

BSI Response to The Utility Regulator (Northern Ireland) Best Practice Framework programme

30 August 2023

BSI Summary points

1. The Utility Regulator Northern Ireland Best Practice Framework (BPF) is delivering multiple outputs and routes for delivery, working in conjunction with the Consumer Protection Programme (CPP), established by the Utility Regulator in April 2019 and recently broadened to include a new focus on debt and affordability. BSI supports the development of best practice principles and measures for utility suppliers and distribution network companies supplying electricity, gas, and water in Northern Ireland to apply and implement in identifying, supporting, and protecting consumers in vulnerable circumstances.
2. BSI developed BS ISO 22458 to embed inclusive design to meet the needs of consumers in vulnerable circumstances¹ and so is well placed to support this new framework. BSI is pleased that the Utility Regulator is seeking adoption of [BS ISO 22458](#). Consumer vulnerability – Requirements and guidelines for the design and delivery of inclusive service in aspects of its Code of Practice for Consumers in Vulnerable circumstances.
3. BSI endorses the approach and agrees that it provides a much clearer framework to allow regulated organizations to better support and protect those in need. Overall, the Code of Practice will not only provide organizations with clear guidance on what is expected from the regulator but will have many benefits to their own businesses and ultimately provide customers in Northern Ireland excellent customer service and support for customers in vulnerable circumstances.
4. We have these comments on specific aspects of the framework:
 - Measure 1.2 recommending organizations obtain the [BS ISO 22458](#) standard and that this can be used by organizations as evidence of compliance for several reporting requirements under Principle 9. We support this recommendation. After conducting a full comparison of the standard with the Code of Practice we found that this aligns in all areas and in some the standard requirements go much further than what is expected in some of the measures. Therefore, it will demonstrate not only meeting the requirements of the Code of Practice but also show beyond practices in an organization's consumer vulnerability service provision.
 - Principle 2, Measure 2.2 we support the specific requirement to remove call duration targets for vulnerability and affordability themed calls, recognising the importance of spending time to understand a consumer needs, giving frontline staff the space to properly explore solutions and provide support. This is in accordance with our standard.
 - Section 6, we support the proposed approach with a three-step structure and the long-term goal of moving to a single point Customer Care Register. This will provide a streamlined process for consumers and allow organizations to concentrate on raising awareness and supporting those who are most vulnerable. This is best practice and should serve as an exemplar for other regulators who might consider adopting a similar approach. In this respect, it would be good to set out an envisaged timeline and target for implementation.

¹ [BS ISO 22458](#) Please find more information [here](#).

About BSI

5. BSI is the UK's National Standards Body (NSB), appointed by government to oversee the development and management of national standards by UK stakeholders, to represent the UK at the international and European standards organisations and to provide the infrastructure for UK experts to participate in international standards setting activity. BSI operates in accordance with a Memorandum of Understanding with the UK Government and has a public function in support of the UK economy and society. We bring together over 13,500 stakeholders (including government, businesses, and consumers) to facilitate the development of "what good looks like". BSI is sponsored by the Department for Business, Energy & Industrial Strategy and works across government and with regulators to advise on the use of standards to support the delivery of policy objectives.
6. Standards offer a tool to deliver influence on an international scale for the benefit of UK and global stakeholders. The UK participates in more international (ISO) standards committees than any other country so is well placed to lead the development of new standards for the benefit of UK stakeholders. Over 95% of our work is on international standards. For transboundary issues such as adapting to, mitigating climate change, and achieving net zero, the global dimension is key.
7. Standards are a critical tool to achieve industry transformation and to accelerate green innovation. BSI provides the national, regional, and international standards platforms for innovators to shorten their innovation cycles and bring new products to market. We are a partner of Innovate UK, and our work is referenced in the National Innovation Strategy, Net Zero Strategy, the Integrated Review and the TIGRR report.
8. Standards can take many guises and bespoke according to market need. BSI offers various routes and flexibility for standards development that provide important and over-arching governance around representation, process, facilitation, and content. These provide different options for development that suit a range of different circumstances. Which route is appropriate will depend on the needs of consumers, stability in the market, pace of change and innovation anticipated and required, the level of government and regulatory prescription, geography, timetables, and the extent of stakeholder, and in this instance, consumer impact.
9. At the heart of BSI's standards development is open consensus and convening process with strong external engagement and stakeholder participation and a voluntary approach to adoption.

CPIN and Consumer Interests

10. Our standards make sure consumers interests are fairly represented and incorporated into standards design. Standards being developed, reviewed, and revised are subject to the scrutiny of the independent organisation, Consumer and Public Interest Network (CPIN) – a network of individuals and organisations representing consumer interests plus BSI's Consumer Forum which is a wider open network – including CPIN – that brings together organisations from across the consumer protection landscape. This ensures the consumer lens brings consumer protection, accessibility, usability and builds confidence in the market
11. The use of standards to support regulation, legislation, and public policy in relation to support and protect consumers and especially vulnerable customers is well established. Standards offer proportionality and bring a versatile, low-burden and self-policing way of addressing policy agendas where the first instinct may be to reach for costly legislation or regulation without first considering the alternatives. Our experience is that bringing together businesses to address consumer and societal issues through new standards commonly leads to more buy-in and better

outcomes than top-down legislation and regulation. Often, co-regulation approaches provide the right framework, such as being proposed here.

12. Standards can complement outcome-focused regulation by providing an accepted means to demonstrate compliance with essential regulatory requirements. This presumption of conformity empowers businesses to innovate whilst maintaining vital public safeguards. Measurement and accreditation can support this by enabling independent, third-party verification.
13. We would be pleased to discuss any aspect of this submission and continue dialogue about how BSI can offer further support to the CPP and BPF.

BSI provide Kitemark™ certification against the recognized international standard for inclusive service and consumer vulnerability, ISO 22458:2022. Organizations that achieve the Kitemark will be considered to have addressed the relevant requirements of this Best Practice Framework. The Kitemark will also provide confidence to consumers that a high standard of protection is in place for vulnerable consumers. To find out more about the BSI Kitemark, use this [link](#).

Contacts:

Julie Walker
Global Scheme Manager - Consumer Promise at BSI
British Standards Institution
Julie.Walker@bsigroup.com

Melanie Worthy
Government Engagement Manager
British Standards Institution
Email: melanie.worthy@bsigroup.com
Tel: 07851256377