



Bryson Energy Response to the

Best Practice Framework

Proposals: Code of Practice for Consumers in

Vulnerable Circumstances

31st August 2023

BRYSON ENERGY

Introduction

Bryson Energy, incorporated in 2010, is part of Bryson Charitable Group. The Group was founded in 1906 and now has 3 main subsidiaries, namely Bryson Care, Bryson Recycling and Bryson Energy. For over 100 years, Bryson has existed to '*make the greatest difference to the greatest need*'. Every year Bryson helps over 60,000 people in Northern Ireland with a mixture of emergency relief and services to turn lives around and maximise the potential of those we serve. We currently employ over 1,000 staff in over 20 locations across the region and have a turnover of £40M.

The original remit of Bryson Energy was alleviating fuel poverty through Energy Advice and Support for households, as well as installing measures in homes and other such charitable purposes for the benefit of the public. This remit was expanded following the internal merger of Bryson Energy with Bryson Lagansports and Bryson Futureskills on 30th September 2019. This merger included responsibility for delivery of Skills Based Training, Employability and Adventure Activity programmes.

In May 2021 Bryson Energy acquired, via an asset transfer, Play Resource Warehouse Ltd, a creative arts & play charity whose focus and objects align to those of Bryson Energy. This acquisition brought further opportunity and diversification for the organisation. Within 2022/23 Bryson Energy's remit was further expanded following an internal review. This has resulted in Community Root Cause programmes being moved to Bryson Energy. This new area of work involves identifying the personal and household barriers vulnerable customers are facing; and removing these root causes through a range of community focussed initiatives addressing issues including Health, Education, Employment, Income and Environment.

In Feb 2023, Bryson Energy acquired the successful Adventure Activities provider - Pathways; which provides significant growth in Energy's Adventure Activity, Training and Wellbeing programmes. Bryson Energy currently aims to make the greatest difference targeted to those in greatest need in the following six areas:

Skills Based Training; Employability, Net Zero through Energy ,Budgeting and Home Safety Advice and Support, Creative Arts & Play, Adventure Activities and Community Led Root Cause

Bryson Energy Response

Bryson Energy welcomes the opportunity to respond to the Best Practice Framework - Proposals: Code of Practice for Consumers in Vulnerable Circumstances

Service Provision for Vulnerable Consumers

Bryson Energy welcomes the objective to address gaps in the service provision for utility customers in vulnerable circumstances. The current instability of energy prices, resulting in the energy crisis currently being experienced, reinforces the need to ensure that all NI consumers are supported and protected, in particular, those who are in vulnerable circumstances, be this long or short term..

Review

There doesn't appear to be a commitment within the document to set a timeline for review of the COP which Bryson Energy believes is necessary. While it agrees that there is need for a bedding in period a review date needs consideration.

Ten High Level Principles

Bryson Energy welcomes the principles and measures approach which it believes provides a good balance. Bryson Energy supports the ten high level principles outlined in the Approach Paper and responds to relevant measures as outlined with the Consultation.

Vulnerability Definition

Bryson Energy welcomes the proposed definition of vulnerability. However, Bryson would question who is the arbitrator in the event that a consumer sees their circumstances as qualifying them as vulnerable while the supplier does not?

Milestones

Bryson Energy have concerns about the timescales as these would appear to be overly ambitious. While it appreciates the need to ensure, as soon as possible protection and positive impacts for customers perhaps these need revisited?

Bryson do have concerns around the time and processes that will be needed integrating the current systems in order to achieve a single Care Register.

Single Care Register

Bryson Energy would seek clarification around the gatekeeper of the Registers and would like to see a commitment that this is a not for profit entity, social enterprise provider.

Communication and Simplicity

It is important for people to know, firstly there is a register, secondly are they on it and thirdly if not is the process simple to sign up through a user friendly means.

Principle 4 Measure 3 (4.3)

Bryson believes that a contact every two years is too long a period and this should be at least yearly. Working with numbers of vulnerable customers over the years Bryson's experience would be that consumers often forget they are registered and the protections that this brings them. Conversely some customers may need to be removed from the Register as their circumstances have changed and they are no longer vulnerable.

Principle 7 Measure 3 (7.3)

Bryson Energy believe the use of the term "best endeavours" is subject to interpretation and needs to be stronger and less ambiguous to ensure protection of those who disconnect.

Principle 5 Measure 2 (5.2)

Bryson Energy believe the term "take reasonable steps" is not strong enough and, again is open to interpretation. The original "not discount" should be reinstated. Bryson welcome the intended commitment to look at how suppliers can monitor the number of PPM customers that could be self-disconnecting and what additional support can be provided.

Principle 1 Measure 3 (1.3)

Bryson Energy believes that in an area of such importance that the standard should be set from the top down within an organisation and as such would like to see the Board Member identified as a vulnerability champion reinstated.

Principle 3 Measure 2 (3.2)

Bryson Energy welcome the emphasis on the communication and promotion of the Care Registers, however Bryson does believe that a centralised approach might be both more cost effective and successful in increasing awareness rather than a disparate range of messages being circulated throughout the market place. This might an opportunity for a not for profit consumer facing body to undertake this type of work who are trusted in the market place.

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