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Research into simpler registration for consumers in vulnerable situations

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Contents

Executive Summary

Background and methodology

Consumers in vulnerable situations are a priority for regulators of the energy, post and water sectors. Such consumers should easily be able to access support available to them from their essential service providers, Some service providers in the regulated industries offer additional, non-financial support for consumers in vulnerable situations. There are a number of different approaches used by companies to make these services available, including Priority Services Registers (PSRs) in the energy sector, and the Additional Support Register used by Scottish Water (there is no such register in the postal sector).

The numbers of vulnerable consumers in Scotland who have registered to receive such additional support vary considerably between and within sectors, and there are concerns across the regulated industries that only a proportion of consumers who might benefit from the support are currently doing so. Regulators, and the CFU, have contended that such low uptake is caused by a range of factors, including a lack of consumer awareness of these services, inconsistencies in the types of support provided by companies holding registers, and, relatedly, the multiple registration processes in existence, which have the potential to cause confusion among consumers.

It was against this backdrop that the Consumer Futures Unit commissioned Ipsos MORI to carry out research with Scottish consumers and stakeholders, to identify mechanisms to make registration easier, more effective and more widespread.

The research was conducted using a mixed-methods approach, comprising: a review of relevant policy papers and research conducted to date; desk research to explore current provision for consumers in vulnerable situations; 15 in-depth interviews with stakeholders from across the regulated industries and beyond; 40 in-depth interviews and 2 focus groups with consumers in vulnerable situations; and an action planning workshop with key stakeholders.

Additional support provision for consumers in vulnerable situations

Findings from the desk research

The organisations covered by the review offered a wide and varied range of additional support services for consumers in vulnerable situations. The additional support services offered can be grouped into three broad categories: adapted or tailored communications for customers; measures to enhance physical accessibility of services; and measures to promote safety and security.

Energy providers tended to offer a wider range of services than other sectors, both in the regulated industries and beyond. The process by which consumers could access support services also varied between sectors. In the energy and water sectors, customers could choose to be placed on their provider's register, with the registration process broadly similar across organisations. No such register existed in the postal or, indeed, other sectors outwith the regulated industries that were covered in the review, and the means of accessing support in these sectors varied by organisation.

Industry and stakeholders' perspectives on current provision

In describing the nature of the additional support they provided to consumers in vulnerable situations, energy industry representatives tended to say that their focus was on identifying individuals' specific circumstances and needs, and adapting to these, rather than on offering a very standard suite of options. Representatives from the water and postal sectors similarly

described being committed to pursuing a very customer-centric approach to the provision of support (and indeed other) services. However, it was clear that they were some way behind the energy sector in this regard. This appeared to reflect the fact that they had faced less regulatory pressure, and the very different nature of their interactions with consumers – which, for the most part, were limited to one-off, or a series of one-off, transactions, such that they had had less impetus to learn about different individuals' needs and record this information.

Processes for obtaining access to non-financial support services varied between sectors. Energy suppliers, and the two electricity network operators, had Priority Services Registers; while Scottish Water had an Additional Support Register. The postal sector had no equivalent, reflecting the nature of its interactions with consumers, though it did offer means by which customers could request any additional support they might need.

Stakeholders generally reported that uptake of additional support services and, where available, priority service registration, had increased in recent years, and especially so over the last year. However, there was a consensus that more needed to be done to increase uptake of registers and of services generally and, specifically, that there was a need for a more "proactive rather than reactive" approach on the part of providers to ensure support services were sufficiently "visible" to consumers.

Consumer awareness and experiences of support provision in the regulated industries

Awareness of non-financial support services

Generally, consumers had low awareness of non-financial support services unless they had actually used them or knew someone who had. Participants who were aware of services had generally been told about them by their provider when setting up an account, or when their provider visited their home for another purpose. Participants who had had no such interaction with their providers (as well as some of those who had) were comparatively uninformed about available support services, unless they knew someone else who had benefitted from these. It was common for participants to suggest spontaneously that providers ought to do more to bring support services proactively to the attention of consumers, otherwise consumers may never know about provision from which they could potentially benefit.

Awareness of priority registers

Awareness of priority services registers was very mixed, with as many participants unaware as aware of them. Generally, participants had become aware of registers in the same ways as they had become aware of individual support services: they were told about them by their providers when setting up an account, or during some other form of interaction with their provider. For their part, participants who were unaware of registers expressed surprise, and in some cases annoyance, that their providers had not brought these to their attention, and reiterated their calls for more proactive awareness-raising about provision on the part of suppliers.

Experience and perceptions of registers and registration

Reflecting the mixed level of awareness of priority services registers noted earlier, around half of interviewees and focus group participants said they had gone through the process of registering for non-financial support. Perceptions of registers among those who were on them were generally positive. Registers were seen as a vital resource that made it easier for those in vulnerable situations to access essential services.

In terms of the *process* of registering for such services, the dominant view among those with experience of it was that it was quick and straightforward. Indeed, nobody identified any specific issues or problems with it. Only a couple of the registered

consumers interviewed had experience of switching suppliers and re-registering. Nonetheless, they spontaneously raised concern about the need to register with different companies when switching from one supplier to another. They felt it placed undue onus on consumers to inform providers about their support needs and potentially risked their missing out on important services.

Use and perceptions of non-financial support services

Overall, usage of non-financial support services was low, even among some of those who were on a register. However, perceptions of additional support services among those who had used them were overwhelmingly positive. Participants felt that the services were adequate, appropriate for their needs, and generally of good quality. They made no specific suggestions for additional, or improved, services.

Among those that had not used any of the additional support services, for some this reflected the fact that they were unaware of the existence of services. Others felt they did not need support – either because they did not consider themselves to be in a vulnerable situation, because they had not experienced any difficulties or because they had an informal support network.

Improving the consumer experience

Attitudes towards data-sharing between providers

Consumers identified a range of potential benefits of data-sharing; the main one being that it would help to promote awareness of available support services and, relatedly, see consumers gaining *automatic* access to those services for which they were eligible. Participants also commented that data-sharing would help obviate the burden on consumers of having to contact multiple organisations to explain their circumstances, request access to services and/or to register. At the same time, most consumers also raised concerns around data-sharing between suppliers. Most commonly, they were concerned about the potential for their data to "fall into the wrong hands" and be subject to misuse.

Participants stressed the importance of their consent being acquired in advance of their data being shared with another provider. They would also want to be informed about the nature of the data-sharing proposed, and be reassured that their personal details would be treated securely and not shared beyond essential service providers.

Industry representatives and other stakeholders, though generally aware of the potential benefits of data-sharing, felt that the necessary systems were not yet in place to enable it to be taken forward in the way consumers envisaged. They were concerned about potential confusion among providers regarding accountability and who would be responsible for protecting, as well as updating, the data. They also identified practical barriers to data-sharing arising from differences between existing registers, in terms of the format in which organisations record consumers' details as well as the *type* of details they record. Further, stakeholders felt that certain conditions would need to be met in order for data-sharing to work; not least very clear and transparent communication with consumers about precisely how their data would be used.

Other improvements: a single register?

Participants perceived a number of potential advantages of a single register. In particular, they contended that it would promote greater consumer awareness of, and consequently access to, support services. They also widely commented that a single register would serve as an effective "one-stop shop" such that, once consumers have registered, they can rest easy in the knowledge that providers were aware of their circumstances and needs, and would cater for them accordingly.

Support for a single database was, however, largely contingent on their being provided with clear information about how their data would be used, and their consent being requested prior to any new instance of a supplier gaining access to it. Some consumers were, in addition, keen to retain a degree of control over which of their details were shared. While they were generally happy with their *support needs* being shared, they were less so about the idea of the specific details of their conditions or vulnerability being shared. More generally, participants commonly expressed a view that measures should be in place to ensure that any single database could only be accessed and used for the express purpose of targeting support services.

Industry representatives and other stakeholders held more mixed views than the consumers on the desirability and practicality of a single database. On the one hand they shared the consumers' views that such a single resource could potentially simplify the process and mean that consumers would be free from the burden of having to register with multiple suppliers and on multiple occasions. At the same time, there was a strong sense that the change would risk losing some strengths of the existing system, while potentially creating a range of unintended consequences: for example, it was felt that an overly standardised approach could result in the information contained in the database being too general to allow for the provision of services that were truly tailored to individuals' needs. Some stakeholders also identified practical challenges related to maintaining the accuracy and currency of a single register, given that certain vulnerabilities are transient and subject to change.

Recommendations

The research identified a number of recommendations for improving the process of providing non-financial support for consumers in vulnerable situations.

Identifying and engaging with consumers in vulnerable situations

- **Better consumer-facing information about support services focused on consumer needs, rather than around categories of vulnerability,** asking questions such as *"what sort of help do you need?"* rather than *"which of these categories do you fit into?".*

- **Sharing of good practice in identifying and engaging with consumers,** including signposting of services between and across organisations and sectors; and getting out into the community.

- **More widespread training of staff to identify consumers in need**, drawing on examples of good practice.

- **Closer collaboration and information-sharing between third sector, public sector and providers**, particularly so that third-sector and public-sector organisations could easily signpost consumers to support from their essential service providers.

- **More widespread gathering of consumer feedback**, through which providers may uncover opportunities to enhance service quality further, and to respond more closely to the needs of consumers.

Simplifying the current process

- **Putting procedures in place to support the sharing of information between organisations.** It was stressed that any sharing of information should be predicated on clear and unambiguous consent being acquired from consumers. It

was seen as essential that consumers are made aware of what information was being shared, who it was being shared with, and for what purpose.

- **Simplifying the current registration process through a central resource**. Rather than a single register, which may create a number of challenges relating to integration of data from numerous organisations, it was felt that a more practical and consumer-centred alternative would be a single *registration process* involving a central resource through which consumers provide their details, and are then signposted towards the registers that best meet their needs.

- **Testing the concept of a single registration process through area-based pilots,** targeted in areas with high proportions of people in vulnerable situations or in areas that experience or are likely to experience high levels of supply interruption.

Data cleansing

- **Improved approaches to data cleansing to ensure that consumer details are as up to date as possible**, including removing deceased consumers from their registers and other databases, and removing those who are no longer in a vulnerable situation.

1. Introduction

Background to the research

Consumers in vulnerable situations are a priority for regulators of the energy, post and water sectors. Such consumers should easily be able to access support available to them from their essential service providers[1]. Across the regulated industries, and beyond, it is acknowledged that the drivers of vulnerability are many and varied, and that vulnerability can affect anyone at any point in time. Vulnerability can therefore be difficult to define precisely, though regulators now use broadly similar definitions[2]. For example, Ofgem defines a consumer as vulnerable when their: *"personal circumstances and characteristics combine with aspects of the market to create situations where he or she is: significantly less able than a typical consumer to protect or represent his or her interests in the energy market; and/or significantly more likely than a typical consumer to suffer detriment, or that detriment is likely to be more substantial."*

Some service providers in the regulated industries offer additional, financial and non-financial support for consumers in vulnerable situations. Financial support includes measures such as monetary benefits, discounts, rebate or fuel poverty schemes. Non-financial support includes such measures as providing bills and other literature in accessible formats such as large print or Braille; advance warning of, and tailored support during planning for, supply interruptions; and priority support in an emergency. There are a number of different approaches used by companies to make these services available, including Priority Services Registers (PSRs) in the energy sector, and the Additional Support Register used by Scottish Water (there is no such register in the postal sector). Over a number of years such registers have been developed and created by companies independently in response to the regulators' respective licence conditions[3].

The numbers of vulnerable consumers in Scotland who have registered to receive such additional support vary considerably between and within sectors, and there are concerns across the regulated industries that only a proportion of consumers who might benefit from the support are currently doing so. For example, Ofgem recently reported that the proportion of consumers registered on energy suppliers' registers continued to be "substantially lower" in Scotland than in the other GB nations[4].

Regulators, and the CFU, have contended that such low uptake is caused by a range of factors but not least a lack of consumer awareness of these services. Research by the CFU[5] for example showed that only a quarter of consumers were aware of registers, and among those who were eligible to be on a Priority Services Register, less than one in five had already signed up to one. Other factors seen to have had an impact on low take-up include inconsistencies in the types of

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[1] UK Regulators Network, 2017. *Making better use of data: identifying customers in vulnerable situations*. Available at: http://www.ukrn.org.uk/wp-content/uploads/2017/10/Making-better-use-of-data-identifying-customers-in-vulnerable-situations.pdf

[2] National Audit Office, 2017. *Vulnerable consumers in regulated industries*. Available at: https://www.nao.org.uk/wp-content/uploads/2017/03/Vulnerable-consumers-in-regulated-industries-Summary.pdf

[3] Energy Networks Association. *Safeguarding Customers overview*. Available at http://www.energynetworks.org/info/safeguarding-customers/safeguarding-customers-overview.html

[4] Ofgem, 2018. *Vulnerable consumers: in the retail energy market: 2018*. Available at: https://www.ofgem.gov.uk/system/files/docs/2018/06/ofgem_vulnerability_report_2018.pdf

[5] Citizens Advice Scotland, 2018. *Consumer Tracker Survey (Wave 2)*

support provided by companies holding registers; and, relatedly, the multiple registration processes in existence, which have the potential to cause confusion among consumers[6] – as well as to burden them when they are already facing difficulties.

In response to these issues, the National Audit Office recently highlighted the need for regulators to do more to support vulnerable consumers – the numbers of which, as noted by the UK Regulators Network (UKRN), show no signs of abating; not least as a result of an ageing population[7]. The regulators have followed suit with commitments to do so. In particular, Ofgem recently added a broad principle to its Standards of Conduct, making it clear that suppliers are accountable for protecting and empowering consumers in vulnerable situations.[8] The principle states that: *"suppliers must seek to identify domestic consumers that are in a vulnerable situation in a way that is effective and appropriate, and that they must respond to the needs of these consumers so they are treated fairly."*

The UKRN has specifically made reference to the need for suppliers to make more effective use of consumer data, facilitated by non-financial vulnerability data-sharing, to reduce the burden on consumers and the need to register with multiple suppliers (UKRN, 2017). As such, regulators are working with suppliers to help improve awareness of PSRs, and to update and create new mechanisms allowing the effective sharing of data (Ofgem, 2017). This is reflected in the CFU's Work Plan for 2017-18[9], which prioritises the need *to "examine the potential to deliver a single, integrated registration scheme for consumers in vulnerable situations".*

The need to maintain consumers' rights to privacy and protection of their personal data – particularly important for consumers in vulnerable situations – will require to be a central consideration of any shift towards increased data-sharing. The EU's General Data Protection Regulation (GDPR), which came into force in May this year, places greater emphasis on the importance of adequate protection of personal data, which will have implications for any potential change in approach to the way data from consumers in vulnerable situations are handled.

It was against this backdrop that the Consumer Futures Unit commissioned Ipsos MORI to carry out research with Scottish consumers and stakeholders, to identify mechanisms to make registration easier, more effective and more widespread.

Research question and objectives

The overarching research question was: *What are the experiences and perspectives of Scottish consumers in vulnerable situations with regard to additional support provided by essential service providers, and how could the customer experience and process of registering across sectors for additional forms of support be improved?*

The objectives of the research were to:

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[6] See, for example: National Audit Office, 2017. *Ofwat, Ofgem, Ofcom and the Financial Conduct Authority: Vulnerable consumers in regulated industries.* Available at: https://www.nao.org.uk/wp-content/uploads/2017/03/Vulnerable-consumers-in-regulated-industries.pdf

[7] https://www.gov.scot/Topics/People/Equality/Equalities/DataGrid/Age/AgePopMig

[8] Ofgem, 2017. *Decision to modify the domestic and non-domestic Standards of Conduct.* Available at: https://www.ofgem.gov.uk/system/files/docs/2017/08/final_decision_-_standards_of_conduct_for_suppliers_in_the_retail_energy_market.pdf

[9] Consumer Futures Unit 2017-18 Workplan. Available at: https://www.cas.org.uk/system/files/publications/cfu_2017-18_work_plan.pdf

- review the use, development and outcomes of consumer vulnerability registers in the energy, water and postal industries – and beyond – in Scotland.

- explore the experiences – positive and negative (including barriers) – and perspectives, on vulnerability, registration with service providers (including data-sharing), and the consequent delivery of extra support among vulnerable consumers.

Methodology

The research was conducted using a mixed-methods approach, comprising:

- a scoping phase, involving a review of relevant policy papers and research conducted to date

- desk research to explore current provision in the regulated industries and beyond for consumers in vulnerable situations

- in-depth interviews with stakeholders from across the regulated industries and beyond

- in-depth interviews and focus groups with consumers in vulnerable situations

- an action planning workshop with key stakeholders.

Scoping phase

The study began with a brief scoping stage, during which the research team familiarised themselves with relevant policy papers and research conducted to date. The review informed the design of the subsequent stages and ensured that the research design was grounded in the existing knowledge base.

Desk research to explore current provision

The desk research involved a review of the provision of 35 organisations within the regulated industries, and 10 organisations from other sectors that provided services to consumers; namely the telecommunications, financial services, transport, environment, fire and rescue, and police sectors.

Table 1.1: Sectors included in desk research

Regulated industries (35)	Energy (32) Water (1) Post (2)
Other sectors (10)	Telecommunications (3) Financial services (3) Transport (1) Environment (1) Emergency services (2)

It should be noted that support for vulnerable consumers is not restricted to the sectors included in the desk research. Vulnerable consumers also receive a range of non-financial support from local authorities[10] and public-sector organisations working in healthcare, social work, housing and criminal justice. For the purpose of this research, however, we have focused on those organisations that are most closely comparable to those within the regulated industries, and therefore concentrated on those whose services are available to a wide range of consumers.

Primarily the review drew on information available on organisations' websites but, where necessary, supplementary telephone calls were made to relevant representatives of the organisations concerned.

A pro-forma was developed to record details of the provision of each organisation, such as the extent of any information provided for consumers in vulnerable situations; the nature of any non-financial support services offered and any system of registration.

In-depth interviews with stakeholders

Fifteen in-depth interviews were conducted by telephone with stakeholders from within the regulated industries and beyond, including the emergency services who have direct engagement with individuals in a range of vulnerable situations. A list of stakeholders was provided by the CFU and all individuals on the list were contacted by a member of the research team by telephone, and invited to take part in the research.

The final achieved sample of stakeholders is set out in Table 1.2 below.

Table 1.2: Profile of stakeholders interviewed

Industry/body	Number of participants
Energy sector	8
Water sector	1
Postal sector	1
Regulators	2
Scottish Government	1
Other public-sector organisations	2

In-depth interviews and focus groups with consumers in vulnerable situations

Forty in-depth interviews with consumers in vulnerable situations were conducted across Scotland either face-to-face or by phone, depending on participants' circumstances (for example, the nature of their vulnerability; geographical location) and preferences. The focus groups were carried out in Edinburgh and Glasgow, with a total of ten participants attending the two.

These two methods were chosen to ensure that the research objectives were explored fully. The in-depth interviews allowed the research team to explore more personal facets of the topic, such as participants' attitudes towards vulnerability registers/registration; their experiences of registration; the perceived quality, appropriateness and adequacy

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[10] For example, Dumfries and Galloway Council and the NHS have created a vulnerable persons at risk database: https://www.ordnancesurvey.co.uk/business-and-government/case-studies/dumfries-galloway-persons-risk-database.html

of additional support; and attitudes towards data-sharing. The focus group covered similar issues, but provided more time for the research team to explore in detail participants' perspectives on alternative registration options/solutions, and for participants to discuss these issues and work together to develop ideas.

To identify participants in vulnerable situations, a potentially hard-to-reach audience, an initial sample was purposively drawn from the Scottish Household Survey (SHS) re-contact database[11]. This is a database of people who have previously taken part in the SHS and agreed to be re-contacted for future research. In the case of vulnerabilities for which limited SHS sample was available (for example sensory impairments, pregnancy, and English as a second language) participants were additionally identified with the assistance of relevant 'gatekeeper' organisations, including 3D Drumchapel, the Forth Valley Sensory Centre, Dr Bell's Family Centre and LINKnet Mentoring.

In categorising different types of vulnerability or vulnerable situations, the sampling approach followed the eligibility criteria used for the energy sector's Priority Services Register (PSR)[12], along with the energy sector's 'needs codes' to provide for a more 'granular' approach. Additionally, the categories were extended to include people in other circumstances that might make them less able than the average consumer to protect or represent their interests, or to suffer detriment, and thus potentially more likely to need additional support – specifically, consumers who are:

- on a low income – who may struggle to manage their household finances and require additional assistance reading and understanding their bills

- living in remote communities – who may have more limited access to services and thus be more severely affected by service closures or supply interruptions

- have no or limited access to the internet – who may struggle to access support (or other) services offered by service provider(s).

More generally, efforts were made to include both consumers who were on a Priority Services Register and consumers who were not. Originally, the intended balance was tipped more towards the former given the focus on exploring consumers' experiences of registration, and the appropriateness and adequacy of the support provided. However, during recruitment it was clear that awareness and take up of Priority Services Registers among potential participants was lower than anticipated, making it difficult to identify those that were registered. Ultimately, therefore, approximately half of the achieved sample were registered, while the other half were unregistered.

All those consumers sampled were telephoned by a member of the research team and told about the research before being invited to participate. Those agreeing in principle to participate were then asked a series of 'screener' questions to double-check their eligibility against the target sample profile.

The final achieved sample of vulnerable consumers is set out in Table 1.3 below.

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[11] The SHS is a large multi-purpose survey commissioned by the Scottish Government and undertaken by Ipsos MORI. The survey interviews approximately 10,000 households each year collecting a wide range of data on the characteristics, attitudes and behaviour of Scottish households and adults.

[12] https://www.ofgem.gov.uk/consumers/household-gas-and-electricity-guide/extra-help-energy-services/priority-services-register-people-need

Table 1.3: Profile of consumers interviewed

	Number of participants		
Registration status	In-depth interviews	Focus groups	Total
Registered with at least one provider	20	4	24
Not registered with any providers	20	6	26
Type of vulnerability			
Of pensionable age	5	4	9
Physically disabled	5	2	7
Learning difficulties/mental health condition	4	1	5
Chronically sick/long-term medical condition	6	3	9
Hearing impairment	4	-	4
Visual impairment	5	-	5
Pregnancy/with small children (<5)	6	-	6
English as a second language	5	-	5
Other, 'cross-cutting' characteristics			
On a low income	10	3	13
Urban[13]	28	10	38
Rural	12	-	12
Does not use the internet	10	-	10

Fieldwork and analysis

All interviews and focus groups were structured around discussion guides, designed by Ipsos MORI in consultation with the CFU. Though participants were recruited on the basis of a single vulnerability, some had multiple vulnerabilities – for example, some of the older people interviewed had physical disabilities, and some of those living in remote, rural locations had children – and this was reflected in the researchers' lines of questioning.

The fieldwork was carried out between 19 March 2018 and 26 June 2018 by the core members of the Ipsos MORI research team. Consumers who took part in an in-depth interview were given £25, and those who took part in a focus group £40, as a 'thank you' for their time and to cover any expenses incurred.

All interviews and focus groups were audio-recorded (with participants' permission). The recordings were transcribed for analysis purposes. The transcripts and interviewer notes were then systematically analysed[14] to identify the substantive themes that emerged in relation to each question in the discussion guide, along with key points and illustrative verbatim comments. This ensured that the analysis of the data was rigorous, balanced and accurate, and that key messages or concepts were brought out. It was also flexible enough to allow links and connections across different themes or sub-themes to be made, and for moments of interpretive insight and inspiration to be recorded.

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[13] Using the Scottish Government's six-fold urban/rural classification.

[14] The interviewer notes, supported by audio recordings and transcripts, were summarised under key thematic headings, structured around the research questions. The resultant 'thematic matrix' was then systematically interrogated to identify the full range of views and experiences on each issue/question; differences in views and experiences (e.g. between domestic and non-domestic users, supply type, local authority etc.); and the relationships between particular views and experiences.

Action planning workshop with key stakeholders

The final phase of the research involved a workshop with key stakeholders from across the regulated industries and beyond, with the purpose of sharing emerging findings from the research and developing recommendations for how the process for providing support for consumers in vulnerable situations could be improved.

A list of stakeholders was identified by CFU, and all individuals on the list were contacted by a member of the research team, initially by email and then by phone, to take part in the workshop. In total, 12 stakeholders attended the workshop, including representatives from the Scottish Government and from the energy, postal, and water sectors.

The workshop involved:

- a presentation of the key findings from the research

- group discussions on the key findings, including participants' initial, top-of-the head thoughts and ideas for potential actions to improve provision for consumers in vulnerable situations

- a series of exercises to develop ideas further for actions and create a list of recommendations to improve provision for consumers in vulnerable situations.

The workshop took place on 7 June 2018.

Interpreting qualitative findings

Unlike survey research, qualitative social research does not aim to produce a quantifiable or generalisable summary of population attitudes, but to identify and explore the different issues and themes relating to the subject being researched. The assumption is that issues and themes affecting participants are a reflection of issues and themes in the wider population concerned. Although the extent to which they apply to the wider population, or specific sub-groups, cannot be quantified, the value of qualitative research is in identifying the range of different issues involved and the way in which these impact on people.

Structure of the report

The following chapter of the report sets out the findings of the desk research and stakeholder interviews exploring current provision of non-financial support for consumers in vulnerable situations. Chapter 3 presents the findings of the qualitative research with consumers, looking at their awareness and experiences of non-financial support and registers. Chapter 4 presents findings relating to potential improvements to the current registration process. Chapter 5 presents conclusions and recommendations, emerging from the research.

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2. Additional support provision for consumers in vulnerable situations

This chapter presents findings from the review of additional support provision in the energy, water and postal sectors, and beyond, for consumers in vulnerable situations. It incorporates findings from both the desk research and the in-depth interviews with stakeholders, and considers: how the industries concerned defined vulnerable consumers; the range and types of support they offered; how this varied by and within sector; the processes by which consumers can gain access to the support; and the accessibility of related information.

Findings from the desk research

As detailed in the previous chapter, the desk research involved a review of additional, non-financial support offered by 35 organisations from within the regulated industries, and 10 organisations from other sectors (telecommunications, financial services, transport, environment, and emergency services). The research considered provision along two main lines. Firstly, the extent and nature of the support available; and, secondly, the accessibility or 'visibility' of this support.

Of the initial list of organisations identified for inclusion in the review, the research team was able to ascertain the additional support provision of all but three; all of which were in the energy sector. For these three organisations, information about additional support provision was unavailable online and they did not respond to phone or e-mail requests made by the research team. Thus, the analysis that follows is based on findings for a total of 42 organisations, representing a range of sectors, sizes and length of operation.

Definitions of vulnerable consumers

Organisations used a range of terms to refer to people in vulnerable situations. As well as the term "vulnerable", which was commonly used, other terms included "customers that need extra support" and "customers who need a little extra help".
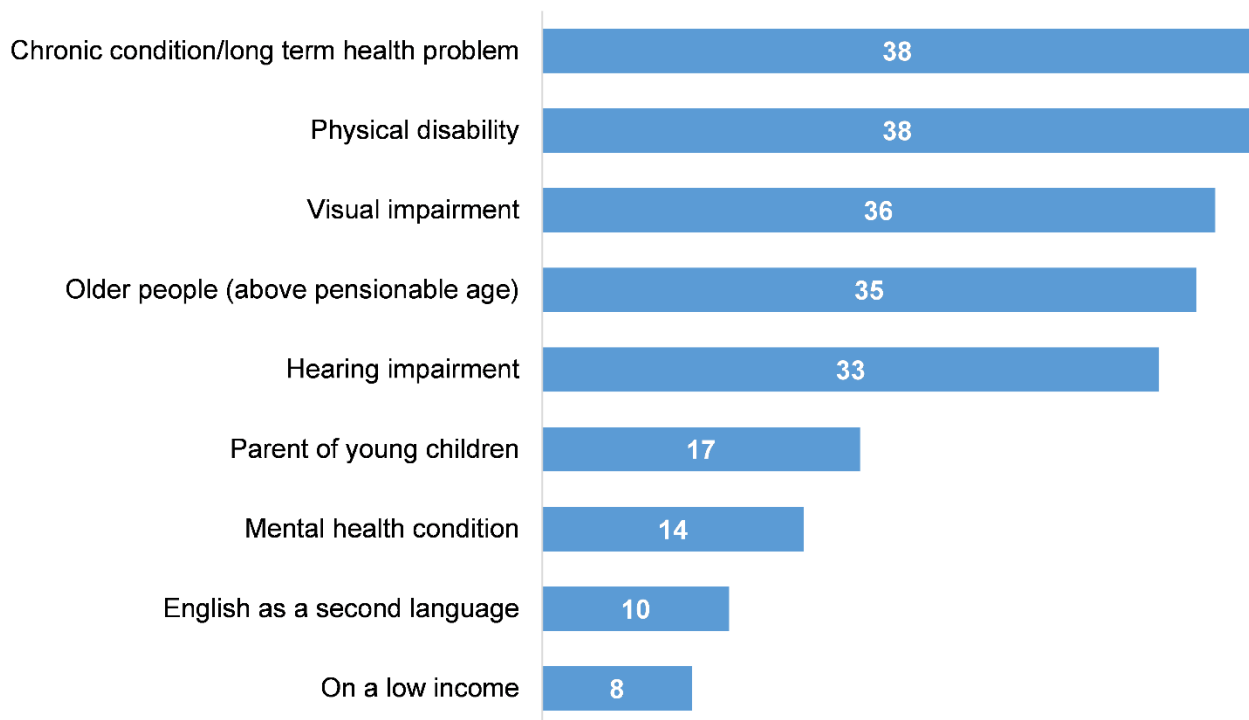
As well as these more general terms, almost all organisations listed specific categories of consumers in vulnerable situations for whom support was offered. Nine such categories were referenced repeatedly across multiple organisations, though some of the nine were referenced more than others, as shown in Figure 3.1. Those most commonly referenced included: chronic conditions or long-term health problems, physical disabilities, visual impairment, hearing impairment, and older age. Those referenced comparatively less frequently were having young children or being pregnant, having a mental health condition, having English as a second language, and being on a low income. In addition to these categories, several organisations identified other vulnerable circumstances for which they offered support. For example:

- some energy providers, particularly the "Big Six" firms, included reference to "life-changing events" that may lead consumers to be vulnerable, such as bereavement, relationship breakdown, job loss or recovery from illness or injury

- telecommunications providers referenced support services for people with speech difficulties

- the emergency services offered support for people who were vulnerable due to alcohol or substance misuse issues, and

- the Scottish Environment Protection Agency (SEPA) offered additional support for people who had been victims, or were at risk, of flooding.

These findings notwithstanding, it should be noted that several organisations stated explicitly that the categories they referenced were not exhaustive, and that additional support was also available for other individuals "in need."

Figure 2.1: Categories of vulnerability commonly referenced by organisations

Category	Value
Chronic condition/long term health problem	38
Physical disability	38
Visual impairment	36
Older people (above pensionable age)	35
Hearing impairment	33
Parent of young children	17
Mental health condition	14
English as a second language	10
On a low income	8

Base: *All organisations providing information about services for vulnerable people (42)*

There was no broad sectoral-based variation in the range and types of vulnerability referenced by organisations. Neither was there a great deal of variation between regulated and non-regulated industries – with the exception that just one organisation outside of the regulated industries mentioned support for parents of young children and just one mentioned English as a second language (a telecommunications organisation and a financial services organisation respectively). A greater degree of variation was evident *within* sectors: in both the energy and telecommunications sectors the number of vulnerability categories cited range from two (hearing impaired and visually impaired) to nine.

Nature of support provision

The organisations covered by the review offered a wide and varied range of additional support services for consumers in vulnerable situations. Of course, varied provision in part reflected the fact that the types of additional support consumers might need from different sectors also varied. At the aggregate level, however, the additional support services offered can be grouped into three broad categories:

1. **Adapted or tailored communications for consumers** including:

   o adapted formats for people with visual impairments (Braille, audio, or large print)

   o adapted formats for people with hearing impairments (British Sign Language (BSL) video, textphone)

   o interpreters for people whose first language was not English

   o nominated person schemes, through which letters and bills could be sent to someone better placed to manage them.

2. **Measures to ensure the physical accessibility of services**, including:

   o the relocation of energy meters that are difficult to reach

   o meter reading services for consumers who found it difficult to do this themselves

   o reasonable adjustments to ensure physical access to facilities such as Post Offices, transport services and bank branches.

3. **Measures to promote safety and security** including:

   o free annual gas safety checks

   o password schemes to protect against bogus callers

   o advance warning of service interruptions, for example to gas, electricity or water supplies

   o priority support in the event of an emergency, for example, the provision of bottled water or alternative heating during a supply disruption.

The specific types of service provided most commonly across sectors and organisations are detailed in Table 2.1. As the types of support consumers may need vary by sector, it is difficult to make broad inter-sectoral comparisons concerning the nature of provision offered. This notwithstanding, the energy sector appeared to offer a wider range of support services than other sectors, with ten different services commonly mentioned by organisations in this sector. Of the ten, the most oft-cited were nominated person schemes; password or doorstep identification schemes; adapted or tailored communications (for the visually impaired and hearing impaired); and meter reading and meter relocation services. Also provided, but by a smaller number of energy organisations, were advance warning of supply interruptions; priority help in the event of an emergency; free gas safety checks; and interpreters for people with English as a second language. All of the "Big Six" companies listed at least eight of the aforementioned services, though several smaller, newer companies did too.

Scottish Water listed fewer support services than many of the energy companies, but those it did list reflected those offered most commonly in the energy sector (e.g. adapted communications, password scheme, and interpreters for non-English speakers).

In the postal sector, the number of support services available was more difficult to discern, as neither Royal Mail nor the Post Office had a central web page where this information was summarised. However, from the sources that were

available (such as individual web pages and downloadable documents located in different sections of the websites), it appeared that the services they provided concentrated on communications and accessibility; for example, adapted communication formats for the visually and hearing impaired; nominated person schemes; and a commitment to ensuring that premises and post boxes were accessible to all. The Post Office, in addition, offered a priority broadband repair service for its vulnerable consumers.

The telecommunications and financial sectors offered similar types of support to those most commonly provided in the energy and water sectors; specifically, adapted communications for the visually and hearing impaired, and nominated person schemes. Telecommunications companies additionally offered adapted phones for those with speech, hearing or dexterity difficulties, and emergency relay text services to enable those with speech difficulties to contact emergency services.

Beyond the provision outlined above, a number of other, more sector-specific forms of non-financial support were identified in the review. Most notably:

- Scotia Gas Networks (SGN)[15] offered locking cooking valves to provide additional safeguarding against gas leaks for people in vulnerable situations, particularly those with conditions such as Alzheimer's or autism.

- SEPA offered advance warning of flooding for those in areas identified as potentially high-risk.

- Transport Scotland's National Entitlement Card offers free travel for the over-60s and those with a disability.

- Police Scotland's Keep Safe initiative (delivered in partnership with I Am Me Scotland), encourages local business to become "Keep Safe" places in the community for anyone feeling lost, frightened or a victim of crime. It is particularly targeted at those with a learning disability, dementia or Alzheimer's.

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[15] SGN is the company which principally owns and manages the gas distribution network and pipes in Scotland. It is not itself a retail gas supplier to end customers.

Table 2.1: Support services commonly offered, by sector[16]

	Number of organisations providing each service by sector				
	Energy	Water [17]	Postal	Tele-communications	Financial services
Number of companies reviewed	*32*	*1*	*2*	*3*	*3*
Nominated person scheme	26	-	1	3	3
Password/doorstep identification scheme	26	1	-	-	-
Adapted communication for visually impaired	25	1	1	3	3
Meter reading	24	n/a	n/a	n/a	n/a
Meter relocation	21	n/a	n/a	n/a	n/a
Adapted communication for hearing impaired	19	1	1	3	3
Priority help/fault repair in the event of an emergency	16	-	1	1	n/a
Advance warning of supply interruptions	16	-	n/a	n/a	n/a
Gas safety checks	10	n/a	n/a	n/a	n/a
Alternative communication for non-English speakers	9	1	-	-	-

Processes for accessing services

Processes by which consumers could obtain access to non-financial support services varied by sector. In the energy and water sectors, consumers could request additional support from their provider by making contact with them directly (by telephone, email, or by completing an online form, depending on the organisation) and requesting the specific service needed. Consumers could also choose to be placed on registers held by their providers to ensure they *automatically* received additional support.

Of the 29 energy suppliers covered in the review, all had a Priority Services Register (PSR). Electricity Distribution Network Operators (DNOs)[18] also held their own PSRs, to enable them to identify people who may need priority support in the event of a power cut. SGN did not hold its own register; though it did encourage consumers to sign up for registers held by their energy suppliers (the reason given for this was that gas network companies do not hold customer names, only their meter point reference number and address). Scottish Water, meanwhile, had an Additional Support Register, similar to the energy company PSRs.

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[16] As the services offered by those in the environmental and emergency services sectors are fairly unique to those sectors, comparison with the support services provided in other sectors is difficult and they are therefore excluded from the table but referred to in the preceding narrative.

[17] Note that only one organisation from each of the water, transport and environment sectors was covered in the review.

[18] DNOs are the companies licensed by Ofgem to distribute electricity. They own and manage the system of towers, cables, substations and equipment which bring electricity from the national transmission network to end users. They are not themselves retail electricity suppliers to end users. The various suppliers pay DNOs to transport electricity through the wires to homes and businesses. There are six DNOs across GB, two of these operating in Scotland – Scottish and Southern Electricity Networks in the Northern part of Scotland including the Islands, and SP Energy Networks in the Southern part of the country.

In terms of the regsitration process, this was broadly similar across the energy organisations and Scottish Water, and there was no notable variation by type of company (size, length of operation etc.). Most of the organisations provided a telephone number or email address that consumers could use to sign up to the register or find out more about it. Several also offered online or paper-based registration forms, which included questions around the consumer's needs and circumstances, as in the examples shown below.

Figure 2.1: Extract from Scottish Water's online registration form

Figure 2.2: Extract from Good Energy's online registration form
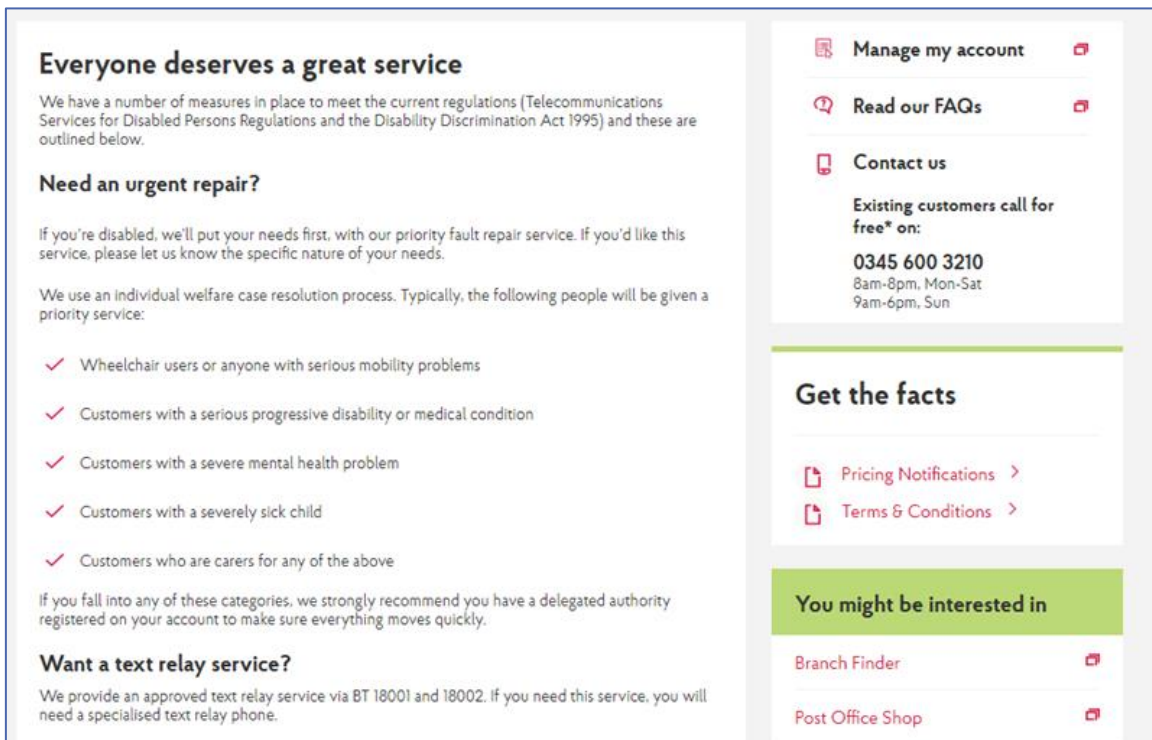
In the postal sector, there were no equivalent registers. However, there were mechanisms by which consumers could request any additional support they might need. The Post Office provided a free phone number that consumers could use to find out about such services, including the priority fault repair service (for broadband customers), text relay service and third-party bill management.

Figure 2.3: Extract from the Post Office's website

Organisations outwith the regulated industries similarly did not hold registers that consumers in vulnerable situations could sign up to. However, like the postal sector, most of these organisations did include on their websites phone numbers consumers could call to arrange access to support services. Telecommunications companies tended also to offer access to support via other means, including email, online forms, live chat and live BSL video chat. Financial services companies offered similar options, as well as noting that consumers could visit their branches to arrange for support services to be set up.

Acessibility of additional support services and registers

The majority of organisations covered in the review (36) provided details of their additional support services within a dedicated section of their website, and around a third (13) of these provided a document or brochure to download for more details. In most cases, these dedicated sections of the website consisted of a full page presenting details of the support available and ways of getting in touch to find out more. These pages tended to have titles that either broadly referenced the nature of the support (e.g. "Help for vulnerable customers") or referred specifically to the Priority Services Register (see Images 2.4 and 2.5).

Figure 2.4: Extract from iSupply's website - "Help for Vulnerable Consumers"

Figure 2.5: Extract from OVO Energy's website - "What is the Priority Services Register?"
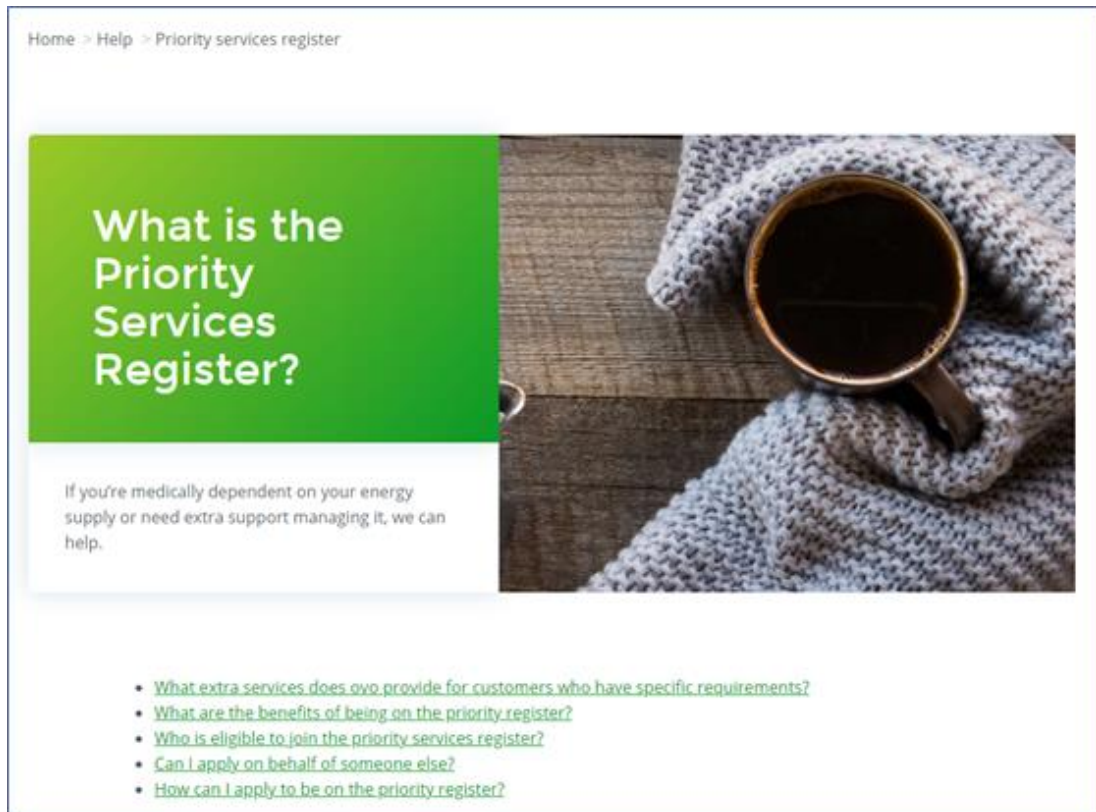
The ease with which this information could be found varied widely, both between and within sectors, however. Generally, the energy and water sectors provided the information in a clearer, more accessible way than other sectors, typically signposted via obvious, clearly labelled links that took the user from the homepage of the website through to the relevant dedicated section. For example, in the extract below the main web page has a drop-down menu titled "Help", with a "Priority Services" link which takes the user to a detailed page explaining the Priority Services Register.

Image 2.6: Extract from Better Energy's website
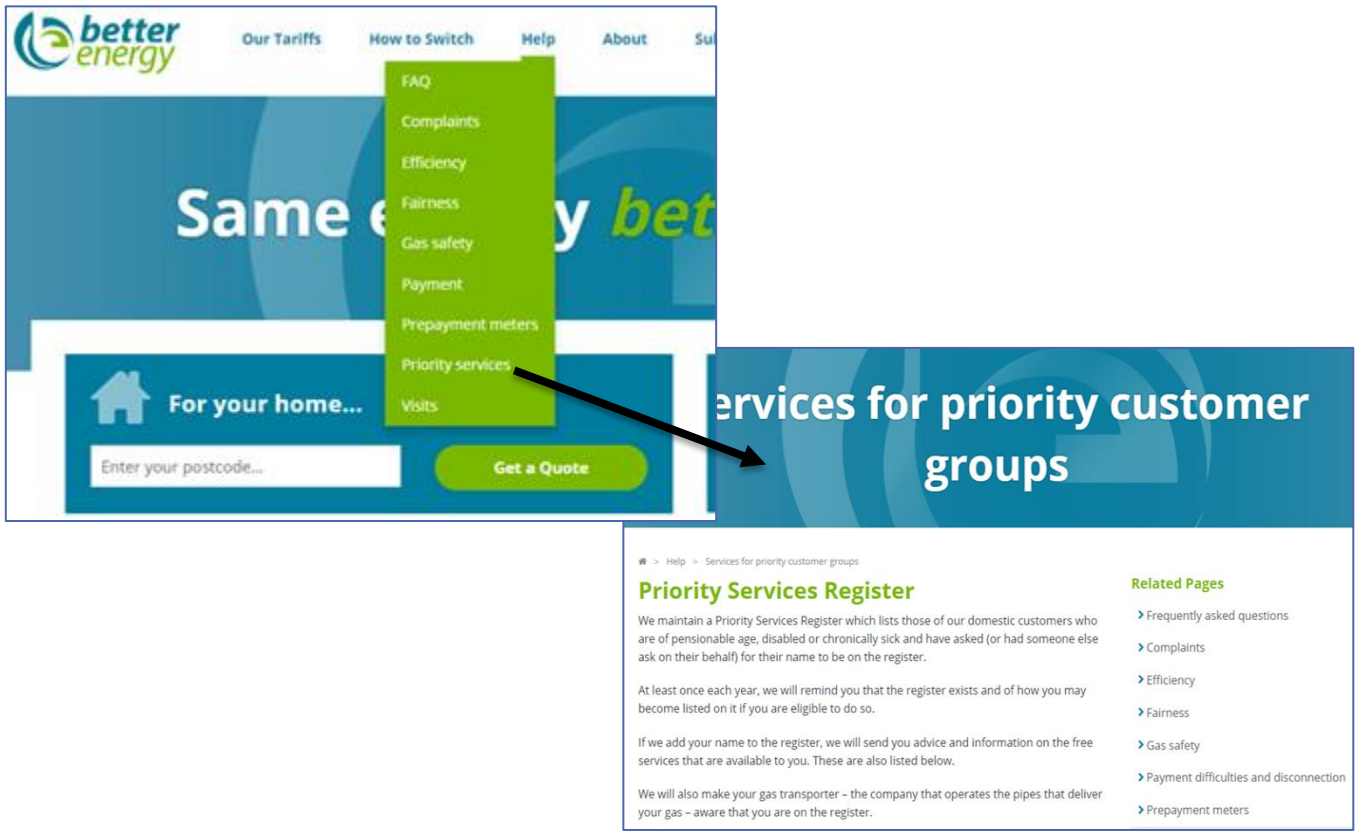
In cases where the information was more difficult to find – which spanned both the regulated and other sectors – this was often because there was no obvious signposting and it was necessary to use a search engine to retrieve it. Further, as noted earlier, three energy suppliers provided no information at all on their websites about additional support and were unable to provide any further information when telephoned (either because they operated an answer message service and did not return the call, or because the individual reached was unable to provide the information).

Once located, for the most part information on additional support services and registers was presented fairly clearly: typically the webpage gave a brief description of the services that were available and to whom; and described the register (where available), as well as providing a phone number and/or email address that consumers could use to obtain further information. A small number of organisations presented information using BSL videos, as in the example shown below. However, the review did not identify any obvious instances of information being presented in other languages.

Image 2.7: Example of BSL communication from SGN website[19]

Just over half of the organisations whose provision was reviewed (22) included within their respective websites signposting to other organisations that provided additional support. In the energy sector, this included signposting to similar support services provided by Scottish Water; for example:

> *"You may be able to register for help from other utility companies. For example, water suppliers may offer similar services to ours. Contact your water supplier and ask them about any extra help and support they can give you."*

> *Extract from SSE website*

> *"Please be aware, your water supplier might also have this type of register. For more information, please contact them directly"*

> *Extract from Utilita website*

Similarly, the Scottish Water website signposted consumers to other utilities companies that provided additional support, mentioning energy suppliers, the two electricity distribution network operators and SGN.

In addition to this cross-sectoral signposting, several organisations signposted consumers to wider support services for people in vulnerable situations, including Citizens Advice Scotland, Action on Hearing Loss, Age UK, Disability Rights and Macmillan.

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[19] While SGN does not have its own Priority Services Register, it provides information about the PSR on its website, and encourages customers who need it to contact their energy supplier directly.

Industry and stakeholder perspectives on current provision

The qualitative interviews with industry representatives and other stakeholders provided for a fuller understanding of current additional support provision for consumers in the regulated industries and beyond – including ways in which different industries conceived of vulnerability, the nature of support they provided and challenges they had encountered in this regard.

Conceptions of vulnerability and the nature of available support services

Stakeholders representing the regulated industries deliberately tended to use a very "broad" and/or "fluid" definition of vulnerability, focused around particular challenging circumstances in which consumers might find themselves, whether on a permanent or interim basis, rather than around particular groups of people. This very much appeared to be a response to emergent regulatory and governmental definitions of vulnerability; not least those set out in Ofgem's Standard Licence Conditions, which due to cross-sectoral work facilitated by organisations such as UKRN have had an influence both within the energy sector and beyond.

> *"We follow the definition provided to us from Ofgem, which doesn't actually focus on people... it's more on situations...You or me could become vulnerable at times in our lives, so it can be transient as well. It is making sure that we understand and have the ability to recognise, and, where appropriate, record those situations."*
>
> Energy sector representative

> *"It's not a fixed state that someone is vulnerable, and then they are vulnerable for life, and it's [not] necessarily...purely about disability and the elderly. It is a more inclusive definition of vulnerability, but, in particular, it is one where we recognise the customers move in and out of vulnerability, and different levels of vulnerability as well."*
>
> Water sector representative

> *"Vulnerable consumer in our view is a very broad definition. It may be a person who has disabilities of any description, it may be the elderly, it could even be single parents for whom life can be quite tough making ends meet".*
>
> Postal sector representative

To the extent that *specific types* of vulnerable situations were mentioned in the interviews, stakeholders invariably cited all of those covered in Figure 2.1, above. At the same time, several volunteered that a particular focus for them at present was ensuring they were appropriately catering for consumers with mental health problems or conditions, including dementia, as this was an area where provision had been weaker in the past. Several providers described having enhanced their training offer, or being in the process of doing so, to ensure frontline staff were better able to recognise when a customer might be suffering from a mental health problem and to tailor their approach accordingly; for example, by giving the customer extra time to process information. Scottish Water has developed a training course to raise awareness of customers in vulnerable circumstances, with specific focus on Dementia Awareness initially, which is being rolled out across the Customer Service teams. Another stakeholder referenced similar training his organisation was considering to facilitate employees' interaction with consumers with learning disabilities.

"We worked with the Care Commission to train our frontline staff on dementia awareness. We've moved to Alzheimer's UK and are working with them to become a 'Dementia Friends' organisation.... We're also using trainers from Mind to train our customer experience team on how to deal with people that have potential mental health issues...The next step on that is to adapt that training for frontline engineers; so taking it from dementia to other mental health issues."

Network operator representative

"What we are looking at, there's a scheme in Northern Ireland at the moment called 'Just a Minute' which is basic training [on interacting with] those who have disabilities that aren't obvious [so that] they are given the time they need to make their requests without being pushed or talked over."

Postal sector representative

More generally energy representatives provided examples of steps they had taken to train staff on how to identify consumers who may be in a vulnerable situation through their customer interactions. For example, one company described how their staff are encouraged to listen out for the sound of children in the background and ask the customer if they would benefit from any of the services they offered to parents of young children. Similarly, another spoke of encouraging their staff to use active listening and active questioning, so that they could identify potential needs, in cases where the customer had not volunteered this information directly.

"We train our people to recognise vulnerability when they have an interaction with a customer, and then to record it and respond to that vulnerability. We do not allow people to ask about vulnerability on every call...because if they are not vulnerable, or they don't want to talk about it, asking them every time is going to annoy them. So we train them to use active listening and active questioning."

Energy sector representative

Stakeholders from *outwith* the regulated industries described using very similar definitions of vulnerability to those described above. The emergency services tended to have a particular focus on people based on the level of risk that people may pose to themselves or to others, making specific reference to those who were in crisis or who had chaotic lifestyles; for example, those with alcohol or substance misuse problems, and those who had recently been released from prison. A stakeholder from the Scottish Government pointed out that it did not take much for a person to slip into a crisis or chaotic situation; and that this needed to be borne in mind by all types of service providers when they were designing support services.

Though almost all of the stakeholders interviewed repeatedly used the terms vulnerable or vulnerability when discussing their additional support services, one was keen to stress that they deliberately did not use these terms in any customer-facing communications – both because people in vulnerable situations did not always consider themselves as such, and to avoid the risk of any associated stigma.

"The wording that we use doesn't even actually involve vulnerable, vulnerability, vulnerable situations, or anything like that. We just promote the services; we just [say] something along

the lines of, 'we have got a number of ways that we can adapt our services based on your
circumstances. Do you think you [would] benefit from any of the following...?' It's not about
pigeonholing people it's about saying, here is all the good things we could do, let us know if
you could benefit from them."

Energy sector representative

In describing the nature of the additional support they provided to consumers in vulnerable situations, energy industry representatives tended to say that their focus was on identifying individuals' specific circumstances and needs, and adapting to these, rather than on offering a very standard suite of options. This "customer-centred" approach, like the industry's working definition of vulnerability, had been heavily influenced by Ofgem and its guaranteed standards of service. An Ofgem representative interviewed described how the standards favoured a mixed prescription-based and principles-based approach, with the emphasis on the latter, in order to create an "innovative space" in which suppliers could identify and develop support services that best met the specific needs of their customers. Representatives from the water and postal sectors similarly described being committed to pursuing a very customer-centric approach to the provision of support (and indeed other) services. However, it was clear that they were some way behind the energy sector in this regard. This appeared to reflect the fact that they had faced less regulatory pressure (albeit they were subject to some of the same statutory provisions as the energy sector, such the Disability Discrimination Act). It also reflected the very different nature of their interactions with consumers – which, for the most part, were limited to one-off, or a series of one-off, transactions, such that they had had less impetus to learn about different individuals' needs and record this information. Scottish Water, for example, does not carry out financial transactions with its consumers as standard, as water and sewerage services are paid for alongside Council Tax. It therefore does not hold details of all its consumers; only those who made contact with the organisation to make a query or raise a complaint.

Still there was a clear sense that the water and postal sectors were conscious of the need to ensure people in vulnerable situations were appropriately catered for. Water industry representatives described how they were looking to become "more intelligent" with regards to categorising such consumers and using that information to tailor support more rather than pursuing a "one-size-fits-all approach". A Post Office representative meanwhile described the company's "unique selling point" as face-to-face personal contact, tailored to local and individual circumstances. Notably he also pointed out that some of the most important services provided in post offices took the form of informal support for people in need – for example help with form filling – based on postmasters knowing their customers very well.

Priority service registers

As described earlier in this chapter, processes for obtaining access to non-financial support services varied between sectors. Energy suppliers, and the two electricity network operators, had Priority Services Registers; while Scottish Water had an Additional Support Register. The postal sector had no equivalent, reflecting the nature of its interactions with consumers, though it did offer means by which customers could request any additional support they might need.

In terms of other industries, an OFCOM representative noted that the telecommunications sector takes a different approach from the energy and water sectors to classifying consumers who may require additional support. Rather than keeping a single register on which all such consumers are held, they have separate databases of customers based around specific needs, such as the need for large print or Braille communications, or the need for communications to be sent to a nominated person. For organisations working in the emergency services, although they did not have customer-facing vulnerability registers, they did have systems in place for recording details of those in vulnerable situations. The Police Scotland representative interviewed noted that it had a 'vulnerable persons' database, used to record details of individuals

they had encountered in the course of their work and about whom they had had cause to be concerned. This included people in crisis or chaotic situations, those with alcohol or substance misuse issues, people who had been victims of domestic abuse, child abuse, hate crime and other types of personal offences, and people with conditions such as dementia. Typically, frontline staff would add to the database by raising a 'concern report', that was then reviewed, before the relevant details were incorporated into the database. The database was regularly reviewed in order to identify whether there was a legal basis to share any of the information with partner agencies. The Scottish Fire and Rescue Service representative also noted that it holds a record of all Home Fire Safety Visits carried out. This includes information on the visit itself, actions taken, and also who staff regard to be at high risk from fire, and why, including indicators of vulnerability, such as living alone, mobility problems, alcohol or drug dependency, or smoking. The database is used to ensure revisits are arranged, and carried out, for those considered to be high risk.

Energy companies and Scottish Water regarded their PSRs as an important resource, helping to make them aware of the needs of vulnerable consumers and thereby ensure those needs are met. The SGN representative, meanwhile, spoke of the challenges of *not* having their own registers and being reliant on energy companies sharing information with them. These include the fact that the companies could only reveal to them that 'someone' in a particular building was on the PSR as, opposed to being able to share that person's name and address. One network representative contended spontaneously that there should be a single database of consumers in vulnerable situations to which all suppliers had access.

A further challenge, cited by an energy representative, was that not all consumers who may be in a vulnerable situation fit with the eligibility criteria that are used for the PSR. In particular, it was noted that financial hardship is not considered a qualifying category for their PSR. In these instances, if it was clear that a consumer was in financial hardship, the company would take steps to discuss what potential support might be available to them, and offer them such support, but they would not automatically be included on the PSR. Providers took varying approaches to informing consumers about their registers and additional support services more generally. Energy companies typically said that, in addition to providing information on their websites, they routinely told new consumers about the services when they were setting up their accounts. Some also said that other frontline staff, such as meter readers and engineers, were encouraged to mention the services when visiting people's homes, in cases where it seemed appropriate to do so. The water and postal sectors faced somewhat greater challenges in communicating their support services to consumers given they generally had less, and a very different type of, contact with them. Still, water representatives, in particular, highlighted strategies the industry was pursuing to try to overcome this challenge, as is described more fully below.

In terms of what suppliers said to consumers about registers, a notable finding was that one deliberately avoided using the term Priority Services Registers or similar, as they felt this was meaningless to people and may ultimately contribute to low uptake. Instead, their approach was first to ask people about their needs and establish what support services would be most useful to them, before telling them about the register and obtaining their consent to be added to it.

> *"If the customer gives us information during the phone call, if there is what we described as a 'trigger', we would expect our employees to follow that up in terms of establishing what is the situation? Would they like us to register them on our priority services register? "*

> Energy sector representative

Uptake of support services and registration

Stakeholders generally reported that uptake of additional support services and, where available, priority service registration, had increased in recent years, and especially so over the last year. Indeed, the Ofgem representative interviewed commented that registration was at its highest since monitoring began in 2006, which mirrors findings from its latest report on vulnerability which highlighted that the number of free services provided to electricity and gas customers was also at its highest level[20] In that report, it was noted that in Scotland in 2017 there were approximately 485,000 electricity customers and 375,000 gas customers on a Priority Services Register (see Table 2.2). This represents an increase on the previous year of 40% for electricity and 37% for gas, in comparison with increases of 36% and 30% respectively in Great Britain overall.

Table 2.2: Number of electricity and gas customers on Priority Services Registers (2014 to 2017)[21]

Number of electricity customers on a PSR				
	2014	2015	2016	2017
Scotland	232, 646	273,627	345,599	485,582
GB	2,922, 152	3,604,599	4,375,612	5,969,532
Number of gas customers on a PSR				
	2014	2015	2016	2017
Scotland	164,779	212,690	273,534	374,629
GB	2,293,109	2,985,188	3,663,464	4,758, 524

There was a consensus that improved uptake reflected a confluence of two main factors: growing general awareness of vulnerability and vulnerable situations; and pressure from regulators and other bodies such as the Scottish Government and Citizens Advice Scotland. Energy stakeholders also specifically referenced the impact of Ofgem's revised definition of vulnerability, which, they noted, effectively meant that a much wider range of consumers than previously were now identified as potentially eligible for additional support. It is also worth noting that one of Ofgem's revised licence conditions[22] requires suppliers to "take all reasonable steps to identify eligible consumers during the course of their interactions with them", though this was not specifically referenced by stakeholders.

However, the interviews also underscored variation in the overall level of uptake between sectors. Scottish Water noted that the number of people on its Additional Support Register, at around 2,000 consumers, was much lower than the numbers on the Priority Services Registers held by the larger energy companies in Scotland (as shown above, approximately 485,000 electricity customers are on a Priority Services Register in Scotland, although it is worth noting that Scottish Water's customer base is slightly lower than that for electricity, as 3.6% of water customers have a private water supply). Scottish Water suggested that this lower level of uptake was linked to the fact that it does not hold a database of consumers, for the reasons noted earlier, therefore identification of eligible consumers is largely dependent on those

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[20] Ofgem, 2018. *Vulnerable consumers in the energy market.* Available at:
https://www.ofgem.gov.uk/system/files/docs/2018/06/ofgem_vulnerability_report_2018.pdf

[21] Ofgem (2014 to 2017) *Domestic suppliers social obligations,* Available at: https://www.ofgem.gov.uk/about-us/how-we-work/working-consumers/protecting-and-empowering-consumers-vulnerable-situations/consumer-vulnerability-strategy/consumer-vulnerability-strategy-social-obligations-reporting-sor

[22] https://www.ofgem.gov.uk/system/files/docs/2016/06/priority_services_register_statutory_consultation_and_proposals.pdf

individuals proactively contacting the company, which typically happens as a result of the consumer experiencing a supply interruption or having a query about their supply.

There was a consensus that more needed to be done to increase uptake of registers and of services generally and, specifically, that there was a need for a more "proactive rather than reactive" approach on the part of providers to ensure support services were sufficiently "visible" to consumers[23]. A challenge facing providers in this regard, however, was they had no *a priori* way of knowing how many and which consumers might be eligible for additional support, apart from directly checking in with consumers themselves – and even then there were difficulties as vulnerabilities were not necessarily 'in plain sight', and, as noted earlier, people in vulnerable situations did not always consider themselves as such.

> *"A lot of vulnerability, sometimes you need to see it, or actually have more than one conversation with the customer…You can have one conversation with a person with dementia [and] you might not actually see that there is anything [wrong] or become aware of any kind of triggers, that might make you think that there is something there that we can support. But, if you had a repeat conversation and you started to notice differences or forgetfulness around information that you previously provided, you then start building that picture up."*

> Energy sector representative

> *"There is a proportion of customers that just don't contact us, so our most difficult group are those that rarely make contact and are very minimal with what information they share with us."*

> Energy sector representative

Energy industry representatives reported having taken a number of steps to try to get around these challenges and generally increase uptake of their support services; in particular, including relevant information in as many of their communications as possible – for example their websites, bills and other written correspondence – and training frontline staff to "address vulnerability and bring it proactively into the conversation". A few described how they were also increasingly making efforts to get out into the community to inform people about support services; including visiting or leaving information materials in places that people in vulnerable situations might frequent, such as food banks and health services, though these approaches were still very much in their infancy. Others described working in partnership with third-sector organisations that directly engaged with people in vulnerable situations, such as those with health conditions, those over pensionable age, and those in financial hardship.

> *"I think there has been an appetite to try and open up the PSR visibility … I'm not saying [our process] is the best but it's looking at education and making people aware of what they can get and why they need it maybe…. There becomes the importance of having different channels of communication."*

> Energy sector representative

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[23] This issue is not unique to organisations operating in Scotland; the Utility Regulator in Northern Ireland recently carried out a review of Care Registers in the energy and water sectors (the equivalent of Priority Service Registers) and noted that more needed to be done to improve promotion and awareness of the existence of registers and the support services available. See https://www.uregni.gov.uk/sites/uregni/files/media-files/Care%20Register%20Review%20Final%20Decisions%20.pdf

"One thing I think we could do more of is…going out and trying to make sure [customers] are aware of it and the help we offer, and once we know that they are aware then it's up to them whether they want that support or not…One of the things that I liked…I think it might have been in the water sector … was [the service provider] sent staff to food banks and doctors' surgeries and had conversations with people about whether they were struggling to pay."

Energy sector representative

"[We work with] Macmillan, because people may have diagnosis in their family but are not aware or expect the energy company to provide some services. So, if Macmillan are speaking to somebody, with the customer's permission they will then contact us. We will then go back to the customer and offer our range of support to the customer. "

Energy sector representative

Scottish Water similarly reported making increased efforts to communicate more effectively about their additional support services, including by making better use of their existing corporate communication channels; providing relevant training for their staff; and working in partnership with other utility providers. They also reported that they were using a new Customer Relationship Management system which would help to ensure they have easy to access information on customers, their needs and their communication channel preferences to allow easy and proactive updates.

"We are increasingly managing a programme of proactive messages to customers through social media. In addition, we are benchmarking the services provided by other utilities in Scotland and looking at partnership opportunities to allow us to increase our capabilities in delivering for customers. We jointly attended the Independent Living event last year and will attend again in 2018 to connect with customers and promote our Register and services.

"We do not currently offer a referral service, to third-party organisations, and that's something else that we are looking at. We're trying to scope out the most appropriate ones ,that will meet our customers' needs."

Water sector representative

The potential role of third-party organisations in helping to improve support service provision was similarly highlighted by a Scottish Government interviewee. This person contended that there was scope for the regulated industries to work more closely with the voluntary and third sectors – and specifically, health and social care partnerships – with the aim of enhancing the support that is available, and ensuring it is adequately tailored to individuals' needs.

Beyond awareness-raising, and in terms of registration *processes,* industry stakeholders generally felt these worked well and were not particularly in need of improvement. However, they and other stakeholders did highlight the importance of updating registers regularly to ensure these reflected consumers' evolving circumstances and support needs. However, there were some references to challenges involved in this; not least the fact that people can be difficult to track down, whether because they have moved house, gone into care or such like.

"The difficulty for us is that of course people move house, they die, they go into care. So, we might not find that out through our partner agencies, necessarily, because they won't know that we're holding records on Mrs Smith of One High Street, if Mrs Smith happens to die or get put into a care home or move."

Energy sector representative

"It's not just a case of once we have that initial conversation we then leave the customer and never revisit it, because they might actually no longer need support from us, or, unfortunately, some circumstances can get worse. So, we revisit it on those interactions with customers not just on the first time, but, if they call us back in six months' time because they want to make a payment or they want to arrange for an appointment for their meter or anything like that, it's always there...We actually do it as well now in all of our sales calls...if the customer phones up to buy a new product or service it's embedded into every single one of those conversations."

Energy sector representative

Quality, appropriateness and adequacy of additional support services

Industry stakeholders for the most part spoke in very positive terms about the additional support services they delivered. A few were keen to reference newer services they had developed recently, or to highlight positive stakeholder and/or customer feedback. However, it was notable that not all providers were collecting relevant customer feedback that might enable them to make a truly informed assessment of the extent to which services were meeting customer needs.

"We introduced a locking cooker valves service about three years ago now, and it's supported by Alzheimer's, Scottish Government, all the MSPs have got it on their website, for instance, on their Facebook page... We piloted it and trialled it...and it's now a free service to everybody in the UK."

Network operator representative

"Fortunately, we get some really good feedback so it kind of validates any hard work that we might have put in to make a change or make or adapt a product or a service."

Energy sector representative

"We measure satisfaction of all customers with the services that we provide, at this stage, however, that data is not segmented to vulnerable circumstances level."

Water sector representative

Non-industry stakeholders were more qualified in their comments about support service quality, saying either that there was a lack of evidence to enable them to comment on it in an informed way or, as in the case of the Scottish Government official cited above, that more could be done to tailor services to individual consumers.

The role of regulators

Stakeholders were asked for their perspective on the role that regulators played, in the context of non-financial support for consumers in vulnerable situations. Among the energy companies that took part in the interviews, the dominant message was that regulation had made a positive impact on the provision of support for consumers in vulnerable situations. As noted earlier, energy representatives spoke of following Ofgem's guidance on categories of vulnerability, and that the widening of these categories had resulted in a much wider range of consumers than previously being identified as potentially eligible for additional support.

> *"Changes that Ofgem have made, through giving a broader view on what vulnerability is, making that more well-known and obviously implementing it through supplier conditions …these [changes] subsequently resulted in the increase in uptake."*

> Energy sector representative

In addition, energy representatives felt that Ofgem played an important ongoing role in terms of providing scrutiny and oversight of what companies did, and that such a role was necessary to ensure that organisations were operating to a consistent standard.

> *"I think the regulator is pretty demanding in the area of vulnerable customers, and I would only expect that to probably increase …there are regular requests for information, around information for how we deal with our vulnerable customers. But, I think [that system] works well",*

> Energy sector representative

> *"It's not just a case of if something goes wrong we then need to kind of tell them about it, or if we have done something good they would be interested in listening. There is quite a lot of rigour around this that regardless of what is happening, we will formally submit that once a quarter and it's very likely that we would probably sit down with Ofgem and discuss that at least once a year as well."*

> Energy sector representative

Scottish Water representatives, on the other hand, noted that the water sector in Scotland is subject to much less scrutiny than the energy sector. It was noted that much of the scrutiny of what they do in terms of customer service is driven from within the organisation, rather than from the regulator. At the same time, Scottish Water representatives questioned whether or not the absence of scrutiny had had any impact on the standards of service that they provided customers.

3. Consumer awareness and experiences of support provision in the regulated industries

Awareness of non-financial support services

The consumers who took part in the focus groups and in-depth interviews were asked, unprompted, whether they were aware of any non-financial support services available in the regulated industries. Generally, they were not able to identify any such services unless they had actually used them or knew someone who had (as is discussed more fully below). To provide a further check on awareness, therefore, and to stimulate further discussion, they were presented (either aurally or visually) with a list of various non-financial support services for which they were eligible, and asked whether or not they were aware of each. The services are shown in Figure 3.1 below.

Figure 3.1: Examples of additional support services for consumers in vulnerable situations

For all consumers in vulnerable situations	Advance warning of interruptions to the energy or water supply, so that people can plan ahead, for example if they have specific medical needs
	Priority help in the event of an emergency, for example priority bottled water or alternative heating facilities in the event of a supply interruption
	Doorstep identification schemes, where someone calling at the house uses an agreed password so that you know that they are not a bogus caller
	Free annual gas safety checks
	Informal support in post offices
For the visually impaired	Bills or other communications in large print, Braille, or audio formats
	Bills or other communications sent to someone that might be better placed to manage them, such as a family member or carer
For the hearing impaired	Bills or other communications via instant messenger, textphone or minicom
	Bills or other communications sent to someone that might be better placed to manage them, such as a family member or carer
For those who have English as a second language	Interpreters
	Bills or other communications sent to someone that might be better placed to manage them, such as a family member or carer
For older people and those with physical disabilities	Meter relocation if it is difficult to move or read
	Bills or other communications sent to someone that might be better placed to manage them, such as a family member or carer

Participants were commonly aware, or at least assumed the existence, of advance warnings about interruptions to water and power supplies, and priority help in the event of an emergency. Further, all of those with visual impairments were aware of the availability of energy bills or other essential service communications in large print, Braille, or audio formats.

On the other hand, comparatively few participants were aware of other types of support, including doorstep identification schemes, free annual gas safety checks, meter relocation options and nominated persons schemes. Further, none of those with hearing impairments were aware of alternative forms of communications available to them (such as instant messaging, textphone or minicom) and no participants with English as a second language were aware of the existence of interpreters. More generally, no participants were aware of *any* form of additional support available in the postal sector,

whether in the form of informal support from postmasters or more formal provision such as wheelchair access within post office branches.

These findings also echoed the results of recent research by Citizens Advice[24] among those with mental health conditions, which found that most of these clients were unaware they could get support from their essential services providers, and that even when they know support exists, they struggle to access it.

To some extent, varying awareness of different support services reflected the relative necessity of the services to the participants. People with visual impairments tended to be aware of provision available to them because they would struggle to get by without it and, relatedly, because they were used to seeking out such support from their service providers. Similarly, people with chronic conditions such as kidney disease and sleep apnoea who were reliant on machine support were generally aware of provision in respect of supply interruptions because the potential consequences of such interruption were so serious for them.

> *"My husband suffers from sleep apnoea and sleeps with a mask on tied up to a machine…. It does concern me if the electricity went off in the night [because we'd have no] back-up or battery system."*
>
> Registered female, elderly

In contrast, participants with hearing impairments and those for whom English was a second language had generally encountered few difficulties engaging with their service providers so had not needed to find out about additional provision for which they were eligible. Similarly, low awareness of support in the postal sector appeared to reflect the fact that participants either did not personally make much use of postal services, or the fact that they had not experienced any problems doing so.

Varying awareness of support services between individuals also appeared to reflect the extent to, and manner in, which these services were typically promoted by providers. Reflecting the comments made by stakeholders interviewed, participants who were aware of services had generally been told about them by their provider when setting up an account, or when their provider visited their home for another purpose – for example to fit a meter or respond to a supply interruption. Participants who had had no such interaction with their providers (as well as some of those who had) were comparatively uninformed about available support services, unless they knew someone else who had benefitted from these.

> *"I moved from Scottish Power to Scottish Gas, they made me aware of everything that was available for disabled people. I think at that point I was getting kidney ops every six weeks and they got my meter read more often, so I wasn't having to bend down and open the thing…Every bit of advice possible they gave me."*
>
> Registered female with a disability and chronic condition

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[24] https://www.citizensadvice.org.uk/about-us/policy/policy-research-topics/consumer-policy-research/consumer-policy-research/beyond-good-practice-guides-improving-support-with-essential-services-for-people-with-mental-health-problems/

"…My electricity meter is away at the back of a cupboard, very low down, difficult to get at. So, I can now ask for them to come and there is no extra charge for them to come and read the meter…but that only came out because there was a power cut and I then found out that all these services were available."

Registered female with a disability

"It was by sheer chance…we were told [by letter] that the electricity was going to be off one morning. On that [it] said if you were a pensioner [you can] register to get priority in an [electricity] cut-off situation…But that is the only time I have ever seen any reference to it."

Registered female, elderly

Following on from such comments, it was common for participants to suggest spontaneously that providers ought to do more to bring support services proactively to the attention of consumers, otherwise consumers may never know about provision from which they could potentially benefit.

"In the days gone by…your doctor followed all those bits and pieces for you. But, now you go to the doctor and if you get ten minutes you're very lucky, so where do you go? Who organises this now, because it seems to me as if the councils can't do it because of lack of funds. "

Male focus group participant

"They're not forthcoming with [information]. I think that schemes like that should be advertised, and people made aware that are entitled to it, by all means necessary – advertising, post, internet. A lot of things you have to find out for yourself, which to me is wrong."

Registered female with a disability

On being informed of the range of support services that existed, most participants recognised, or at least surmised, that they would be eligible for advance warnings about supply interruptions and priority help in an emergency – though this was often because they believed these services were provided to all consumers, not just those in vulnerable situations.

"Everybody uses their water to go to the toilet, to drink, to wash…you feel like you've got your arm chopped off when you've not got it."

Registered female with a disability

"We're no different to anybody else. If, you know, your power is going to be off for half a day you can sort of just be a bit careful and maybe get other forms of heating going or something."

Unregistered male, elderly

However, participants generally underestimated their eligibility for the other support services. This was especially the case with respect to free annual gas safety checks, nominated person schemes and meter relocation – the only participants who knew they were eligible for these were those who had actually used them or who knew someone who had. Parents of young children were among those least aware of their eligibility for additional support services. Indeed, none of the parents interviewed realised they were eligible for *any* of the specific services listed above.

Awareness of priority registers

Reflecting the findings reported above, awareness of priority services registers was very mixed, with as many participants unaware as aware of them – and those aware were, for the most part, only aware of priority services registers in the energy sector, not Scottish Water's Additional Support Register. Notably, there was not always a direct overlap between awareness of support services and awareness of registers: several participants who were in receipt of services were unaware of registers. That said, consumers who were particularly reliant on support services – those with visual impairments and particular chronic conditions – tended to know about registers.

Generally, participants had become aware of registers in the same ways as they had become aware of individual support services: they were told about them by their providers when setting up an account, or during some other form of interaction with their provider – though there was evidence of inconsistent practice between providers in this regard. Less commonly, they had found out about registers by word of mouth or by proactively seeking out the information.

> *"[I became aware of the register] when I moved into my new house and there was a letter from Scottish Power. I phoned them up to ask, could I have Scottish Power and they asked did I have any health issues? I said, yes. They said right, we have a priority service; if anything goes wrong, just phone us and we will be there within four hours."*
>
> Female focus group participant

> *"The electricity board told me nothing [about registers], the gas board told me everything."*
>
> Female focus group participant

> *"I have heard [of priority service registers] but only in terms of some friends I have who are both quite physically disabled... I knew they were on a register with their electricity company."*
>
> Unregistered, male with a mental health condition

> *"I read it on their information [Scottish Power] put out online."*
>
> Registered female with a disability

For their part, participants who were unaware of registers (prior to taking part in the research) expressed surprise, and in some cases annoyance, that their providers had not brought these to their attention.

> *"I never heard of this before and I'm kind of surprised that, having moved, three years ago, I wasn't made aware of this."*
>
> Male focus group participant

> *"First of all, I didn't know they had all these services. Second, I find out I am entitled to them, and third, [I've] got to register with them...If you don't know where they are, how are you going to register? It's absolutely shocking."*
>
> Male focus group participant

Participants reiterated their calls for more proactive awareness-raising about provision on the part of suppliers. Specific suggestions made in in this regard were very much in line with those being pursued, or suggested, by the stakeholders interviewed, and included the provision of information in relevant community-based locations. There was specific mention of GP surgeries and other health services which participants felt were particularly well placed to support awareness-raising because they were respected and trusted in the community and had a high level of contact with people in vulnerable situations.

> *"If a doctor said 'You're no well, this is [the support] you can get'. One email could sort all this out if doctors sent it, one email... [They] can say 'This person needs help, it's been certified by the doctor'."*
>
> Unregistered male with a disability

Still, consumers also called for more direct communication with relevant households, for example, via bills or annual statements, as well as national TV and radio advertising campaigns.

> *"It's easy to add [to a bill] these services that are available...[an] additional bit of information in case you need it and [who to] contact, you know, either email or a phone number or something;."*
>
> Female focus group participant

> *"I think that schemes like that should be advertised and people made aware of it that are entitled to it. By all means necessary, advertising, post, internet. A lot of things you have to find out for yourself, which to me is wrong."*
>
> Male focus group participant

Experiences and perception of registers and registration

Reflecting the mixed level of awareness of priority services registers noted earlier, around half of interviewees and focus group participants said they had gone through the process of registering for non-financial support. It should be noted, however, that a few of the consumers interviewed thought they might be on a register, but were unsure how this might have come about, or, indeed, whether or not it was definitely the case.

Of those who had definitely registered for additional support, all had done so with an energy company and none with Scottish Water. In most cases they had registered with their energy supplier, rather than with their Distribution Network Operator (DNO), though participants were not always clear on the distinction between the two, and were therefore not always clear with which they had registered.

Participants in certain vulnerable situations were more likely than others to be on a register; namely, those with physical disabilities, chronic conditions or long-term illness; people over pensionable age; and those with a visual impairment. Only one participant with young children had registered for additional support. In terms of other characteristics that may impact on registration, there were no discernible patterns by location (urban or rural), income level, or internet usage.

Perceptions of registers among those who were on them were generally positive. Registers were seen as a vital resource that made it easier for those in vulnerable situations to access essential services. Indeed, participants felt that the

additional support they had received as a result of registering was superior to comparable support they had received from their councils, which was generally felt to be lacking.

> *"I feel it is a very good thing...for people who weren't able to do things for themselves and would be left alone, they won't feel completely cut off... I'm sure anybody would feel the benefit of registering."*
>
> Registered female with a physical disability

> *"I'm quite impressed that a company actually offers it – to me [it] means that things are moving on and people can make things more accessible should they choose to."*
>
> Registered female with a visual impairment

> *"In winter, if you have frozen pipes or if anything happens with your boiler, the council just don't care if you have kids or what you have. Even with a newborn in the house, you just have to wait your turn...whereas with the energy supplier, they will be out within three hours."*
>
> Registered female with a chronic condition and young children

Participants spoke in particularly positive terms about the option of priority help in the event of an emergency or supply interruption – as noted previously, a number had conditions that meant they were very reliant on machine support, or on their heating.

> *"I need help when the electricity goes off...if I'm on my {ventilator} machine, I need power and if I couldn't use power it's a crisis situation."*
>
> Male focus group participant

> *"Me and my son needed the electric the gas, as I've got arthritis and my son he needs the heat because he has got a type of arthritis... so it's most important for [us] to not get the heating and electric cut off."*
>
> Registered female with physical disability

In terms of the *process* of registering for such services, the dominant view among those with experience of it was that it was quick and straightforward. Indeed, nobody identified any specific issues or problems with it. All of those who had registered had done so by telephone, either at the point of opening an account with a new supplier or, less commonly, after having proactively sought out information on the support services their supplier offered. As indicated earlier, consumers with a visual impairment or specific communication requirements, were the most likely to have proactively sought out information as additional support services were so vital to them.

> *"I just phoned them up and said 'in future would it be possible to get my things on audio?' and they went 'not a problem'. It was done right away."*
>
> Registered female with a visual impairment

"It was easy enough; you just phone up and give your name, your information and that's it."

Registered female with a physical disability

Consumers' comments on the registration process often revealed much about their views and feelings in respect to vulnerability as a concept. On the whole, and as illustrated above, registration made consumers feel supported and reassured that they would receive help they needed. However, a small number of participants noted that, prior to registering, they had not considered themselves as in need of support but the process, and by implication asking for help, had made them feel more aware of their vulnerability. This appeared to be both a 'blessing and a curse' in the sense that it made people reflect more on their needs but also brought home to them their difficulties.

"I thought it was funny in a sort of way, that although I have the health conditions they listed off, I'm not falling to bits. But it's nice to know it's there."

Female focus group participant

"It made me feel like older than I am. I still feel young inside, but to have all these things in place it just feels like I'm advancing in my years."

Registered female with a physical disability

Those who were unsure as to whether or not they were on a register and/or how their registration might have come about were, by definition, unable to comment on the process. However, they did sometimes expand on the reasons for their confusion. For example, one participant described receiving a letter saying she was on her energy supplier's register, but having no recollection of registering. She thought that her GP surgery may have arranged registration on her behalf. Another participant had received a leaflet from Scottish Power informing her about special support for which she was eligible, which had led her to think she was on the register. She assumed this might have come about as a result of a visit Housing Association staff had previously made to her home, during which they "made a note" that she was a vulnerable tenant. A small number of other participants had received correspondence from their DNOs, informing them about interruptions to their electricity supply, and were unsure as to whether or not this was an indication that they were on the operator's register.

Only a couple of the registered consumers interviewed had experience of switching suppliers and re-registering. They described this as an easy and straightforward process, that they were able to do by telephone, much like the first time they had registered.

In spite of participants' limited experience of multiple registration, they nonetheless spontaneously raised concern about the need to register with different companies when switching from one supplier to another. They felt it placed undue onus on consumers to inform providers about their support needs and potentially risked their missing out on important services. This risk was seen as particularly significant for people with language or cognitive difficulties that might prevent them from understanding the need to re-register when switching suppliers.

"If your provider went bust tomorrow, and you were given a new supplier straight away, if they didn't have that information and there was suddenly a power cut, that could be very bad news."

Male focus group participant

"Especially people whose first language isn't English, [those with] a mental health condition, or the very elderly, might not understand that they would have to register again."

Male focus group participant

Among those that had never registered for additional support services, the main reason was that they were just not aware of the services, as highlighted earlier in this chapter. Another reason was that they did not consider themselves in need of additional support – either because they had everything they felt they required from their suppliers and had had no problems engaging with them; or because they had sufficient, informal support from family members, neighbours or friends. These participants included those with medical conditions (ranging from a pacemaker to a visual impairment) and those over pensionable age and a parent of young children).

"I'm an independent person. If I really needed something then I would enquire and see how I would go about it kind of thing."

Unregistered male over pensionable age

"Fortunately, I've still got my husband in the house and as long as he's there, and I've got a son and a daughter who call in, I can always ask them (for help)."

Unregistered female with a visual impairment

Use and perceptions of non-financial support services

Whether or not they were on a register, participants were asked about their usage of support services for which they were eligible (see Figure 3.1.). Overall, usage was low, even among some of those who were on a register.

Of the services participants had used, all were services offered by energy companies and included: advance warning of supply interruptions; priority support in the event of an emergency; and free gas safety checks. Each of these services tended to have been used mostly by those with a chronic condition, those with a physical disability, and people over pensionable age. Participants with a visual impairment had made use of adapted communication (including Braille and audio correspondence) and doorstep identification schemes.

A small number of participants also cited examples of 'informal' support they had received from Royal Mail and the Post Office, of the type highlighted by earlier stakeholders. Examples included postal workers making time to speak with them and ask if everything was okay, or ringing their doorbell to make sure they were aware that their post contained important bills; and, in the case of visually impaired participants, Post Office staff helping them to use in-branch services. Visually impaired participants also made reference to the availability of a free collection and postage service for materials they received from the Royal National Institute of Blind People (RNIB), such as Braille books and talking books.

"If you receive Braille books from the RNIB library, these are really big and bulky…Instead of you lugging all these books to the post office, you can make an arrangement for the post office to pick these books up from your home and return them to the RNIB."

Unregistered female with a visual impairment

No participants had used additional support services provided by water companies. A small number had received advance notice of their water being cut off but this was in the context of a blanket communication issued to all affected consumers, not just those in vulnerable situations. One visually impaired participant who had received such a communication noted that she was unable to read it, thereby rendering it useless to her.

"I've never had anything from [Scottish Water]. Our water was switched off once…apparently, there was a note put through your letterbox that it was going to be switched off, but obviously I couldn't read it."

Registered female with a visual impairment

This experience notwithstanding, and as is evident in some of the earlier quotations, perceptions of additional support services among those who had used them were overwhelmingly positive. Participants felt that the services were adequate, appropriate for their needs, and generally of good quality. They made no specific suggestions for additional, or improved, services.

In discussing the quality of support they had received, it was notable that participants placed particular value on basic customer service aspects of the experience. The speed with which services were provided and the regularity of related communications from suppliers received particular mention in this regard.

"When there was bad snow I was getting texts every other day saying there may be a power cut so please phone this number. The communication was there and which was good to know."

Registered female with a chronic condition and mental health condition

"We'd had a power cut and my boiler went out…and somebody was out within about an hour. He placed [raised] stickers on one of the buttons [on the boiler], so that if ever it happened again I would know which button to press."

Registered female with a visual impairment

A further aspect of customer service reference repeatedly mentioned was the quality of staff, who were praised for their knowledgeable approach to providing information, as well as their helpfulness and friendliness.

"They were knowledgeable when I phoned…the people and the communication were very professional and polite."

Registered female with a chronic condition

"They always let us know [about power cuts] in time and ask if there's anything they can do…they do their best for you."

Registered male with a physical disability

Positive feedback on staff extended to the informal support provided by postal workers. Indeed, one participant with a mental health condition had found the social interaction with his postal worker particularly valuable as a means of alleviating his mood.

"If you're not seeing anybody, it is somebody to talk to you. Even that brightens you up for the day, if you know what I mean."

Registered male with a mental health condition

While feedback on the quality of service was overwhelmingly positive, one participant who lived in a remote island community gave a more negative opinion. Having experienced power cuts and supply interruptions, he felt the response to fixing these issues was slow and no different from that received by others in the area, thereby rendering the register "completely ineffective."

Reasons for not using services

Among those that had not used any of the additional support services, the reasons were the same as those given in relation to not registering: For some, it reflected the fact that they were unaware of the existence of services. It was notable that even some of those who were registered commented that they were not aware of the full range of services offered; others that they wished they had known about the services earlier. Still others expressed concern that other people in vulnerable situations might be missing out on vital support services because they did not know about registers.

Another reason for not using services was because they felt they did not need support – either because they did not consider themselves to be in a vulnerable situation, because they had not experienced any difficulties or because they had an informal support network. In particular, among those whose first languages was not English, it was common for participants to say that they had a family member, friend, or member of a support organisation (such as community groups that work with specific nationalities) to whom they can show letters and bills, and have these explained. Essentially, these support networks provided the role of interpreter, removing the need for them to access this from their service providers. Still, some of these participants observed that they may benefit from support services in the future if they find themselves in a more vulnerable situation.

"Yes, I think if I was living on my own I would maybe avail of these services but as long as there's still somebody here in the house with me I'm okay."

Unregistered female with visual impairment

4. Improving the consumer experience

The consumers who took part in the interviews and focus group made a number of spontaneous, unprompted suggestions for improvements to current additional support provision and processes in the regulated industries. As illustrated previously, these often related to the need for greater awareness-raising about the very existence of support services (and of registers specifically), and there was a clear appetite for awareness-raising through community-based groups.

In addition to awareness-raising, it was suggested that organisations could improve the chances of individuals registering by sharing customer details between organisations, such that the consumers would "automatically" be provided with support services they needed.

> *"What I would like to think is, and I'm not sure if this is the case, that [there] is a shared database with other [energy] companies, so if you were switching I would like to think they would already be made aware of that fact that you were disabled."*

> Registered female with a visual impairment

Following these unprompted discussions, participants (both consumers and stakeholders) were asked for their views on two specific hypothetical scenarios of customer data-sharing between sectors or suppliers, and asked for their views on these. The scenarios were as follows:

- *Scenario 1: You are registered with your energy supplier for non-financial support, but not with Scottish Water or Royal Mail. Your current energy supplier passes your name and contact details on to Scottish Water and Royal Mail so that they can provide you with similar types of support.*

- *Scenario 2: You are going to switch from your current energy supplier because you have found a better deal online. When you switch suppliers, your current energy supplier passes details of your registration on to your new energy supplier so that you can be placed on the new supplier's register.*

They were also subsequently asked for their views on the idea of a single register of consumers in vulnerable situations to which all of the regulated industries could gain access:

- *Scenario 3: Instead of having to register for additional support with individual energy, water and post suppliers, you register once with a public body, such as the government, council, NHS or other public body, and they then make your details available to all suppliers but only for the purpose of providing additional support services.*

Attitudes towards data-sharing between providers (scenarios 1 and 2)

The dominant perspective among consumers was that the sharing of priority register data within and between different regulated industries was a good idea in principle, but that certain conditions would need to be fulfilled before it occurred.

Consumers identified a range of potential benefits of the types of data-sharing described in the two scenarios; the main one being that it would help to promote awareness of available support services and, relatedly, see consumers gaining

automatic access to those services for which they were eligible – as opposed to having to seek out services proactively themselves. This was deemed particularly important in the light of low awareness of both support services and registers.

Participants also commented that data-sharing would help obviate the burden on consumers of having to contact multiple organisations to explain their circumstances, request access to services and/or to register. There was a perception that this would be especially valuable for people with mental health issues and chronic conditions, for whom repeat registration would be likely to present a significant barrier to accessing services.

> *"It saves you going through telling all your details again. One company has got it and then if you want to change your supplier, they can pass it on to them."*

> Female focus group participant

> *"I think, if you are ill, if you've got a mental health problem or if you've got long-term illness… if you're struggling at home, the last thing you are thinking about is contacting your supplier – you know, if you're struggling day to day."*

> Male focus group participant

> *"If you take people who are disabled or visually impaired, they have got enough to do just to live. You should register once and that should be the end of it."*

> Male focus group participant

More generally, it was commonly suggested that data-sharing between providers – and particularly between energy suppliers at the point of a customer switching – seemed like an obvious, "common sense" thing to happen and there was a degree of surprise that it was not already standard practice.

At the same time, most consumers also raised concerns around data-sharing between suppliers. Most commonly, they were concerned about the potential for their data to "fall into the wrong hands" and be subject to misuse – a concern that appeared to have been heightened by recent high-profile cases of data breaches, not least the Cambridge Analytica, scandal, which featured heavily in the media around the time the research was conducted. They were especially wary of the scope for their data to be shared with, or leaked to, organisations beyond their own service providers and subsequently used for purposes other than that intended, not least direct marketing.

> *"I'm with Scottish Water anyway, so I would have no qualms about [my details being shared] but of course you have got no guarantees with what Scottish Water are going to do with it afterwards. That's the only thing I would think about that, that it's okay them passing it on to somebody, but you don't know what's going to happen after that."*

> Unregistered male, elderly

> *"We get bombarded all the time by all these different companies and phone calls about various things. I wouldn't want somebody to keep bombarding us with calls and letters and what have you, like you get with double glazing and all these other things."*

> Registered male, elderly

"People phoning and harassing – there's nothing worse than constant harassment."

Unregistered female with a chronic condition and mental health condition

For one participant, such concern was based on (perceived) first-hand experience. She described how her PSR details had been passed on to her electricity network operator (SSEN) by her energy supplier (which is standard practice so that they can take action in the case of a power cut). However, she was unhappy about subsequently receiving frequent contact from the network operator, which resulted in her retracting her agreement for them to hold her details.

"I usually say no [to passing my details to third parties] but I said yes to that one, and then I phoned them up and told them to take me off their list...because like the SSE and stuff were phoning... they just constantly call."

Registered female with a chronic condition, mental health condition and young children

A minority of consumers expressed outright opposition to data-sharing between suppliers, arguing that they would prefer to register with individual service providers themselves, so that they could take the opportunity in the process to learn more about the support the providers offered, or because they wanted more control over their personal data.

In terms of conditions participants generally felt needed to be in place before any data-sharing was permitted, first and foremost they stressed the importance of their consent being acquired in advance of their data being shared with another provider. Several participants said that they would only be comfortable with the sharing of data if their supplier had explicitly asked their permission to do this, which is consistent with findings from wider research on public attitudes to data-sharing and linkage[25].

"I think that [passing data between suppliers] should be my decision, not theirs. I would be happy to do it, but I would have to give permission first."

Unregistered female with physical disability

"I wouldn't mind as long as I had looked into it first and gave my normal supplier permission to do it, you know."

Unregistered female over pensionable age

In addition to their consent being acquired, participants said they would also want to be informed about the nature of the data-sharing proposed, and reassurance that their personal details would be treated securely and not shared beyond essential service providers.

"I would like really to make sure it's secure and I would like to be clear that nobody else would know about anything...sometimes you tick a box for them to give your information to other people."

Registered male, elderly

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[25] http://www.gov.scot/Publications/2012/08/9455/3

I don't think your information should be passed on, full stop, unless you've given permission. If you've ticked a box, then fine, but if you haven't your information shouldn't be getting passed on.

Registered female with physical disability

For their part, the industry representatives and other stakeholders interviewed, though generally aware of the potential benefits of data-sharing, felt that the necessary systems were not yet in place to enable it to be taken forward in the way consumers envisaged. They made two main points in this regard. Firstly, they were concerned about potential confusion among providers regarding accountability and who would be responsible for protecting, as well as updating, the data. This in turn, they felt, had implications for the transparency of the process from a consumer point of view.

"I think the big issue with data-sharing is knowing who is ultimately accountability for owning and updating that data, customers and companies need to be aware and confident in this process."

Water sector representative

"It can't go to a point where it is shared off into places and then all of a sudden the customer loses visibility of who knows what about them and why they need to know about that."

Energy sector representative

"The concern would always be for me of how engaged are the suppliers with the maintenance of data. There would be an expectation around how quickly you were updating and or removing [customer details], because if someone has informed you that they want to be removed, then obviously they need to be removed."

Energy sector representative

Secondly, stakeholders identified practical barriers to data-sharing arising from differences between existing registers. Specifically, they felt that issues may arise due to differences in the format in which organisations record consumers' details as well as the *type* of details they record. One participant felt that these issues would mean that data-sharing would necessitate contacting consumers multiple times thereby undermining any potential simplification of the process from the customer's perspective.

"The only issue I would say is [suppliers] wouldn't hold the address record under the same reference, so you could end up with address-matching queries, you know, so you would have a sort of process issue, I would think."

Energy sector representative

"I think there is a bit of an argument it doesn't actually make the customer experience any easier…I've heard that trials that have been happening down south and there is a data-sharing arrangement in place, but the separate utilities are having to contact this potentially vulnerable consumer to ask them different questions, because their registers are set up slightly different."

Water sector representative

Further, and reflecting the consumers' views, stakeholders felt that certain conditions would need to be met in order for data-sharing to work; not least very clear and transparent communication with consumers about precisely how their data would be used. One participant suggested that in order to minimise potential sensitivities around the process of data-sharing, suppliers could categorise consumers by vulnerability codes, as is current practice in the energy sector, rather than specifying details of their conditions.

"As long as you've shared with [the customer] the reasons you would use [their information]. So, when they came on to supply with you, you said any information around your vulnerability that we may share with the broader utilities group for ways of benefitting of X, Y and Z, and then you've got their opt-in. You don't even then need to say what the specifics of their ailments are, you would just state what code they are."

Energy sector representative

Other improvements: a single register?

Consumers were generally supportive of the idea of a single register; indeed, a few suggested the idea spontaneously. They variously stated that they felt "comfortable" or "alright" with the prospect and some were enthusiastically in favour of it – indeed one focus group participant contended that having one's details recorded in this way to facilitate appropriate service provision "should be a right."

Participants perceived a number of potential advantages of a single register. In particular, and echoing what they said in relation to data-sharing between providers, they contended that it would promote greater consumer awareness of, and, consequently, access to, support services.

"I'm all for [a single database], yes, because I wouldn't have known what was going on if you hadn't phoned me…I'm at a stage of life where I really could be doing with knowing about these things."

Registered female with a chronic condition and hearing impairment

"I suppose that would be alright if it was just for support that would be fine – it would be good to know if there was something that would help you."

Registered male with physical disability and mental health condition

"You know, I don't know exactly what is out there, you know there might be other things that I don't know about. "

Registered male with visual impairment

They also widely commented that a single register would serve as an effective "one-stop shop" such that, once consumers have registered, they can rest easy in the knowledge that providers were aware of their circumstances and needs, and would cater for them accordingly.

"*That sounds [better]– just one basic site with information in one place*"

Unregistered female with chronic condition

"Because you've got your priorities and that and then you don't have to worry about anything going wrong and that, you know the phone numbers."

Registered male with chronic condition and mental health condition

Again, however, there were concerns about who might obtain access to the database and how consumers' personal details might be used. A minority of participants felt that a central register would feel more "removed" from their control than individual registers held by their supplier – there was a clear sense in which they assumed that the holder of the database may make decisions on their behalf, which may, or may not, be in line with their own preferences.

"I don't think that's a good idea at all.   wouldn't be in control of anything then, I'm going to get bombarded with emails and paperwork and post and everything. My details could be out there and once they go there they could go anywhere."

Registered male, elderly

Thus, participants' support for a single database was, again, largely contingent on their being provided with clear information about how their data would be used, and their consent being requested prior to any new instance of a supplier gaining access to it. On a specific related point, one participant commented that he would want to be able to opt out of any telecoms companies being able to access his details as he has previously worked in the industry and was wary of any former colleagues coming to know about his personal circumstances and, in particular, his health condition.

Some consumers were, in addition, keen to retain a degree of control over which of their details were shared. While they were generally happy with their *support needs* being shared, they were less so about the idea of the specific details of their conditions or vulnerability being shared.

"They don't need to know what your illness is exactly. They don't need to know your blood pressure or anything like that. They just need to know that you need help."

Female focus group participant

More generally, participants commonly expressed a view that measures should be in place to ensure that any single database could only be accessed and used for the express purpose of targeting support services.

> "...If the data is shared with people who are going to help me, that's fine, but I don't want to start getting some emails from people, you know what I mean, companies that I wouldn't be wanting to deal with or whatever. "

> Registered male with visual impairment

Participants were asked which organisation or sector might be best placed to 'own' or oversee the central database. Views on this varied but the single most commonly suggested organisation was the NHS, with numerous participants arguing that medical professionals already held information about individuals' vulnerabilities so would be best placed to inform people about the existence of the register and the range of additional support services they could access through it. Other participants suggested the government or local authorities may be best placed to take on this role.

> "You just need a system [that lets] your doctor highlight your name [if you need support] and it gets sent through to the register."

> Male focus group participant

> "It should be the government that hold it and they should only issue the information to the people, like the power companies and the people who could use it to benefit the public."

> Female focus group participant

As in the case of the data-sharing scenarios, the industry representatives and other stakeholders interviewed held more mixed views than the consumers on the desirability and practicality of a single database. On the one hand they shared the consumers' views that such a single resource could potentially simplify the process and mean that consumers would be free from the burden of having to register with multiple suppliers and on multiple occasions.

> "It just seems stupid to me that energy companies, water companies, and probably in future other companies as well, have to ask the same intrusive questions of the same customers... if we were able to access a common database that lets us know what that customer need is, that's all we need to know."

> Energy sector representative

At the same time, there was a strong sense among the stakeholders that the change would risk losing some strengths of the existing system, while potentially creating a range of unintended consequences. One point commonly made in this regard was that different types of vulnerability had varying relevance and implications for different sectors, and that an overly standardised approach could result in the information contained in the database being too general to allow for the provision of services that were truly tailored to individuals' needs.

"I know there is some differences though in terms of the prioritisation of vulnerabilities between energy and water, so it's just making sure that we have got something almost like a combination of the two, because obviously things like, maybe kidney dialysis and other elements are maybe more important on the water side than they are on the energy side."

Water sector representative

"I kind of think it should be central and should be a lot more dynamic, but I think with sort of a caveat that I think there are services that probably sit with energy, with who they pay their energy bills to."

Network operator representative

One stakeholder from the energy sector contended that the sector was further ahead than others when it came to vulnerability registers and that it would not want its progress to be undermined or replaced with something inferior – a throwing out of the baby with the bathwater, so to speak. Relatedly, other stakeholders expressed a view that consumers may feel less comfortable sharing sensitive personal information with a single public body than with a supplier with whom they had an existing trusting relationship.

"We know that [the energy sector is] quite far ahead, so even things like the water sector comes to the energy industry for advice somehow to make it successful. So, what I wouldn't want to do is just kind of say that that will happen and we will switch off our vision overnight. I don't think we would ever want to kind of lose the ability of the customer to still register with us and then we can maybe still feedback into that central pot as well."

Energy sector representative

"One thing [that] has always been on the consumer's mind is what will you be using it for? I think consumers in the general public are aware, especially now with the current things going on in the media, you have my information, but what are you actually doing with it?"

Energy sector representative

"Some customers won't want their data to be shared, but they might still be feeling comfortable sharing it individually with a partner that they have actually built up a relationship with."

Energy sector representative

Some stakeholders also identified practical challenges related to maintaining the accuracy and currency of a single register, given that certain vulnerabilities are transient and subject to change. They commented that this could place a significant administrative burden on whichever body was charged with overseeing the database.

"I'm just wondering if you would be putting a big burden on local government, because that is where it's going to come from, I would imagine. A burden on them doing things that the suppliers should be doing. "

Network operator representative

On the question of 'ownership' and oversight, stakeholders, like consumers, put forward differing views and preferences. These ranged from the government or the NHS; to the National Records of Scotland. A further suggestion was that the Post Office could provide a "front office" for the register, proving a place where consumers could go to sign up.

"Most councils [in Scotland] make use of the national register on a regular basis to get updated details on births, deaths, marriages etc. Perhaps a national service could be linked to this data?"

Water sector representative

5. Conclusions and recommendations

Conclusions

The research identified a wide range of additional non-financial support services in the regulated industries, and beyond, for people in vulnerable situations. Though the nature and scale of provision varied by sector, and organisation, generally services were available to customers in a diverse range of situations.

The services offered were varied in nature though broadly fell into three main categories: adapted or tailored communications for customers; measures to enhance physical accessibility of services; and measures to promote safety and security. Energy providers tended to offer a wider range of services than other sectors, both in the regulated industries and beyond. The process by which consumers could access support services also varied between sectors. In the energy and water sectors, customers could choose to be placed on their provider's register, with the registration process broadly similar across organisations. No such register existed in the postal or, indeed, other sectors out with the regulated industries that were covered in the review, and the means of accessing support in these sectors varied by organisation.

The interviews with stakeholders highlighted the efforts which organisations in the regulated industries had made over recent years to improve the support offered to customers in vulnerable situations. At the heart of these efforts was an understanding that vulnerability was a broad and diverse concept, and that the ultimate goal should be to identify individuals' specific circumstances and needs, and adapt services to ensure that these needs were met. Stakeholder feedback also highlighted the challenges faced in delivering non-financial support, however, including through the use of consumer vulnerability registers; not least identifying potential eligible customers. While uptake of registers had increased recently, there was widespread acknowledgement that more needed to be done to increase the visibility of these to customers.

Among the consumers interviewed, awareness of additional support services varied, which appeared to reflect the manner in which these services were typically promoted by providers. Participants who were aware of services had generally been told about them by their provider when setting up an account, or when their provider had visited their home. Participants who had had limited or no interaction with their providers were comparatively uninformed about available support. Awareness of vulnerability registers specifically was similarly mixed.

Attitudes to vulnerability registers, among those who were aware of them, were generally positive. Registers were seen as a vital resource, making it easier for those in vulnerable situations to access essential services, particularly in cases where they were dependent on energy and water sources due to the severity of their health conditions. This positive sentiment extended to the perceived adequacy, appropriateness and quality of support services delivered: there was no negative feedback on these aspects. Still, given the finding that not all organisations collected customer feedback about non-financial support services, it may be that there is unidentified scope to enhance provision and make it more customer-centred.

In terms of the registration process, views were also positive. The process was seen as quick and straightforward, and nobody identified any specific issues or problems with it.

However, some participants expressed concern about the need to re-register with different companies when switching from one supplier to another due to the burden this potentially placed on consumers and the risk that they may miss out on important services, as a result.

Recommendations

The research and subsequent action planning workshop among stakeholders identified a number of recommendations for improving the process of providing non-financial support for consumers in vulnerable situations. These recommendations can be grouped into three main themes: ways of identifying and engaging with consumers in vulnerable situations; means of streamlining and simplifying the registration process; and the need to identify means of cleansing existing data sets to ensure consumer details are kept up to date.

Identifying and engaging with consumers in vulnerable situations

One of the challenges identified in the research was that of ensuring all those who are potentially eligible for support are identified as such by providers and given the opportunity to access it. Several actions were identified to encourage greater awareness and engagement among consumers. While these initiatives were already being pursued by some providers, there is scope for these to be adopted more widely and more consistently by organisations across the regulated industries:

- **Better consumer-facing information about support services focused on consumer needs, rather than around categories of vulnerability.** One of the most prominent themes of the research was the need for continued consideration of how vulnerability is defined in the regulated industries. While providers have clearly taken the regulators' lead in adopting a very broad definition, it may be that there is scope to broaden this still further to ensure that groups of customers who might benefit from services do not 'fall through the net'. Stakeholders also stressed the importance of recognising that consumers may not always know when they are in a vulnerable situation, and that vulnerability can be subjective depending on each individual's circumstances. They therefore felt that any consumer-facing communications used by providers should concentrate on the individual's needs, rather than on their vulnerability – asking questions such as *"what sort of help do you need?"* rather than *"which of these categories do you fit into?".*

- **Sharing of good practice in identifying and engaging with consumers.** The review of existing provision identified a wide range of ways in which providers across the regulated industries had sought to identify those eligible for additional support, suggesting the need for the continued sharing of good and best practice to ensure approaches that have proven effective are more widely pursued. These approaches include signposting of services between and across organisations and sectors; and getting out into the community – neither of which were standard practice. In the water sector, where there is no existing consumer database, there may be particular benefits to be seen from increased efforts to engage proactively with consumers in vulnerable situations by working through existing community groups and resources. Stakeholders suggested that the CFU may have be best placed to play a role in collating and sharing such examples of best practice.

- **More widespread training of staff to identify consumers in need**. In line with the focus on consumer needs, staff training was seen as an important way to improve the identification of consumers who may benefit from additional support. Examples of good practice in relation to staff training emerged in the research, but, again,

these were not standard. A move towards a more widespread and consistent approach, drawing on these examples of good practice, should therefore be encouraged.

- **Closer collaboration and information-sharing between third sector, public sector and providers**. Myriad organisations engage with and provide services to consumers in vulnerable situations but, as noted above, providers still faced challenges in ensuring that all those potentially eligible for support were identified as such. There was an appetite across the different research audiences for closer working and sharing of intelligence between providers and the public sector, particularly the NHS, which was seen as an obvious and reliable source of information on the most vulnerable members of society, and the types of support from which they would most benefit. Closer working between these organisations should therefore be encouraged, particularly so that third-sector (e.g. charities working with older people) and public-sector (e.g. health and social care services) organisations could easily signpost consumers to support from their essential service providers. Such signposting may help to address the challenges associated with identifying eligible consumers in the water sector, and help to encourage greater uptake of additional support from water consumers. This recommendation echoes that of the Utility Regulator in Northern Ireland[26] and examples of good practice seen in England and Wales; for example the Wellington Healthy Homes initiative (involving collaboration between health providers and energy companies). Stakeholders felt that this signposting would be made easier through a more streamlined approach to the registration process (see below).

- **More widespread gathering of consumer feedback**. Among those consumers that had made use of additional support services, views on the quality of those services were generally positive. However, feedback from stakeholders indicated that not all providers were gathering feedback from consumers about the quality of their additional support services. This may mean that there is unidentified scope for service improvement. By adopting a more widespread and consistent approach to consumer feedback, providers may uncover opportunities to further enhance service quality and respond more closely to the needs of consumers.

One of the strongest findings of the research is the necessity of, and appetite for, a redoubling of efforts to raise consumer awareness of the very existence of support services in the regulated industries, beyond those already mentioned above. The research pointed to the need for a multi-layered approach, from the ongoing incorporation of relevant messaging in providers' existing customer communications; to large-scale media campaigning as a means of reaching people in their homes.

Simplifying the current process

The challenges associated with the current system of multiple registration were noted by consumers and stakeholders. However, while there was some support among consumers for greater sharing of information between the different regulated industries, stakeholders were more cautious, stressing that any such sharing of information should be predicated on clear and unambiguous consent being acquired from consumers. In the context of recent high-profile cases of data breaches, as well as the new GDPR, careful consideration would need to be given to a number of aspects, including how much detail about consumers' vulnerabilities would be shared – there would need to be enough detail to ensure appropriately tailored service provision but not so much that consumers might be put off granting consent for their data

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[26] https://www.uregni.gov.uk/sites/uregni/files/media-files/Care%20Register%20Review%20Final%20Decisions%20.pdf

to be shared. As a minimum, as recommended by the Utility Regulator in Northern Ireland[27], such data-sharing should be supported by a data-sharing agreement between the relevant organisations. To ensure a robust level of scrutiny of this process, stakeholders suggested that regulators should play a role in making sure that providers in the regulated industries are seeking consent in the correct way.

In light of these concerns around data-sharing arrangements, the following recommendations were therefore put forward as an alternative means of addressing the challenge of multiple registration and simplifying the current process:

- **Putting procedures in place to support the sharing of information between organisations.** Stakeholders and consumers felt that sharing of Priority Service Register information between providers could ease the transition for consumers, reduce the burden on the consumer to inform the companies themselves, and ensure that they received the support services they were eligible for. In developing an approach towards data sharing, lessons could be learned from existing approaches such as the data matching process used as part of the Warm Home Discount[28] scheme. Through this process, the DWP informs suppliers which of their customers are eligible for the scheme, which means these customers automatically receive an energy bill discount each winter, without the need to take any action such as filling out applications, thus reducing the burden on customers. However, it was stressed that any sharing of Priority Service Register information should be predicated on clear and unambiguous consent being acquired from consumers. It was seen as essential that consumers are made aware of what information was being shared, who it was being shared with, and for what purpose. To ensure a robust level of scrutiny of this process, stakeholders suggested that regulators should play a role in making sure that providers in the regulated industries are seeking consent in the correct way.

- **Simplifying the current registration process through a central resource**. Rather than a single register, which may create a number of challenges relating to integration of data from numerous organisations, it was felt that a more practical and consumer-centred alternative would be a single *registration process*. In practice, this could involve a central resource through which consumers provide their details, from which they are then signposted towards the registers that best meet their needs. Appropriate consent would need to be included, by consumers specifying which organisations they were happy to register with (e.g. their energy provider, network operators, and Scottish Water). From a consumer perspective, this would mean that they would provide their details once, but providers would still maintain and be responsible for their own registers. It was suggested that the central resource could be in the form of a website or a mobile app, and could work in a similar way to the existing Citizens Advice web resource[29] which provides information on how to sign up to Priority Service Registers, and provides links taking the user directly to the registration form for their energy providers. It could also work in a similar format to the Vulnerability Registration Service[30], a platform that allows customers to record their personal circumstances to protect themselves against debt or financial problems. These models, and other potential options, could be tested further through piloting and user testing (see below).

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[27] https://www.uregni.gov.uk/sites/uregni/files/media-files/Care%20Register%20Review%20Final%20Decisions%20.pdf

[28] https://beisgovuk.citizenspace.com/home-local-energy/warm-home-discount-2018/supporting_documents/WHD%20extension%20consultation.pdf

[29] https://www.citizensadvice.org.uk/consumer/energy/energy-supply/get-help-paying-your-bills/getting-extra-support-from-your-energy-supplier/

[30] https://www.vulnerabilityregistrationservice.co.uk

- **Testing the concept of a single registration process through area-based pilots.** Stakeholders suggested that pilots could be carried out, targeted in areas with high proportions of people in vulnerable situations or in areas that experience or are likely to experience high levels of supply interruption. Pilots could involve a single agency, such as a local authority, community group, or other public or third sector group, taking responsibility for identifying and referring people in their area who are in vulnerable situations, and signposting them towards the registers that are relevant to their needs. As noted in the previous point, the pilots would not involve the creation of new, single registers, but rather test approaches that best help to connect consumers with existing registers. It was felt that these pilots could help to identify what sorts of organisations would be best placed to take responsibility for overseeing the implementation of the central registration resource. Other approaches that could be tested in the pilots include:

  o Collection of data – whether the organisation responsible for making referrals would capture consumer data and pass it on to the appropriate providers, or simply direct the consumer to their provider to whom they provide their data directly.

  o Consent – the most appropriate approach to capturing consent for use of consumer data, which may vary depending on the data collection method.

  o Delivery mode – whether a stand-alone website, a webpage of an existing website, mobile app, or paper-based approach works best.

Data cleansing

Beyond the considerations above, a further recommendation emerging from the research was for **improved approaches to data cleansing to ensure that consumer details are as up to date as possible**. This includes removing deceased consumers from their registers and other databases, and removing those who are no longer in a vulnerable situation (e.g. if they no longer have young children, or their temporary health condition is no longer an issue). Stakeholders in the workshops suggested that each individual organisation should be responsible for updating their own information, but also suggested that providers could engage more with the "Tell Us Once"[31] scheme, which lets consumers tell their local authority about a death or birth, resulting in information being passed on to several government departments. Through the existing Tell Us Once scheme, departments that are informed of a death include the DVLA, Passport Service, Pension Service and HMRC. The scheme does not currently include utility providers, though such an approach could go some way to addressing concerns highlighted earlier in relation to difficulties keeping track of customers and updating their details accordingly. Lessons on data cleansing could also be drawn from previous initiatives, such as that carried out by Western Power Distribution (WPD), which updated 50% of its PSR records through a data cleanse programme in 2016/17[32].

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[31] https://www.gov.uk/after-a-death/organisations-you-need-to-contact-and-tell-us-once

[32] See UKRN, 2017, http://www.ukrn.org.uk/wp-content/uploads/2017/10/Making-better-use-of-data-identifying-customers-in-vulnerable-situations.pdf

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