

christians
against
poverty

CAP

Consultation on Energy Supplier Customer Service Levels

CAP's official response to the
Utility Regulator's consultation

March 2024

Summary

Christians Against Poverty (CAP) has more than 25 years of experience in delivering debt help. CAP supports over 8,000 people on their journey out of debt each year and has specialist in-house teams to support vulnerable individuals. Through this experience, CAP has developed insight into the varied and complex needs of vulnerable consumers and their relationships with creditors.

Key points:

- CAP had previously responded to and broadly welcomed the Utility Regulator's consultations on the Best Practice Framework - Code of Practice for Consumers in Vulnerable Circumstances (June 2023) and the Consumer Protection Programme (December 2023).
- CAP welcomes the consistency and coherence of the Regulator's approach to consumer protection, especially those in vulnerable circumstances.
- It was welcome to see the emphasis on ensuring communication channels remained accessible, as well as the suggested review of these channels to ensure they are meeting consumer needs.
- CAP would like to see services designed in a simple and accessible way. There should not be complex steps that customers in vulnerable circumstances are required to take in order to access support.
- Ensuring that systems and processes are set up so that third parties are able to represent customers, with the required permissions, is integral to good customer support.
- The freephone telephone line requirement would benefit from some additional thought, such as including those with lived experience to participate in the design, so that this well intended policy successfully achieves its aims.
- Our comments are primarily restricted to questions 1-3, those relating to consumers in vulnerable circumstances.



Q1. Do respondents agree with proposals 1 to 3 set out in Section 3.9 Consumers in vulnerable circumstances?

New requirement 1.

Domestic consumers, in particular those in vulnerable circumstances, must be able to easily identify a method of contacting their energy supplier that meets their needs. The effectiveness of these methods must be regularly reviewed by suppliers.

CAP's response

The requirement that this service must include a range of contact methods is welcome to ensure that people can engage with their energy supplier easily and accessibly.

From research into the persistent and periodic digital exclusion people can face, CAP is aware that consumers can be digitally excluded for a variety of reasons. The lack of a suitable device, consumer capability, financial circumstances or infrastructure in a particular location are all factors in this issue.¹ As a result, CAP wishes to reiterate the need to include non-digital methods of contact within the range of options offered.

Through experience in supporting many clients with additional complex needs, CAP would also encourage the consideration of barriers people may face in engaging with letters and telephone communication methods. Steps should be taken to ensure that not only are a range of contact methods used, but also that the communication itself is customer-focused, accessible, and easy to understand.

Information about these various methods needs to be made readily available and accessible to all, but CAP would encourage an approach that also proactively offers a range of communication methods rather than people being blocked by barriers to accessing communication styles they can engage with. CAP would also encourage a 'tell us once' approach to be taken so that customers' communication preferences are taken on board and applied across the customer's journey proactively.

It is also worth noting that level of consumer trust plays a key role in determining engagement with suppliers. Therefore, it is important to set the right tone in every interaction with customers from the very start of the journey. If a consumer then gets into difficulty, they will be more likely to proactively communicate and engage.

¹ CAP (2021), Digital Divide. Available at: capuk.org/digitaldividepdf

CAP welcomes the proposal for this to be kept under review and encourages a process of continuous analysis and iteration to ensure that there are accessible methods of communication that meet any consumer's additional needs.

New requirement 2.

Suppliers must have processes in place to identify and prioritise enquiries from domestic consumers in vulnerable circumstances who may require immediate assistance, or representatives acting on their behalf and in their interest. This should include adequate training to ensure these processes are being followed sufficiently (discussed under requirement 6 in customer contact centre services)

CAP's response

CAP welcomes these proposals, especially as regards training.

It is important that services and processes are designed in an inclusive and accessible way. In CAP's Stacked Against report it was suggested that organisations create simple and accessible services.² Processes need to be simple and accessible so that those who are least able to navigate them do not get lost. Being inclusive by design ensures that vulnerable customers do not face the risk of being overlooked and shut out if they have not been able to navigate to specialist touch points, and can prevent problems occurring downstream. In this context, non-digital access without penalty is essential, as well as having clearly published telephone numbers. This is also true for customers who need the help of specialist teams that can be hard to reach because calls must be internally transferred.

There can be challenges if consumers do not identify as vulnerable, or as requiring additional support. CAP therefore welcomes the specific reference to training, including 'but not exclusive to JAM training, mental health awareness training and empathy training'. There should be regular touchpoints with customers which provide an opportunity to update the supplier if circumstances have changed, or if they require additional support.

CAP also welcomes the requirement that the Regulator would expect suppliers to have policies and processes in place to easily facilitate a person (or care professionals or advice or welfare rights organisations on a consumer's behalf) contacting a supplier on behalf of a domestic consumer in vulnerable circumstances.

² CAP (2019), Stacked Against. Available at: <https://capuk.org/about-us/policy-and-research/reports-and-publications>

While recognising the need for confidentiality and that some verification is required, any process for a consumer to nominate an individual or organisation to interact with a supplier on their behalf in such circumstances should still be accessible and reasonably straightforward, while sufficiently robust to prevent abuse.

CAP would also suggest that such professionals or organisations, with their wide experience of dealing with people in vulnerable circumstances, could also provide training or awareness sessions for suppliers' employees to highlight relevant issues and warning signs, as well as providing suppliers' employees with strategies on how best to deal with someone in difficult circumstances. This could be part of the training references at requirement 6 which CAP have not otherwise commented on.

New requirement 3.

Suppliers must implement appropriate processes/services to provide a freephone telephone number for domestic consumers that are in vulnerable circumstances. Eligible customers must be made aware of and directed to free methods of contact as soon as their supplier is aware of their eligibility.

CAP's response

CAP welcomes this proposal. A freephone number, if implemented with a well constructed awareness campaign, can be a benefit to many.

The existence of such a service needs to be made widely known and how this is done needs to be carefully considered. A dedicated number that is advertised as being for those in vulnerable circumstances, while well-intentioned, may actually act as a deterrent to some. Care needs to be given that people do not shy away from using the number, for reasons of shame, embarrassment or denial.

As per the previous response, this is an opportunity for firms to adopt a simple and accessible approach, making phone lines free to all customers, in order to better support those in financial difficulty. This would reduce the need for those struggling to proactively identify themselves and self-serve into the correct channel, which would be a challenge. It can be a huge step for someone to acknowledge an issue and make contact and this is something CAP and other free debt advice organisations find when people delay seeking debt advice. Information about a freephone number therefore needs to be handled sensitively to ensure consumers are comfortable with making contact in this way.



About Christians Against Poverty (CAP)

Christians Against Poverty (CAP) won't sit back and let poverty destroy lives. CAP is a UK-wide charity that equips local churches with the tools and expertise to support people facing debt and other financial challenges in their communities.

CAP Debt Help provides holistic support for families and individuals facing problem debt with a free face-to-face service – tackling both financial difficulty and the wider emotional impact. CAP tackles the causes and consequences of UK poverty through free community groups, also run through local churches. This includes Job Clubs, Life Skills groups and the CAP's Money Management course.

All CAP's services are provided free of charge. We are committed to our services being accessible and inclusive. We support people from all faiths. We do not discriminate by age, gender reassignment, being married or in a civil partnership, being pregnant or on maternity leave, disability, race, religion or belief, sex or sexual orientation.

Find out more about Christians Against Poverty at capuk.org.



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Requests for further information

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