge on a specific issue, it then progresses to a research phase, informed (it seems) by partner expertise. The potential solution is then tested with a subset of customers to test its use; if successful the solution is fully deployed. In the specific example provided by the network company, it is apparent

how the service was successfully tailored to the needs of deaf customers or those affected by the loss of hearing.

- During the site visit, the network company highlighted that: “Customers do not need to be on the PSR register to receive help and support in the event of a power cut. All reactive services are available to our customers if required.”

Detailed analysis of need undertaken which demonstrates how these services reflect the complex and multidimensional nature of vulnerability. [HALF POINT]

Submission Evidence

- We note that, throughout their Part 3 SECV submission, the Network Company adopts a clear structure following which UK Power Networks presents a new or expanding service and lists the outcomes provided by this service. Outcomes are detailed and relevant, three examples of this can be found on page 6 where the company presents detailed outcomes of their Fuel Poverty services, specifically, ‘You and Your Home’, ‘Community Energy South’ and ‘London Sustainability Exchange (LSx)’. We believe in providing such granularity in measuring the outcomes, UK Power Networks shows awareness and justifies the added value of services.

Site Visit Evidence

- During the site visit, the network company stated that: “... rather than predetermine what projects we believe will effectively serve customers we use our stakeholders to increase our awareness of the needs of vulnerable customers. Through focus groups and collaborative working with arrange of partners and stakeholders, we can co-design, and co-deliver services that stakeholder believes will effectively serve vulnerable customers”. While this points to a need analysis carried out by UKPN, there is no detailed evidence to suggest how this takes place in practice.
- Furthermore, during the site visit the company stated that: “Once the need has been understood by our advisors only then will they offer appropriate support that is inclusive of the customer input, working with the customer to ensure that heir unique needs are addressed.” This seems to indicate that the network company carries out a needs analysis on the spot. Given the lack of evidence of a structured needs analysis, we have awarded half a point on this measure.

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

Submission Evidence

- “...we have extended the channels which we use to promote the PSR in order to target new parents and GPs.”
- We observe that targeted advertisement of the PSR has led to meaningful results in reaching particular groups of vulnerable customers. Some examples are provided on the bottom of page 4 (i.e. “125% increase in PSR registrations from those with a ventilator”)
- “Our approach is not about volume alone. Using our own and publicly available data, we identified needs codes that were under-represented on the PSR and targeted our promotion at those groups.”
- UK Power Networks proposes some examples of its targeted multichannel PSR campaign. Actions included:
 - Targeted social media advertising on sites for parents, disabled people and carers,
 - Events in London shopping centres in areas with high levels of deprivation
 - PSR information of pharmacy bags targeting areas of financial deprivation, large numbers of over 60s and characterised by poor health.

- Building relationships with some partners best placed to address vulnerability needs of specific groups of customers identified through data analysis (e.g. “We identified medical conditions with a dependency on electricity ... and built relationships with patient groups for these conditions.”)

Site Visit Evidence

- When asked about targeting activities during the site visit the network company stated that: “We appreciate the importance of targeting our resources to ensure the best possible outcome. All our projects are designed to have maximum impact, in the parts of our networks that need them. To do this, we utilise qualitative and quantitative data to guide us.
- Furthermore, during the site visit the network company provided evidence that they strongly relied upon their vulnerability mapping exercise to drive campaigns. This included community outreach on pharmacy bags. Other important examples include the shopping centre promotion campaign which was based on a two-stage process to select six target areas: “To do this we used our mapping tools, analysed a number of data points including the Index of Multiple Deprivation, levels of fuel poverty and the age and health demographics of the area.” The second phase made sure to use demographics of shopping centre users to place UKPN presence at the right spot and with adequate translation provision. We believe this is an example of the solid use of data to inform PSR recruitment.

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

As good, plus fully utilising existing partnerships

Submission Evidence

- “Partners enable us to identify gaps in our understanding, build our knowledge and shape the services that we deliver to vulnerable customers today and in response to societal trends. The majority of our partnerships span our vulnerability strategy, supporting our work on PSR, fuel poverty and hard-to-reach or seldom heard communities.”
- We understand that UK Power Networks pick their partners to achieve specific, well-defined aims. On page 4, for example, the network company states: “We work with LSx to understand how we can improve our communications with the Muslim Community on a range of issues including the PSR and fuel poverty and are working with CES to provide face-to-face advice on energy efficiency and the PSR.”
- “When selecting new partnerships, we consider how the partner supports our vulnerability strategy. For example, our partnership with the British Kidney Patient Association enables us to increase awareness of the PSR among a specific customer segment who would be critically affected by a power cut and helps us improve our understanding of vulnerability.”
- “... we have sought partnerships with organisations whose client groups are covered by one or more of the existing PSR codes, and now have a partnership in place for each PSR code.”

Site Visit Evidence

- During the site visit, the company stated that: “Key to choosing partners is to consider its potential expertise, reach and service...to adequately review if potential partnerships can deliver on these criteria we have implemented a partnership selection score card.” We believe this constitutes a clear strategy towards developing and utilising partnerships.

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

Submission Evidence

- UK Power Networks presents on page 9 of their SECV Part 3 submission a wide range of partners including organisations of very different types (i.e. SNG or National Grid vs. The British Red Cross or Parish Councils)

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

[HALF POINT]

Site Visit Evidence

- Following a request for evidence during the site visit, UKPN made available a spreadsheet on which they had mapped needs codes to partners. From this piece of evidence, we observe that the network company's partnerships provide full and effective support for all groups of vulnerable customers.
- Overall, we believe that some of these partners are fulfilling more of a stakeholder role by providing feedback/input to initiatives rather than partner project/service delivery. Given the lack of evidence fully supporting the fact that UKPN partners provide full and effective support, we have awarded half a point on this measure.

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

Submission Evidence

- UK Power Networks identifies "a clear rationale for selecting a new partner and select those that will deliver most impact." The network company proceeds by showing a process followed to select some of the new partnerships initiated in 2016/2017. This approach shows a clear rationale for selection and defined the action to be taken by a partner.
- An example of how evidence from existing partnerships has shaped the strategy of UKPN was offered during the site visit. The network company was able to adjust its existing arrangements with Citizen's advice and develop new ones (i.e. community engagement referrals at shopping centres) based on the underperformance of a referral process formerly in place with the same organisation.

Site Visit Evidence

- During the site visit, UKPN discussed how sharing PSR and You & Your Home information with community agencies had informed their current strategy: "Two key things we learned through the partnerships and the associated information sharing are: (1) the importance of working with trusted partners ... (2) Representatives at these events give you an insight into the needs of the community ... (3) impact of isolation or loneliness."

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

Submission Evidence

- The approach taken by UK Power Networks to identify the right partners to achieve very specific aims and deliver a specific type of service that fits the needs of different vulnerabilities leads us to the conclusion that the company is doing what it takes to deliver solutions without creating unnecessary work.

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.

Submission Evidence

- Stemming from the stakeholder feedback that UK Power Networks should not be contacting customers via cold calling, the Network Company ran a multi-channel campaign to increase awareness of the PSR.
- “We prioritise our on-site support for planned and unplanned power cuts based on some factors including transport links and whether the area is served by the gas grid.”
- “We target our vulnerability work to areas of particular need and prioritise our on-site support during outages and community outreach events to these areas.”

Site Visit Evidence

- During the site visit, the company stated that: “...this year we saw a significant unpredicted increase in contact regarding customers living with dementia. This intelligence, and intelligence like it, is helping us shape our training strategy, our partnerships, the services we offer and the future of our business.”

Full senior management buy-in to the network company’s strategy in this area. [HALF POINT]

Submission Evidence

- Executive boards members have taken dementia vulnerability training before the rest of the enterprise: “all our customer service leaders and the Executive Management Team have completed a dementia awareness programme which will roll out across the company in 2017/18.”

Site Visit Evidence

- We understand from the site visit that the CEO Panel on consumer vulnerability, which is planned to meet once a year, has not yet taken place. While the direction is promising, for this reason, we have awarded half a point on this measure.

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

Submission Evidence

- As discussed in Sub-criteria C, the network company has shown that it justifies why its chosen actions address social issues by relying on stakeholders and some quantitative or qualitative analysis (such as the Willingness to Pay exercise). UKPN however, fails to present a convincing explanation of how feedback from stakeholders and/or WTP research justifies the actions they have undertaken or why these were more effective over alternatives. For example, the cost/benefit of its fuel poverty relief scheme is based upon broad objectives applicable across electricity and gas distribution, and tested WTP for fuel poverty relief schemes against an average joint annual household energy bill of £1,226.02, whereas the DNO element of the bill would be in the region of £76.

Site Visit Evidence

- During the site visit, the network company stated that market research they carried out on the ‘You and Your Home’ initiative pointed to the fact that most customers found this activity helpful. The network company does not provide further detail on the value added of the initiative.
- Finally, the network company states that they base their understanding of a link between fuel poverty and consumer vulnerability on research from the NEA which states: “78% of households

in fuel poverty are classed as vulnerable, that is one containing children, the elderly, or someone living with a long-term illness or disability.”; other similar research from the Royal College of Pediatrics and Child Health is quoted on the same topic. This does not justify fully why fuel poverty is related to or impacts directly the wellbeing of vulnerable customers that can be exacerbated during a power-cut.

As ‘good’ with the 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.

Submission Evidence

- UK Power Networks piloted an app in 2015/16 to “help our field staff communicate with customers who do not have English as a first language is now business as usual, and has been rolled out to all our operational employees”. Expanding on its success and responding to customer feedback, the Network Company “added Arabic and Punjabi to the app ... the addition of Browsealoud to our website, which includes language translation, has further improved our ability to communicate with our customers who do not have English as a first language.

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

Submission Evidence

- “Last year we piloted sensory training to help staff empathise with customers with a range of impairments. Co-designed with Age UK, the training is now business as usual for our customer service teams and available to all employees.”
- UKPN is also working on very innovative approaches to expand on the awareness training started in the past. On page 2 they provide the following example: “Working with the National Autistic Society, we co-designed pioneering virtual reality training that gives employees an insight into autism. Currently developed to train our trainers, if successful, the course will become part of our customer service training.”

Site Visit Evidence

- During the site visit, the network company provided evidence to suggest that they offer specialised vulnerability training to enable staff to respond to conditions such as Dementia, loss of sight and poor mobility.

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.

Submission Evidence

- “Our employees are trained and empowered to respond to customer vulnerability.” UKPN proceeds to support this claim by providing a real life example showing that staff had the flexibility available to ‘do the right thing’: “When one of our customers, who relied on a stair lift to get to her bathroom, was going to be affected by a planned outage we offered her a hotel room. However, the customer was reluctant to leave her home. Using their discretion, the customer services advisor arranged to provide a portable toilet and so enabled her to stay in her home during a power cut.”

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

Submission Evidence

- UK Power Networks carried out a Willingness to Pay exercise to identify and measure the value that its services and actions were having on vulnerable customers: “The study established our customers’ willingness to pay for certain projects and initiatives. We then compared the cost of the projects and initiatives we delivered in 2016/17 to deliver specific outcomes with how much customers said they would be willing to pay for those outcomes (Value to customers). The difference between the cost and the willingness to pay enables us to establish the cost benefit to our customers. The highest willingness to pay was reserved for service initiatives to help vulnerable customers and those affected by fuel poverty.”
- The company also carried out further studies to understand if results would change once specific projects were discussed around a table with stakeholders rather than by phone.

Very clear feedback loop between the monitoring and evaluation of services by the consumer-facing teams to the overall strategy about social issues relevant to vulnerable consumers. [HALF POINT]

Submission Evidence

- “Following a discussion at our partner forum about website accessibility, we ran a focus group with disability organisations to understand how we could improve the accessibility of our website. We identified access for partially sighted customers as a priority and worked with Browsealoud to add software that speaks written text.”
- In reviewing UK Power Network’s Part 3 submission, it becomes apparent that the network company seeks and acts upon feedback that it receives to stakeholders to improve its impact on the lives of vulnerable customers. Various examples can be found within the submission, indicated by an icon for ‘Output’ and the subsequent learning or action that stemmed from this feedback.

Site Visit Evidence

- During the site visit, the network company indicated that ongoing engagement with stakeholders and customers was key to ensure that the contents of the revised emergency pack sent to vulnerable customers were appropriate and that it effectively served them. We were given a practical demonstration of how this pack evolved through the years and the feedback that led to its current form. The research was carried out to understand customer views to the box. However, it was noticed that, despite the involvement of stakeholders and partners in developing the welfare pack, the glow stick bore insufficient explanatory notes for users.
- During the site visit, UKPN stated that: “Engagement with stakeholders has resulted in 158 actions taken in response to stakeholder feedback... these actions resulted in 187 positive outcomes for customers of which 97 were outcomes for vulnerable customers.
- Also during the site visit the network company stated that: “Our staff are also engaging with older customers on a daily basis, whether this be when attending Age UK community events, or in the event of a power cut via our Service Delivery Centre or directly with our engineers in the field ... this intelligence ... Is helping us shape our training strategy, our partnerships the services we offer and the future of our business”. While this statement does not explain how the feedback loop takes place or if this is systematic in its use, it does highlight the existence of how customer feedback is considered in the overall vulnerability strategy of UKPN.

Scoring Notes

- The evidence provided by UKPN on their Part 3 SECV Submission as well as during the site visit surely points to the existence of a feedback loop from consumer-facing teams to the overall strategy of the company. However, due to lack of clarity on the nature of this feedback we have awarded half a point for this measure.

Network company has clear plans to address shortcomings and/or barriers to performance improvement it is currently facing. [HALF POINT]

Submission Evidence

- As a result of the evidence analysed we are confident that the network company has plans to address its existing shortcomings (implying an understanding of these) and improve the impact that it has on vulnerable customers.
- However, given the lack of detail surrounding the precise plans with which the company aims to address these shortcomings we have

ELECTRICITY NORTH WEST LIMITED

INDEPENDENT ASSESSMENT OF NETWORK COMPANY'S PERFORMANCE AGAINST OFGEM'S CONSUMER VULNERABILITY CRITERIA

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"> <input type="checkbox"/> Enough flexibility to adapt to differences in vulnerability and changing needs of vulnerable consumers. <input type="checkbox"/> 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. <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. ✓ 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

Legend

<input type="checkbox"/> 0 Points ✓ 1 Points — ½ Points

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 checked="" type="checkbox"/> Data and information management strategy an integral part of the network company's wider data and information strategies. - Evidence of good progress in keeping records up to date. <input checked="" type="checkbox"/> Awareness of data gaps and processes in place to address these. <input checked="" type="checkbox"/> Some consistency between data sources. 	<ul style="list-style-type: none"> <input checked="" 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. <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"> <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 checked="" 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.

Legend

<input type="checkbox"/> 0 Points <input checked="" type="checkbox"/> 1 Points <input type="checkbox"/> ½ Points
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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. ✓ 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. <input type="checkbox"/> Targeted advertising of the PSR and the services offered to vulnerable consumer groups. 	<ul style="list-style-type: none"> <input type="checkbox"/> 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. ✓ 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.

Legend

0 Points ✓ 1 Points — ½ Points

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. <input type="checkbox"/> 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. ✓ 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. <input type="checkbox"/> Partnerships provide some support to most groups of vulnerable consumers. 	<ul style="list-style-type: none"> <input type="checkbox"/> 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"> ✓ 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"> <input type="checkbox"/> 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.

Legend

<input type="checkbox"/> 0 Points ✓ 1 Points — ½ Points

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. <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. ✓ 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"> <input type="checkbox"/> 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.

Legend

<input type="checkbox"/> 0 Points	✓ 1 Points	— ½ Points
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Ofgem Reference Scoring Points

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

Final Assessment of Electricity NorthWest Limited's Performance

SECV Sub-Criteria	Score	Mark
A	7.7/10	Good
B	7.4/10	Good
C	8.1/10	Good
D	5.9/10	Weak
E	8.2/10	Good

Assessment of Part 3 Submission - ENWL

Independent Review of DNO Consumer Vulnerability Performance

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

Good understanding of the main ‘vulnerability issues’ facing its consumers

Submission Evidence

- “Last year, our data analysis demonstrated that we served 42,509 customers with hearing or speech difficulties and 29,798 blind customers so this became a focus.”
- “Our research into customer vulnerability types showed that is our partially sighted, hearing impaired and stair lift customers who are the most concerned if a power outage lasts longer than six hours, particularly through the winter months.” At the site visit, the network company explained that this insight comes from general customer service research commissioned to a third party by ENWL.
- “Our customer data tells us that in respect of the national average, hearing, speech difficulties and deafness are the top five most common disabilities of our Priority Service Register customer base.”
- On page 8 the company shows a pie chart tracking the number of customers registered under a wide range of needs codes.

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

Submission Evidence

- “There is ‘no one size fits all’, and we use engagement to define and tailor our approaches.”
- The pie chart shown on page 8 under the ‘Vulnerability consumer data as of 31st March 2017’ shows a wide range of needs codes that show ENWL has an appreciation of the different types of vulnerabilities. The company seems to take into consideration at least some of the differences by addressing needs in different ways as shown in the table on page 7.

Site Visit Evidence

- During the site visit, the company stated that they had identified small and medium enterprises such as: “... hairdressers, cafes and food outlets like chip shops who are affected by their business and reputation being affected”. This was based on some stakeholders taking part to the Reliability Advisory Panel.

Recognition of social role confined to generalised statements

Submission Evidence

- While the network company mentions that they have developed a good understanding of their social role, there is no evidence or explanation of what this social role is and how it impacts their business. The examples provided do not go into detail and are confined to generalised statements: “These inputs have been invaluable as we have developed our understanding of social issues relevant to the energy sector and those issues external to the sector which could affect vulnerability. Working with the Citizen’s Advice to develop our understanding of the personal impact a school power cut can have on communities and families is one example of this.”

Targets for improved performance and increased impact

Submission Evidence

- “We are considering carrying out annual customer surveys in collaboration with our Advisory Panels, to better understand priority areas for our Priority Service Register customers, and what we could do to improve them.”
- “... we plan to introduce ‘Chabot’ later in the year to enable customers to use Facebook to share their concerns and enquiries with us.”

Site Visit Evidence

- As part of the site visit, we asked ENWL to provide evidence that they had been setting challenging targets, as stated during the site visit. The company stated that: “We put challenging targets in place to support our strategy for Vulnerable Customers as part of our Well Justified Business Plan. These targets have been in place since 2015, and we discuss progress against the targets with our Vulnerable Customer Advisory Panel”.
- A list of actual targets includes generic targets for improved performance except some targets such as: “Contact of Low Voltage Faults customers within the first 3 hours, all High Vulnerability within 2 hours”.
- On the site visit, ENWL explained it wants to develop its initial projects (one with Energy Saving Trust and the other Power Saver Challenge): “we are looking at what role can a DNO play in alleviating fuel poverty both tactically and strategically”. It is looking at how a DNO-led targeted customer energy efficiency programme could free up capacity on the electricity network and reduce the bills of network customers, helping the most vulnerable customers out of fuel poverty and warm cold homes.

Good awareness of the social issues associated with the industry that are most prevalent across its vulnerable cons. base. [HALF POINT]

Submission Evidence

- “When undertaking pro-active calling with Priority Service Register customers, we identified that advisors were increasingly dealing with many sensitive issues including bereavement.”
- While the network company makes general references to social issues in its Part 3 SECV submission and mentions that it tracks and acts to alleviate these issues there is no specific evidence of which area it is targeting and little evidence of which issues affect consumer vulnerability in general. For instance, there is no reference to fuel poverty issues.

Site Visit Evidence

- When prompted to provide an overview of issues both internal and external to the energy industry the network company provided evidence that “[their] affordability advisory panel is concerned to better understand the incidence and impact of fuel poverty in the North West...”
- Other examples provided during the site visit include the impact of school closures on low-income families and the impact of business closures on small businesses (both of these were not mentioned in the submission) as well as flood resilience (not a social issue per se but it can exacerbate the vulnerability of customers).

Scoring Notes

- Overall, we believe that the network company understands the range of social issues that is associated with the industry in general and that the evidence it has provided points to a limited understanding of how these manifest in their network area; for this reason, we have awarded half a point on this measure.

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

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

Submission Evidence

- “Analysing our CRM data we identified that we had 65,858 customers who have no contact details other than their address, and 98,560 with email addresses.”
- “Comparing the data we hold to national and regional statistics helps identify groups which may be under, over or unrepresented in our Priority Service Register.”
- On page 7 the network company shows that it tracks how many vulnerable customers it serves in each vulnerability category as well as a target number to reach in each category (calculated as number of consumers registered in a specific needs code-target number based on National Statistics)

Site Visit Evidence

- Furthermore, during the site visit the company stated that: “We compare the data we hold with the data which captures the national occurrence of a particular need. This allows us to identify which groups are under-, over- or not represented in our data”. This statement points to awareness of data gaps.

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

Submission Evidence

- “... this interaction [notice for planned interruption] provides the opportunity to check and update customer information on the system and ensure that we are meeting our obligations in tackling the specific issues that are relevant to our vulnerable customers.”

Site Visit Evidence

- During the site visit, the network company provided evidence that suggests they use partnerships to acquire data: “Where we identify comparative under-representation or no representation we seek partners who can support us in addressing the gap.” Two specific examples were provided.

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

Submission Evidence

- “Our data-led approach to partnerships has allowed us to create comprehensive targets and a plan of action on which groups to target for inclusion on our PSR.”

Site Visit Evidence

- During the site visit, the network company explained how the newly developed CRM system could help service delivery and activity planning by factoring in consumer vulnerability. There is no evidence provided of this process being employed.

Scoring Notes

- Given the lack of detailed evidence around how data improves service development and delivery we have awarded a half point

Some consistency between data sources

Submission Evidence

- We have found no evidence to suggest that the network company does not have issues relating to data source consistent both in the submission or during the site visit.

As ‘Weak’, plus basic systems in place to keep track of data use and some feedback to data acquisition and management strategies

Submission Evidence

- There is little-to-no evidence on systems to keep track of data use that feedback to acquisition and management of data.

Site Visit Evidence

- During the site visit, the network company stated that a quality regime introduced within the contact centre “...confirms that all processes within the CRM system are completed to ensure that customer details are updated with their communication preferences and the log of their call”. This can be seen as a process to track data quality and is related to management strategies.

Evidence of good progress in keeping records up to date [HALF POINT]

Site Visit Evidence

- When asked to support the claim that the company had made good progress in closing data gaps, ENWL stated that “We made over 179k proactive contacts to keep our data up to date and we agreed on SMART objectives ... which target further significant improvement in this area.”
- We have awarded half point because while the network company explains their actions and focus on this area, they have not provided evidence to support the claim that ‘good progress had been made.’

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

Site Visit Evidence

- During the site visit, the network company explained that vulnerable customer data is managed through the wider CRM system used by ENWL to carry out its customer service activities.
- The network company states: “There is a process in CRM which promote our call centre agents to check customer details every time they speak to a PSR customer.”

Sub Criteria C – Approach taken to management and use of PSR and associated services

A wide range of additional services offered that clearly reflect the specific needs of the “core” eligible groups of consumers. [HALF POINT]

Submission Evidence

- While the company states that: “Our goal is to ensure that our services are available and made accessible to all customers equally, regardless of their circumstances, and to embed these values throughout all aspects of our business.” it emerges from the table at the bottom of page 7 that some of these services are only offered to some specific groups of customers.
- Additional services build on top of the standard offering mentioned on page 9 of the submission.
- We have awarded half a point since there is no evidence that ENWL measures whether these services reflect the specific needs of the core eligible groups they address.

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

Submission Evidence

- ENWL has adopted a service to improve the way it deals with customers who are unable to communicate in English by partnering by using mobile apps to translate on the doorstep.

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 POINT]

Submission Evidence

- “We do not limit registration to types of vulnerability identified through the regulatory requirements and encourage anyone who needs this extra level of protection to register.”
- While the network company states that their newly introduced CRM system enables them to record transient vulnerability and provides processes to update and remove customers once their vulnerability period has elapsed, there is no evidence that ENWL uses data analysis to identify vulnerable customers outside of core groups.

Site Visit Evidence

- During the site visit the company stated that comparisons between the data they hold with national data held on areas of vulnerability has been powerful in shaping our understanding of vulnerability outside of the ‘core groups’. Giving the limited evidence presented on this measure we have awarded half a point.

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.

Submission Evidence

- As mentioned in Sub criteria D3, the outreach that ENWL performs to advertise its PSR and its associated services is very much focused towards signposting and distribution of marketing material by a wide range of partners.
- There is no evidence that the network company drives outreach efforts by applying analytical processes to data to identify targets for their outreach.

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

Submission Evidence

- While the network company states “Our data-led approach to partnerships has allowed us to create comprehensive targets and a plan of action on which groups to target for inclusion on our PSR. This ensures that our partnerships produce tangible outputs and positive outcomes for our customers in the North West.” there is little to no justification of how the services offered add value to each group of vulnerable customer.

Site Visit Evidence

- During the site visit, the network company stated that to ensure added value of the services they offer to customers ENWL is “working with [their] Vulnerable Customer Advisory Panel and ... undertaking research with [their] PSR customers”. They give the specific example of changes made to their communication channels and provide evidence of how exchanging ideas with the panel led to an improved approach to promoting the ‘105’ number.

Scoring Notes

- While we are convinced that the company is aware that these services add value to customers, we do not believe there is evidence to suggest that this value is fully justified.

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 customers, and identification of delivery solutions [HALF POINT]

Submission Evidence

- While ENWL has partnered with a wide range of companies, also outside the utility sector, we understand that these are mainly oriented towards referrals of vulnerable customers to the network company as well as PSR promotion efforts.

Site Visit Evidence

- During the site visit, the network company explained that a key aspect of their partnership strategy is based on their existing data. They identify gaps in PSR take-up against what should be expected and then develop partnerships to increase data coverage.

Scoring Notes

- We have to note that the partnership strategy seems to be geared almost entirely towards the identification of vulnerable customers and PSR promotion/signposting not the delivery of solutions for these customers; for this reason, we have awarded half a point on this measure.

Partnerships largely restricted to referral and signposting.

Submission Evidence

- On the Lancashire Fire and Rescue: “We put an agreement in place to pilot a referral service of customers who contacted our Customer Contact Centre Welfare Team. Our staff now advise customers of the programme, ask if they wish to opt in and then send the details to Lancashire Fire and Rescue who would then add them to the list”. Additionally, the network company states “Further meetings are planned to discuss rolling the programme out across all of the Lancashire areas and to develop this approach with other Rescue Services.”
- Several other partnerships mentioned in ENWL’s Part 3 submission are strongly oriented towards PSR collaboration and referrals. Other examples include:
 - United Utilities – “We have agreed to signpost customers coming onto our website to United Utilities Priority Service Register to support their engagement programme and have a link and commentary on our website.
 - Stroke Association – “When directly contacting Stroke affected customers, the Carer Network has agreed to raise the profile of the Priority Service Register during their on-site visits.” and “We have provided the Stroke Association with 2000 Priority Service Register leaflets and will continue to support its customers during visits.”
 - Bury Hospice – “[an ENWL representative] left me with some information leaflets and forms which we can hand out to our patients who were not aware of the Priority Services Register and the help the Electricity North West could offer them.”

Partnerships provided limited support for the “core” groups of vulnerable consumers.

Submission Evidence

- Stemming from the fact that the great majority of partnerships are focused around PSR referral/signposting and some data sharing, ENWL has not relied on partners to deliver services to their vulnerable customers.

- While the company has engaged with some partners to improve some aspects of its approach to consumer vulnerability (such as the RNIB partnership to develop a website and introduce sign language for web videos), these were not involved in helping to tailor and deliver actual services to customers.

Wide range of partnerships extending beyond the utility sector

Submission Evidence

- ENWL has a range of partnerships that extend beyond the utility sector. This can be witnessed on page 7 where the network company presents various partners ranging from the Stroke Association to Air Liquide and education partners.

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.

Submission Evidence

- “We’ve also undertaken a customer survey with our vulnerable customers to get feedback on what is important with them ... following agreement and discussion of costs versus benefit with this, several changes to our communication channels were implemented. One of these has been the introduction of a new greeting system for PSR customers...”
- “... when 63% of our vulnerable customers told us that we should be proactive in communicating information in the event of bad weather, and 89% agreed we should provide advanced notice of imminent storms, we implemented this into our standard business operations.”
- “Our customer data tells us that in respect of the national average, hearing, speech difficulties and deafness are the top five most common disabilities of our Priority Service Register customer base.”

Site Visit Evidence

- During the site visit the network company mentioned how based on feedback from pensionable age customers, the company adapted its generator deployment policy.

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 to support customers. [HALF POINT]

Submission Evidence

- “... all new staff now get vulnerability training as a standard element of their training. We have also embedded a process of training all of contact centre staff, plus our HR and recruitment teams, to ensure that they are briefed to take overflow calls, if necessary.”
- “With one in four people being affected by mental health issues, last year we worked with Mind and Alzheimer’s UK to educate our call centre team;”
- “...our staff have ongoing training with Samaritan’s to help them to pick up on tones in a customer’s voice that would lead them to enquire whether they want to receive any additional support from charities such as the Red Cross.”
- With regards to the training programme offered to all call centre staff, the network company states that: “Our Training Programme includes updates to all Contact Centre staff on the industry changes and what that means for us as a business and for our customers.” (pg. 6)

- “We ensure all customer facing staff receive direct training on consumer vulnerability to the highest standards possible using a variety of learning styles... Training is centred on the role of a front-line Customer Service Advisor and includes a robust new starter programme. Phase 2 training is delivered in alignment with the overall training programme with support from the subject experts across the business.” (pg. 10)

Site Visit Evidence

- At the site visit, ENW stated that: “The customer facing teams have two types of training and our operational staff also receive our operational standard.” Given the lack of detail on the content and impact of the operational standard training for operational staff, we have awarded half a point on this measure.

Full senior management buy-in to the network company’s strategy in this area. [HALF POINT]

Submission Evidence

- “Our stakeholder engagement programme is driven by our board, led by our CEO, owned by our senior management and delivered by all colleagues across the business.”
- “New staff members are not only made aware of the service but are also encouraged to add details of appropriate family members, friends and neighbours to the scheme. Our Director of Strategy even made a video showing colleagues how to sign-up!”

Site Visit Evidence

- During the site visit, the network company provided a list of all senior managers who are leading on engagement. Out of the full list, which covers panels on a variety of issues including vulnerable customers, there are only two members who are part of the Vulnerable Customer Stakeholder Advisory Panel.
- Furthermore, the network company stated that: “Our executive team receives a monthly update on key engagement metrics and promotion of the PSR”, “Our board receives four updates a year outlining our stakeholder’s and vulnerable customer issues, concern and priorities.” but also states that “We will build a feedback loop from Board discussions directly to our Advisory Panel”.

Scoring Notes

- Given the lack of evidence to support full senior management buy-in, we have awarded half a point on this measure.

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

Submission Evidence

- While the network company shows that they have plans to improve impact on vulnerable customers (pg. 6: “We committed to change our internal systems to ensure we can provide and receive industry data to refresh customer data.”) there is no indication of a clear approach or plan to addressing shortcomings.

Site Visit Evidence

- As a result of the evidence submitted during the site visit, we conclude that there is no clarity around plans to address shortcomings and barriers to performance.

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.

Submission Evidence

- “Through our Leading Lights scheme we recognise and reward colleagues for going the extra mile to support our customers.”

Site Visit Evidence

- During the site visit ENWL provided evidence, in the form of a video recorded by a contact centre agent, explaining how staff went above and beyond to help an elderly man with health problems when he had been left with no supply to his property.
- Several other examples were provided by the network company in reference to the Leading Lights scheme which was designed to “recognise and reward colleagues for going the extra mile to support [ENWL’s] customers”

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.

Submission Evidence

- Throughout its Part 3 submission, the network companies mention that they act on the feedback received from customers as well as areas of improvement hinted by the data they hold on their customers (aided by a newly established CRM system). However, we have found no extensive justification of why ENWL’s actions address social issues and add value to customers.

Site Visit Evidence

- At the site visit the network company mentioned how their updated generator policy was developed based on customer surveys that: “told [ENWL] that the main concern for this group [pensionable age] in a power outage is a loss of supply and potentially losing the contents of their freezer.” This is a justification for a service, however by itself it is too limited to award a higher grade on this measure.
- During the site visit, the network company provided evidence of a cost/benefit discussion with their Panel to inform changes to communication channels. As we mentioned in Sub Criteria C, we do not believe the company provides enough evidence to suggest that a structured approach was employed to ensure that relevant social issues were being addressed other than through discussions with stakeholders.

Scoring Notes

- ENWL was the only company to articulate clearly the synergy between energy efficiency/saving measures which benefit consumers (especially vulnerable ones and those in fuel poverty) which also assist DNOs in freeing up capacity and promoting low carbon technologies. We feel it is important to reward the network company for being outstanding at justifying its work on fuel poverty.

Feeds into wider service design and other general systems and processes throughout the business

Submission Evidence

- The network company states that: “The integration of our CRM into our investment and maintenance processes provides these engineers with the information they need to appropriately plan for, manage and mitigate the impact of an interruption on vulnerable customers.”
- While we believe that this indicates ENWL takes into consideration its impact and the role that it plays in society, there is a lack of detail around how this process has delivered results for vulnerable customers.
- Furthermore, we believe that the criteria applied (as shown in the table on the bottom of page 9) fails to take into consideration the individual needs of vulnerable customers and may result in an approach that is sub-par as compared to the industry average. While the company stated in the site visit that it aims to address individual cases, the approach shown on the bottom of page 9 contrasts with this statement.

Site Visit Evidence

- During the site visit the network company that: “The Vulnerable Customer Advisory Panel identified the need to develop a website which is designed in a way which supports effective use by blind and partially-sighted customers.”

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

Site Visit Evidence

- From the targets for improved performance that the network company provided as part of the site visit, we can observe that there is a general understanding of where the company could improve its performance.

SCOTTISH AND SOUTHERN ELECTRICITY NETWORKS

INDEPENDENT ASSESSMENT OF NETWORK COMPANY'S PERFORMANCE AGAINST OFGEM'S CONSUMER VULNERABILITY CRITERIA

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 <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"> <input type="checkbox"/> Fully integrated understanding of social role with clear plans for developing systems and consumer-facing services to reflect role. ✓ 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

Legend

<input type="checkbox"/> 0 Points ✓ 1 Points — ½ Points

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. ✓ Evidence of good progress in keeping records up to date. - Awareness of data gaps and processes in place to address these. ✓ 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. <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. <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"> <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"> - 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"> <input type="checkbox"/> 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"> - 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.

Legend

<input type="checkbox"/> 0 Points ✓ 1 Points — ½ Points

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. - 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.

Legend

0 Points ✓ 1 Points — ½ Points

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. <input type="checkbox"/> 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"> ✓ 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"> <input type="checkbox"/> 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.

Legend

<input type="checkbox"/> 0 Points ✓ 1 Points — ½ Points

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"> - As 'fair', plus services routinely monitored and evaluated to test extent to which they are meeting consumer needs. ✓ 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. - 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"> <input type="checkbox"/> 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.

Legend

0 Points ✓ 1 Points — ½ Points

Ofgem Reference Scoring Points

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

Final Assessment of Scottish and Southern Electricity Network's Performance

SECV Sub-Criteria	Score	Mark
A	9/10	Excellent
B	7.4/10	Good
C	8.4/10	Good
D	7.3/10	Good
E	8.9/10	Good

Assessment of Part 3 Submission - SSEN

Independent Review of DNO Consumer Vulnerability Performance

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

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]

Submission Evidence

- Throughout its submission, the network company highlights a clear understanding that its actions affect vulnerable customers in a particular way; they state on page 1 of the submission: “Efficient, safe and reliable electricity networks are a key part of today’s modern, connected society. We know that our actions can have significant consequences for the 3.7 million homes and businesses we serve, and we are conscious of our responsibilities to our customers and communities, particularly the more vulnerable. We are also aware that we can play a role in addressing some of the issues that face the most vulnerable members of our society, including those made temporarily vulnerable by storms and associated power interruptions.”
- An example is provided: “We send our customers with sight loss a welcome pack in a larger font and will provide Braille if requested.”
- The network company goes beyond an integrated understanding of vulnerability with plans for network investment to improve resilience in areas with a high incidence of vulnerability: “We have recently revolutionised the way we decide where and when to invest in our network infrastructure. Previous decisions have been solely based on network health and criticality. But using our vulnerability mapping, we have now added a third element, The Customer Factor.” They clarified however that this is a work in progress.
- The company has appointed a non-Executive Board member with experience in sustainability and engagement, and has established a Stakeholder Advisory Panel to “help shape future strategy and initiatives...which will view all decisions with consumer vulnerability in mind”. Although these are important new developments, they are fairly recent moves, and the company has not fully demonstrated that the social role is embedded as a key business driver. All in all, given the evidence submitted during the site visit and the submission, we believe that the company is clearly heading in this direction but has so far not been able to provide substantial evidence to award a full mark on this measure.

Scoring Notes

- We appreciate that there is a clear direction towards acting upon this understanding to develop initiatives that alleviate the impact on vulnerable customers and supplement these with added value services to address the vulnerability.

Enough flexibility to adapt to differences in vulnerability and changing needs of vulnerable customers [HALF POINT]

Submission Evidence

- “We understand that vulnerability issues are complex, and that there are many ways in which consumers can be vulnerable, each of which will require a tailored approach in order to be truly effective”

- “This project [Knowledge Transfer Partnership] has given us a detailed understanding of how consumers cope during a power cut, and how vulnerability isn’t just about one characteristic, such as having a chronic medical condition or a disability. Instead it varies with location, time, social, cultural factors, the individual’s characteristics and also political and situational dynamics.”
- The network company carried out specific PSR customer research to improve how they serviced customers who need to be adapted or additional services. The set of research behind the multidimensional nature of vulnerability and the responses of different categories of vulnerable customers during a power cut leads us to believe SSEN has a sympathetic and in-depth understanding of vulnerability that should enable them to adapt to differences in vulnerability.

Good understanding of the main ‘vulnerability issues’ facing its customers.

Submission Evidence

- “Building on the Knowledge Transfer Partnership, the University of Dundee looked at all publicly and privately available data and identified down to 24 key social indicators that are integral in helping customers in vulnerable situations, particularly in relation to a loss of power.”

Site Visit Evidence

- The network company submitted evidence during the site visit leading us to the conclusion that these 24 social indicators include a mix of social issues and vulnerability issues, demonstrating a good understanding of vulnerability issues.

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.

Submission Evidence

- “Our Knowledge Transfer Partnership work has led us to look more closely at vulnerability beyond the PSR through our Vulnerability Mapping project. This is a mapping tool to provide customer information across a wide range of socio-economic indicators across our network areas...”
- “We have already utilised our Vulnerability Mapping to provide additional support to the Isles of Bute and Cumbrae.”
- “SSEN has partnered with the Social Sciences Department of the University of Dundee, which researches how emergencies and natural disasters affect people with disabilities and chronic illness ... This focused on customers in vulnerable situations and how consumer vulnerability changes during storms and weather events.”
- “Building on the Knowledge Transfer Partnership, the University of Dundee looked at all publicly and privately available data and identified down to 24 key social indicators that are integral in helping customers in vulnerable situations, particularly in relation to a loss of power.” These 24 indicators, as proven by evidence submitted during the site visit, includes several indicators beyond energy-related issues.

Targets for improved performance and increased impact.

Submission Evidence

- “In addition to this we will be recruiting a specialist Vulnerability Panel during 2017/18 to help, guide and challenge us on all aspects of our support for consumers in vulnerable situations.”
- “We are investing in our website and have commissioned Sightmorse to evaluate and benchmark our website against similar businesses and organisations”
- “We will look to expand our mapping to synergise with power cuts and planned supply interruptions, which will further help to prioritise help for customers in vulnerable situations.”

Site Visit Evidence

- During the site visit, the network company mentioned that there is willingness and awareness on their side that they will need to improve the content of the welcome pack.

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 evidence of data usage in improving service development and delivery

Submission Evidence

- “The vulnerability mapping data we held showed a concentrated area of vulnerable customers on the island and it really changed my thinking on our emergency response, taking over extra generators as contingency and placing them in strategic locations.”

Site Visit Evidence

- During the site visit, the company stated that the mapping exercise informs where the vans are located during a power cut.
- During the site, the company stated that the “ongoing rolling programme of customer research throughout RIIO-ED1 including questions related to vulnerability issues ... has influenced ... promotion of PSR via door drop and leaflet ... doubled the size of our PSR team ... introducing translation services.”

Evidence of good progress in keeping records up to date.

Submission Evidence

- SSEN seems to be making progress in ensuring the quality of the data it holds on PSR customers: “Improve quality of data we have improved the data on the PSR, cleansing 82,502 records across 2016/17. With our new partnership with GBG and SGN we expect to fully update our PSR every 3 years.”

Awareness of data gaps and processes in place to address these. [HALF POINT]

Submission Evidence

- “We have also overlaid existing PSR customer localities enabling the map to provide a gap analysis of where we know many PSR eligible customers reside who aren’t yet registered.”

Site Visit Evidence

- The network company confirmed during the site visit that the vulnerability mapping informs where they should advertise their PSR services.

Scoring Notes

- We have awarded a half-point based on the site visit discussion which did not highlight an overarching goal on the number of customers who ought to be on the register. While the company can view potential PSR customers in each area thanks to their mapping exercise, it seems that the network company does not aim to have all potential PSR customers on the register. This leads us to believe that there is not a true understanding of the data gap, as in the difference between the number of customers currently on the PSR and the desired number.

As ‘Good’ plus using data to assess future risk of vulnerability and shape partnerships with other relevant organisations. [HALF POINT]

Submission Evidence

- In relation to their ‘Gap Funding’ initiative SSEN states: “We are exploring new partnerships with organisations to replicate this success in central southern England and will continue our work across Scotland over the coming year. Factoring in our latest vulnerability mapping we are targeting areas with a particularly high incidence of fuel poverty.”

Scoring Notes

- Half point has been awarded because the network company has not provided any evidence that it is using data to assess future risk of vulnerability of these or other vulnerable customers

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

Site Visit Evidence

- During the site visit, the network company stated that by using publicly available data they know how areas vulnerability looks like without having access to individual customer data.
- The network company has stated during the site visit that they aim to cleanse each customer's record every three years, this is more time than the industry average

Some consistency between data sources

Submission Evidence

- We have found no evidence in the company's submission or during the site visit to suggest that SSEN does not suffer from any data consistency problems.

Site Visit Evidence

- The network company stated during the site visit that they buy data to complement their data sets, this can lead to fewer data consistency issues but there is no evidence to suggest a lack of the problem.

As 'Weak', plus basic systems in place to keep track of data use and some feedback to data acquisition and management strategies [HALF POINT]

Site Visit Evidence

- During the site visit, the network company stated that their vulnerability mapping exercise gets updated automatically from publicly available data. This is evidence closest to a system in place to keep track of data use.

Scoring Notes

- Given the lack of detail around this topic, how tracking data use can feedback to acquisition and management strategies, we have awarded half point on this measure.

Sub Criteria C – Approach taken to management and use of PSR and associated services

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

Submission Evidence

- SSEN has taken some steps to raise the awareness of its PSR as indicated on page 4 of their submission. They state that: "We have undertaken a range of new activities this past year to raise awareness of the help we have available for vulnerable customers and to promote the PSR. We have specifically looked to target those hard-to-reach vulnerable groups."
- We note however that many of these activities (i.e., Winter preparation awareness, Social Media Campaign, PSR promotion using pharmacies, door drop and interviews with news outlets) were either not targeted, or the network company did not present any detailed evidence of how or why these had been set up to target a specific set of customers.

- A further example of how SSEN is advertising its PSR in mainly non-targeted ways: “We continue to promote the PSR with local resilience partners. This year we have sought to promote the PSR through new channels, such as a door drop to every household in our regions, an extensive winter campaign, sight loss charities, pharmacies, the Living it Up website in Scotland, and through bus pass renewals from Wiltshire Council. “
- While there are some instances of targeted advertising, whether explicit such as a trial targeting pharmacies, or implicitly such as a theatre production organised to promote resilience in schools (“Engaged with parents and grandparents, promoting use and awareness of the PSR and providing application leaflets”) these are not enough to award a higher mark.

Site Visit Evidence

- When asked why the network company had chosen to target West Sussex with winter preparation awareness campaigns the company stated that this was because of a “close correlation between fuel poverty and PSR eligibility”. Given that the area results as one of the most fuel poor in SSEN area they directed the campaign to this area. While this is an example of targeted advertising, however, SSEN is targeting a wider area and not necessarily PSR customers directly.
- Another example provided during the site visit refers to the living it up promotion with which the network company targets large numbers of hard-to-reach customers who are living at home independently for as long as possible.

Scoring Notes

- Overall, and balancing the set of evidence gathered we believe that while the network company shows actively targeted advertisement of the PSR its activities in this area are limited; for this reason, we have awarded half a point on this measure.

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

Submission Evidence

- Under the ‘Activities and outputs: targeted support’ section, the network company highlights a number of activities aimed at supporting vulnerable customers and provides some reasoning under the ‘Why we did it’ header.
- Our understanding is that, while these activities surely add some value to vulnerable customers, the network company has not provided evidence of a detailed analysis of need that indicates why they are offered to each group of vulnerable customers. Some examples are provided below:
 - In relation to ‘Gap Funding’: “To help those most in need within our communities in a cost-efficient way, allowing us to significantly expand our efforts across multiple regions.”
 - In relation to welfare packs: “We want to help customers better understand how to prepare in case they are affected by a power cut. Our community surveys identified a gap with some of our most vulnerable customers lacking key items to help during power cuts.”

Site Visit Evidence

- When asked about the impact of resilience plan on vulnerable customers the company stated that these are “helping communities stay safe in extreme weather events”. There was no evidence provided to suggest the value added of this service. The company further mentions that “Resilience funding has provided communities with a diverse range of equipment, from mobile electricity generators to two-way radio to rescue boat and emergency vehicles”, the company here states what is offered but does not provide detail on why it offers these nor how they serve vulnerable customers in particular.

A wide range of additional services offered that clearly reflect the specific needs of the core eligible group of consumers. [HALF POINT]

Submission Evidence

- SSEN shows a list of the ‘additional services’ that it provides to vulnerable customers on pages 7 and 8 of its submission. While we observe that there are some extra services offered to customers (the community resilience funding activity stands out), there is no clear list of basic services offered (except the provision of Welfare packs).
- Furthermore, it is unclear what group of vulnerable customers many of the services offered by the network company are targeting (i.e. is gap funding addressing fuel poor customers? Elderly? Others? All of the above?) as well as why SSEN decided to offer these services.
- We can, therefore, conclude that while the network company offers some interesting services and activities for its customers, the range of these is limited and only addresses some key eligible groups (i.e. customers affected by sight loss)

Site Visit Evidence

- The network company mentioned other services during the site visit. These included Haste support units, Catering vans and food units, local business support. While this is a wider set of services than what is indicated in the submissions, lack of detail around the extent of their ‘maturity’ leads us to award half a point on this measure.

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

Site Visit Evidence

- During the site visit, the network company stated that: “Anyone who would benefit from additional help, adapted services, or see more regular updates during a power cut can sign up to our PSR”

Informed by good data analysis Network Company is proactively identifying vulnerable consumers outside of “core” groups, fully reflecting fact that vulnerability can be complex and multidimensional.

Submission Evidence

- As part of the site visit, SSEN gave a demonstration of the use of its vulnerability mapping tool, one of the most developed in the industry.
- We are aware that by leveraging 24 continually updating data sources the network company can proactively identify vulnerable customers across a broad range of groups.

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

Submission Evidence

- During the site visit, SSEN stated that: “Those in temporary vulnerable situations are called after 12 months and removed or updated from the register if necessary” and added that “Customers are encouraged to suggest additional support requirements – we would never turn away any customer wanting to register for the PSR.”

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

Wide range of partnerships extending beyond the utility sector.

Submission Evidence

- The network company provides a useful overview of the partnerships that it holds with external organisations. We believe that there is a wide range of partners, also outside the energy sector (i.e. Councils, Pharmacies and Age UK). This was confirmed during the site visit.

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]

Submission Evidence

- Apart from the statement that the Network Company is using data to “...exploring new partnerships with organisations to replicate this success in central southern England and will continue our work across Scotland over the coming year” there is little to no reference of a proper partnerships strategy that indicates who SSEN partners with, why, to deliver what service, in which area.

Site Visit Evidence

- During the site visit, however, when asked to provide more detail on how and why the company entered into partnerships with the organisations listed on page 10, the network company stated that they had “Three main aims with partnerships – fuel poverty, PSR promotion, resilience”.

Scoring Notes

- There is evidence provided by the company suggesting that they develop relevant partnerships and provide a reason for how these partnerships can be used. However, given a lack of clear strategy, we have awarded half a point on this measure.

Partnerships provide some support to most groups of vulnerable consumers.

Submission Evidence

- The ‘Our Partnerships’ section on page 10 of the network company’s submission highlights how SSEN collaborates with each partner. We observe that, while most partnerships provide some effective support, the main areas that these address are:
 - PSR awareness campaigns
 - Services to customers, such as AGE UK’s befriending service
- Given the strong focus on awareness, the services offered to vulnerable customers by SSEN partners is not full and effective.

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

Site Visit Evidence

- When prompted to clarify whether SSEN has approached its current partners the network company states that in half the partnership they had indeed started the relationship. In other cases, they had either entered into a partnership via a third-party referral or a tender.

Scoring Notes

- While there is indeed evidence pointing to the fact that SSEN has a leading role in some the partnerships it has developed, we have awarded half a point for this measure given the limited number of such instances.

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

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.

Submission Evidence

- “We have worked to embed change at every level, from vulnerability training provided to front-line staff, to our board input into our vulnerability strategy and their direct input into our Stakeholder Advisory Panel.”
- “We have recently revolutionised the way we decide where and when to invest in our network infrastructure. Previous decisions have been solely based on network health and criticality. But using our vulnerability mapping, we have now added a third element, The Customer Factor.”

Site Visit Evidence

- During the site visit we enquired on the vulnerability training received by SSEN staff. The network company stated that: “This training was devised and delivered to operational and office based teams alike” and added that virtually all contact centre staff and operational staff was trained.
- Furthermore, SSEN stated that: “Refresher vulnerability training will be provided every year and the training will evolve to incorporate additional information based on customer and stakeholder feedback.”

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

Submission Evidence

- “At a working level, over 1,300 front-line staff have undergone vulnerability training this year.”
- “Our employees are trained to recognise signs of customer vulnerability, and we ensure we identify these signs early – tailoring the advice and assistance we provide to each individual customer accordingly.”

Site Visit Evidence

- During the site visit, the network company stated that “Dementia Training has been delivered as stand-alone training and embedded into our core vulnerability training” and added that “... key employees have attended the bespoke dementia awareness training from Age Scotland.”

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

Submission Evidence

- The network company provides the example of a Customer and Community Advisor who went above and beyond the call of duty to support a vulnerable customer in a period of hardship. We believe that this shows SSEN has empowered its staff to ‘do the right thing’ for customers whatever a particular situation may require.

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.

Submission Evidence

- SSEN shows how a survey of its PSR customers indicated that: “Staying warm (79%) and having no light/being unable to see (77%) were identified as the most important concerns during a power cut – this information will be used to shape welfare packs when they are reviewed this year.”
- “Our stakeholder feedback [on Community Resilience Funding] has given us a lot to think about, and we are developing our funding with this in mind; we are already extending our application period up to 10 weeks following feedback.”
- The network company states that, as a result of the learning gained through the Knowledge Transfer Partnership, they have:
 - “Improved vulnerability awareness of SSEN staff, allowing them to better assist consumers in vulnerable situations.”
 - “Improved internal processes to allow help and information to reach customers in vulnerable situations more quickly.”

Site Visit Evidence

- The network company stated during the site visit that it “Doubled the size of [their] PSR team as a result of customers saying the best thing about PSR was being able to speak with calm and caring staff” and goes on to include other examples of how customer research influenced company’s actions.

As ‘Fair’, plus services routinely monitored and evaluated to test extent to which they are meeting consumer needs. [HALF POINT]

Site Visit Evidence

- During the site visit, the network company provided evidence to support the claim that ongoing customer research had influenced company actions mentioned above.
- Furthermore, the network company stated that feedback from regional fora has been shaping decisions or actions including promotion of the PSR to cancer patients.

Scoring Notes

- We have awarded half a point on this measure since there is no evidence to suggest that services are routinely monitored and evaluated

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

Site Visit Evidence

- During the site visit the network company stated that: “There is a close correlation between fuel poverty and PSR eligibility” [answer to Q 14] and “Launching fuel poverty initiatives as the surveys have shown that this is important to customers and that low income and fuel poverty customers have a lower awareness of the services available to help them”
- When inquired on the reason for which they offer fuel poverty alleviation services through gap funding and the added value of addressing fuel poverty in the context of a customer’s vulnerability, the company was not able to articulate a clear link between fuel poverty and vulnerability issues and did not explain the impact of fuel poverty relief schemes on a customer’s vulnerability.
- During the site visit, the network company stated that targeting areas with large populations of young families to promote the PSR was driven by the fact that this is a newly extended category.

Feeds into wider service design and other general systems and processes throughout the business

Site Visit Evidence

- During the site visit, the network company stated that data behind their Vulnerability Mapping is what is allowing SSEN to include consumer vulnerability factors into our investment decisions. The company stated that “The data is currently being embedded to automatically weight investments in areas of low resilience and high need. The next steps are to embed the data further into GIS systems.”

Network company has clear plans to address shortcomings and /or barriers to performance improvement it is currently facing. [HALF POINT]

Submission Evidence

- While, as discussed in Sub Criteria A2, the network company has targets for improved performance, there is little clarity around how these targets (including a better website, a social vulnerability panel and others) will be achieved and which benefit they will bring when achieved.
- Given the lack of clarity around plans to achieve these targets we have awarded half a point on this measure

END OF REPORT

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401 N. Tryon Street,
10th Floor
Charlotte, NC 28202 -
USA

Houston

4306 Yoakum
Boulevard
Suite 350
Houston TX 77066

Milan

Via Gioberti 8
20123 Milano - Italy

Riyadh

PO Box 502665
Shatha Tower office
#2115
Dubai Media City
Dubai - UAE

Amsterdam

Barbara Strozilaan
101
1083 HN Amsterdam -
Netherlands

Doha

PO Box 27774 Doha
Tornado Tower #2238
West Bay - Qatar

London

1st Floor, 36-38
Hatton Garden
London EC1N 8EB -
United Kingdom

Montreal

2000 McGill College,
Suite 600,
Montreal QC H3A 3H3
- Canada

Rome

Via Quattro Fontane
116
00184 Roma - Italy

Brussels

Av Henri Jasparlaan,
128
1060 Brussels -
Belgium

Dubai

PO Box 502665
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#2115
Dubai Media City
Dubai - UAE

Luxembourg

7 rue Robert Stumper
L-2557 Luxembourg

New York

111 Broadway, Suite
1403
New York, NY 10005 -
USA

Singapore

3 Pickering street #02-
38
048660 Singapore

Casablanca

14, avenue Mers
Sultan
20500 Casablanca -
Morocco

Hong Kong

23/F, The Southland
Building,
48 Connaught Road
Central
Central - Hong Kong

Lyon

3 rue du Président
Carnot
69002 Lyon - France

Paris

12 rue Magellan
75008 Paris - France

Tokyo

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Trust Tower-Main
1-8-3 Marunouchi,
Chiyoda-ku
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