



Vulnerability Commitment

Good Practice Guide | 2022



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1. Introduction

Steve Crabb
Independent Chair of the
Vulnerability Commitment



The past year has been the most challenging for customers and suppliers alike since the energy industry was deregulated in the 1980s. Fuel poverty levels have soared as a result of price increases driven by unprecedented rises in wholesale energy costs. Energy firms reported that call volumes from customers needing help rose sharply at the start of the year and did not tail off, even when the weather got warmer. Charities and other support agencies have told us that the proportion of callers threatening self-harm or even suicide has grown significantly as the cost-of-living crisis has deepened.

The Energy UK Vulnerability Commitment has played a vital role in these circumstances, working as it does to drive continuous improvement in four vital areas:

- **Accessible communications**
- **Keeping customers ‘on supply’**
- **Fostering innovation in support for customers who need extra help**
- **Encouraging collaboration between suppliers and other agencies**

In 2022, 12 suppliers participated in the Commitment, covering more than 80% of British households. The Commitment will be looking to increase the number of signatories it has as we enter into 2023.

All the suppliers who participated in 2022 pushed the boundaries of what they are doing to help customers in vulnerable circumstances, despite operating under serious cost pressures. Unsurprisingly, much of their focus was on customers in financial hardship – finding new ways to identify those customers, particularly ones who had no previous history of problems paying their bills, and new ways to help them pay for their energy.

The pace of growth in other areas, such as innovation in the number and variety of communication channels offered to customers, slowed down in 2022 although it didn't come to a halt: suppliers of all sizes told us they are working harder to understand customers needs and find better ways to meet them. This is one of the defining features of the Energy UK Vulnerability Commitment: it doesn't set out to police a minimum standard of safety net for customers, but rather it seeks to push suppliers to reflect on what they do and constantly work to do it better. It was gratifying, too, to hear how many suppliers said they had tried out new initiatives as a result of reading about what other suppliers were doing in last year's best practice report; that's exactly what we were hoping to see.

“All the suppliers who participated in 2022 pushed the boundaries of what they are doing to help customers in vulnerable circumstances.”

This doesn't mean that everything suppliers are doing is perfect. Concerns were raised this year about whether some suppliers have the right controls in place to ensure that customers with smart meters aren't switched into pre-payment mode when that's not appropriate.

We didn't see as much growth in partnerships with charities and other third parties as we'd expected, or hoped. We will be working hard in 2023 to encourage suppliers to address these issues.



1. Introduction continued

This is my second year as independent chair of the Energy UK Vulnerability Commitment, and it has once again been a privilege to support this scheme. I'd like to thank the following for their invaluable support:

Gillian Cooper of Citizens Advice and Dhara Vyas of Energy UK, my fellow members of the Commitment's Expert Panel, who steered the Vulnerability Commitment and joined me in scrutinising the 12 participating suppliers in rigorous panel interviews.

The team members at Energy UK, including Darcy Collings and Colin Brooks, who supported the Commitment throughout the year, Daniella Weduwer, who played a key role in shaping the Commitment before leaving Energy UK mid-year, and Robert Birch, who joined the team in 2022 and made an instant impact.

Our advisory board (see page 5), whose subject matter expertise has been so important this year. Their testimony about what the energy crisis actually means to customers in vulnerable circumstances has been powerful, and reminds us why this voluntary code matters so much.

I'd also like to thank the suppliers who participated in the Commitment this year for the work they put into preparing their evidence to the expert panel, for their honesty in addressing issues which are not going as well as they should, and for the work they are doing to support those most in need in this crisis. They deserve recognition for the good work they do, and that is part of the reason we publish this report – alongside the goals of sharing best practice and inviting dialogue and constructive challenge from our stakeholders.

Finally, I would like to pay tribute to Audrey Gallacher, the Deputy Chief Executive of Energy UK, who passed away in January of this year. She was an indomitable fighter for justice and fairness who played a seminal part in the creation of the Vulnerability Commitment from the outset. She is greatly missed.

Steve Crabb

Independent Chair of the Vulnerability Commitment



2. Vulnerability Commitment Key Facts

2022 Signatories

- British Gas
- Bulb
- E
- Ecotricity
- EDF
- Good Energy
- Octopus Energy
- Outfox the Market
- OVO Energy
- ScottishPower
- SO Energy
- Utility Warehouse



2022 signatories that exited the market:

- **Together Energy**

Compliance was monitored through a statement signed by the board-level vulnerability champion in each participating supplier, a detailed Request for Information asking for evidence of compliance with the 14 specific commitments, and expert panel hearings in which participating suppliers were challenged individually over their compliance with respect to three areas:

- Identification
- Payment Support
- Training

These ‘deep dive’ topic areas were agreed with the Commitment’s Advisory Board, reflecting topics of particular concern for customers throughout 2022. The Advisory Board meets twice a year to scrutinise and challenge the work of the Vulnerability Commitment. It also reviews the specific commitments made by suppliers to ensure these remain relevant to consumers.

The expert panel decided not to issue any Gold Stars to an overall supplier this year (the Commitment allows for up to three to be awarded in any given year) because of the extraordinary challenges facing customers and suppliers alike this winter and the recognition that some customers will, sadly, slip through the net no matter how hard suppliers try to prevent that. As a result, there was a risk that the industry, and the Commitment, could have been accused of trivialising the hardship that those customers will face if we issued Gold Stars. We are though, recognising that three suppliers – British Gas, OVO Energy and EDF – displayed outstanding practice in relation to one of the three commitments, and will be recognised through a Gold Star for an Individual Practice.

Gold Star Individual Practice Area	Supplier
Accessibility	British Gas
Collaboration	OVO Energy
Innovation	EDF



Vulnerability Commitment Advisory Board

Steve Crabb | Independent Chair | [Energy UK Vulnerability Commitment](#)

Dhara Vyas | Deputy CEO | [Energy UK](#)

Gillian Cooper | Head of Energy Policy | [Citizens Advice](#)

Adam Scorer | Chief Executive | [National Energy Action](#)

David Newton | Policy Manager | [Department for Business, Energy & Industrial Strategy](#)

Ed Dodman | Director of Regulatory Affairs | [Energy Ombudsman](#)

Gareth McNab | Director of External Affairs | [Christians Against Poverty](#)

Jane Tully | Director of External Affairs and Partnerships | [Money Advice Trust](#)

Janet Tremayne | Energy Compliance Manager | [British Gas](#)

Matt Baker | Credit Strategy and Vulnerability Manager | [OVO Energy](#)

Sharon Gill | Extra Help Operations Manager | [EDF](#)

Steven Donovan | TCF and Consumer Vulnerability Lead | [OVO Energy](#)



3. Themes

3.1 Identification of vulnerable customers

During the Vulnerability Commitment panel hearings this year, the expert panel was pleased to hear that all signatories had been increasing their work to identify vulnerable customers, with a specific focus on those with ability to pay challenges.

The need for suppliers to find innovative ways to identify vulnerable customers has become more crucial than ever. This is important as the current gas crisis is resulting in many customers who may have never experienced ability to pay problems finding themselves unable to afford their bills. This highlights the importance of energy suppliers having clear communication with their customers, allowing them to proactively identify any vulnerabilities and providing relevant, targeted support.

During the panel hearings, we heard how E have been refocusing their field staff to do home visits for customers in vulnerable circumstances. They detailed how this included visiting households with traditional pre-payment meters who have not been constantly topping up, with trained staff communicating with the customers to find the most suitable outcome of support. This could involve installing a smart pre-payment meter if it is safe and suitable for the customer, allowing them to make top up payments through an online service. We also heard from other suppliers including Octopus and Bulb how they proactively communicate with customers when certain account triggers such as a missed payment, cancelled direct debit or lack of meter readings are identified.

We heard how suppliers are continuing to treat the smart meter roll out as a top priority. This is important when aiming to identify vulnerable customers, as the real time data from the smart meter can provide suppliers with an insight into customers that may be struggling to top up their pre-payment meters. This then allows for proactive communication to take place between supplier and customer, allowing for any vulnerabilities to be identified and supported.

We heard from several suppliers; SO Energy, Bulb, Octopus, Utility Warehouse, Scottish Power, OVO Energy, about how their customers were able to submit Priority Services Register PSR data directly to their online account, allowing for real time access to their data. This allows customers to actively update their circumstances, without increasing the pressure on front-line call center staff, who are seeing an increase in calls during the cost-of-living crisis. The panel was pleased to hear of the continuous development of web-based applications (apps) , with a focus on ensuring these were accessible for all.

ScottishPower and Bulb also described how they have continued to focus on their customer phone routing ability to targeted specialised teams. The telephony routing ensures customers are put through to an agent trained to be able to offer specialist advice and support, without any action from the customer being required to initiate this. This can include the front-line staff listening out for young children at the property, as well as picking up on terminology that might imply the customer is vulnerable. Staff are also trained to proactively and sensitively ask certain questions that might help identify vulnerability at the property. Ways in which this has been effective include telephony systems identifying account markers such as account balance and last top up, and then routing customers to the correct specialist team based on their account information. We also heard how Outfox the Market are using social media channels and forums to encourage customers to openly engage with their social media team, allowing relevant topics to be discussed and vulnerabilities to be identified by the specially trained team.

We heard how many suppliers have been proactively engaging with customers from the point of sign up. They aim to capture any vulnerabilities, promoting PSR sign-up, making it easier for the customer to disclose any vulnerabilities. We heard how many suppliers include signposting to the PSR and additional support across all their outbound communications.



We also heard how EDF have processes in place with third party organisations, such as Citizens Advice Plymouth and Income Max to share information they have gathered about vulnerabilities, recognising that not all customers will feel confident in disclosing vulnerable circumstances directly to their energy suppliers. We were also pleased to hear how Bulb has partnerships with Citizens Advice Plymouth and IE Hub to offer a holistic approach to helping their customers.

EDF have implemented a data-driven, customer-focused solution called Right Track Customer Journeys. This identifies customers who are falling behind on payments, analyses the specific circumstances of the customer, and then reaches out to the customer using targeted communications. These communications, alongside their CARE+ Customer Support framework, help to provide support that is individually tailored to the customer's personal circumstances.

Gold Star Individual Practice Case Study – EDF



EDF is using multiple sources of data to identify customers who find themselves in a vulnerable situation because of the cost-of-living crisis. This includes those customers who already have a vulnerability which is known to EDF, as well as those who were not previously known to be vulnerable but who are demonstrating a change in behaviour which indicates they may require extra support.



Examples of the data sources EDF is using include: (this is not an exhaustive list):

- Customer vulnerability data
- Payment history
- PAYG/Prepayment top ups – frequency, value and method
- PAYG/Prepayment emergency credit and self-disconnection insight
- Affordability data

EDF is combining multiple data sources to identify groups of customers who may need extra support and proactively contacting those customers through their Right-Track customer journeys to offer tailored support.

EDF has implemented a range of new support packages to ensure vulnerable customers impacted by the cost-of-living crisis can access the help they need – the packages include:

Helping Hands – gifted weekly top up contributions to PAYG and Prepayment customers, throughout winter 2021/22 and will continue throughout 2022/23.

Fresh Start – debt clearance for vulnerable customers who do not meet the eligibility criteria for broader industry and WHD support schemes.

Take Control – helping customers move to Smart meters and get access to the EDF Energy Hub app, providing customers with effective tools to reduce their consumption.

Examples of customer groups who have been identified and proactively offered one or more of the above support packages include:

- Elderly customers that EDF has identified to be living alone
- Households who are medically dependant on an electricity supply
- Customers who are at risk of or who have self-disconnected, or have been supported with temporary loans to top up their PAYG/Prepayment meter(s)

EDF understands that not all customers who need support will feel comfortable to engage directly with their supplier, so they are also working with trusted third parties and charities to contact customers who are not engaging and let them know about the extra support available.



3.2 Support for vulnerable customers

During the panel hearings, we were also pleased to hear how many suppliers have partnered with third party organisations to help support their vulnerable customers, as well as signposting for better financial advice. Collaboration is a key principle of the Vulnerability Commitment that signatories sign up to, showing their willingness to ensure they can offer the best available advice for their vulnerable customers who are struggling to pay.

We heard how many suppliers including OVO Energy, ScottishPower, Bulb, Octopus, Utility Warehouse, EDF, Ecotricity, E and British Gas have specialised affordability teams, who have trained staff that are able to recognise, support and signpost customers who are struggling to pay to achieve the most suitable outcome for the customer. This can include teams being trained to apply ‘breathing space’ to accounts, as well as extra training in how to recognise signs of vulnerability. We heard from many suppliers how there is a focus on ensuring that the customer receives the correct guidance for income maximisation if appropriate, rather than just focusing on a solution for their energy bills.

We also heard how most suppliers have an ongoing partnership with StepChange, the debt charity. This allows for suitable repayment plans to be offered, alternative payment options and tariffs, as well as signposting to support agencies across a range of contact channels. Through these partnerships, staff have received advanced training, covering how to identify vulnerabilities and what specific support is available. There is also an option for direct transfers from the supplier agents to a member of StepChange for customers to start their debt advice process, as well as receiving tailored affordability plans based on their individual circumstances.

Many suppliers reported that they have processes and partnerships in place to assist or signpost customers to maximise their income, such as Ecotricity and SOEnergy’s partnership with Money Helper. This is the service provided by the Money and Pensions Service, that enables Ecotricity and SOEnergy to deliver free regulated debt advice, helping support financially vulnerable customers who may be struggling beyond just their energy bills.

As well as this, we heard how E have partnered with the Fuel Bank Foundation, a charity supporting households who are not able to top up their meters. Utility Warehouse described the development of their own foundation, which donates funds to local community charities, supporting disadvantaged households that are identified as being at risk of fuel poverty. Outfox the Market has created a partnership with Scope, receiving training for their front-line staff about how best to manage customers with disabilities. ScottishPower also detailed their Quick Credit Voucher Scheme, which sees them partner with local support organisations such as foodbanks to provide prepayment customers at risk of self-disconnection with credit vouchers which do not need to be repaid.

EDF have offered an additional £5 million to support their vulnerable customers, with some examples of its tailored support package including matching top-ups for prepayment customers who cannot afford their ongoing consumption, bill credits for customers who move to smart meters and sign up to EDF’s Energy Hub to help reduce their bills, and clearance of debt in some cases to support customers. EDF are also committed that their obligated spend under the Warm Home Discount provides sustainable solutions to their customers who need it most, including continuing National Energy Action vouchers for those not eligible for the Warm Home Discount.

Octopus originally set up a £5 million Octo Assist Fund (which has now increased to £15 million), to help protect those struggling to pay. Octopus customers were prompted to fill out a quick and simple online financial support form if required. After completion of the form, Octopus would then offer a range of support options based on circumstance and needs, including monetary support from the fund, or a loan of thermal imagery cameras to highlight heat leaks in certain properties. Approximately 57 thousand customers have been supported through this fund.



We heard how Octopus offers free electric blankets for their customers struggling with their bills. Over the last year Octopus have provided customers with 30k free blankets to support them in keeping warm and help reduce their bills. Data suggests that customers saved up to 10-20% on their bills on average in the Winter months after getting their blanket. Over a year, that's an approximate £300 saving. Octopus prioritised customers who'll benefit most: the elderly, and those with mobility issues or other medical conditions that mean they're more impacted by the cold.

British Gas has increased its financial commitment to the British Gas Energy Support Fund for as long as the energy crisis continues. British Gas is giving an additional £7 million to the British Gas Energy Trust (BGET), the independent charity it funds to support energy consumers facing financial hardship and energy debt, on top of its usual annual donation to the charity. BGET gives awards to customers of other energy suppliers, not just British Gas customers. British Gas has been funding advertising on national radio to encourage vulnerable households to apply for help, as well as adverts stressing the importance of providing regular meter readings to avoid 'bill shock'. Overall, British Gas has trebled its customer support in 2022 to £18million.

Gold Star Case Study – British Gas

British Gas

The British Gas Energy Trust (BGET) is an independent charity funded solely by British Gas. Since winter 2021 £25 million has been given to the initiative. British Gas have also committed to donating 10% of operating profits to the Trust for the duration of the energy crisis.

BGET is now open to new applications, offering up to £1,500 to customers struggling with their energy bills. This is available to customers of any supplier – not just if you're supplied by British Gas – anyone with £250 or more of energy debt can apply.

The Trust helps fund projects that deliver money and energy advice as well. Following the introduction of the British Gas Winter Fund campaign in November 2021, British Gas are also running a marketing campaign to proactively promote the fund to eligible customers by email or letter.

British Gas are also currently running a high-profile campaign called 'Stop the Silence' to help reduce the stigma of debt and encourage people to talk about their finances, so they can get the help they need. As part of this, in partnership with the Post Office, British Gas have been out into the communities to reach more customers in a series of nationwide pop-ups, outlining what they can do to support customers and raise awareness. This campaign has been advertised nationally through radio and cinema and is fronted by the celebrity Professor Green.

As well as this, a TV campaign is running on ITV, during prime time, to remind and reassure customers that British Gas Energy is there for them if they're struggling to pay, and to make contact with them so British Gas can offer support. British Gas will be contacting vulnerable customers by letter and email towards the end of 2022 to let them know about BGET and to urge them to apply.

In the trading update provided in November 2022, British Gas have committed to an additional £25m spend to provide help and support for their most vulnerable customers.





3.3 Training for frontline staff

As part of the panel hearings, the expert panel were happy to hear about how all suppliers are offering additional training and support for their frontline staff to help them support customers during these difficult times.

As the number of vulnerable customers and circumstances increase, so does the number of calls to energy suppliers. There are also higher volumes of customers disclosing distressing situations to frontline staff. Building expertise at dealing with the increasing volumes of challenging situations is vital to ensure good outcomes for customers and the mental and emotional wellbeing of staff.

British Gas, SO Energy and Good Energy work with external mental health charities to ensure that staff can deal with cases where customer mental health is an underlying cause of vulnerability. This allows for proactive communication by these suppliers, ensuring that their customers can receive relevant and effective support. OVO Energy work with external organisations to ensure their staff understand and can deal with customers with a wide range of visible and invisible disabilities, for example Samaritans and National Energy Action. The panel were also reassured to hear that all suppliers have introduced Suicide First Aid training to their front-line staff.

British Gas have committed significant investment towards engagement with customers who are likely to contact them. To manage the expected increase in customer contact, British Gas have recruited an incremental 700 customer-facing colleagues and have also temporarily increased support from offshore partners by an additional 700 roles. British Gas also have a dedicated Debt Customer Care (DCC) team who've been mental health trained. The DCC team will manage customer cases on a temporary and more long-term basis, where required. British Gas will continue to provide support to customers through numerous charity partnerships and have upskilled more call centre agents to help answer calls from these organisations to provide additional support.

We were pleased to hear how suppliers are redeveloping their internal training systems to reflect the industry's new reality. EDF have included training on dealing with vulnerable consumers in their new starter induction packs as well as introducing their CARE+ training course on support necessary for customers in vulnerable circumstances. EDF's CARE+ has involved over 28,000 hours of training to ensure all frontline staff and management attend the full day classroom-based training programme.

We heard how suppliers such as Outfox the Market, Ecotricity, EDF, E, SO Energy, Octopus were actively preparing for the price cap increase announcements during 2022-23 and the roll out of the Energy Bills Support Scheme. Suppliers are providing advanced training to all front-line staff, to help ensure an improved customer experience especially in times of higher demand and increased vulnerabilities. We also heard how suppliers regularly review and update their training programmes, to ensure they remain relevant in response to changing circumstances such as Covid-19 and the cost-of-living crisis.

Ecotricity have introduced a day-to-day support hub to allow customer-facing staff to access immediate guidance when dealing with difficult cases. Within this, they also allow referrals of colleagues between internal teams, to ensure that teams can work at their highest level of efficacy. Bulb have also trained their staff to deal with certain vulnerabilities, including economic abuse, SOS and domestic violence cases, as well as introducing their 'tough contact submission' form. This allows front-line staff to record any difficult conversations, and they will receive a response from a member of staff from their well-being to provide support.



British Gas told us about their digital platform, introduced in 2021, that prompts customers about their outstanding balances, providing them a variety of support based on their current circumstances. The online portal allows some customers to fully self-serve and resolve their issue, but all customers are given a chance to speak to a contact centre agent.

Octopus have trained vulnerability champions across every team providing expert guidance and support to energy specialists on extremely vulnerable customer situations which need extra care and support. They have introduced a Helping Hands internal messaging system where colleagues can reach out and be provided with assistance on any urgent vulnerable situations. All colleagues have been trained on a range of topics, including cost of living impact and the energy crisis, as well as managing suicidal conversations, mental health and mental illness, in partnership with Better Pathways Charity.

Gold Star Individual Practice Case Study – OVO Energy



OVO Energy launched its ‘Vulnerability Academy’, offering customer-facing teams enhanced training and guidance on how to recognise, record, and best support vulnerable customers.

This involves specialist training including:

- Cost of Living training delivered by Money Advice Trust
- Managing Suicidal Conversations and Conversations with Vulnerable people delivered by Samaritans
- Scams awareness as part of Utilities Against Scams
- StepChange awareness as well as training on the company’s payment plan policy
- Dementia awareness



The training has been rolled out to over 100 of their specialists in teams supporting vulnerable customers, one of those teams is their charity support team helping support agencies such as NEA and StepChange. They said “The training we’ve received has given us a better understanding of what customers in vulnerable situations can go through and has allowed us to get closer to the customer.”

In addition to the Vulnerability Academy, OVO Energy has focused on specific training for engineers on how best to support vulnerable customers when visiting their properties. They’ve successfully rolled out a vulnerability training program, which involves a series of online learning modules to 93% of its engineers. This has then been enhanced further with the introduction of digital tablets for all customers to use during their smart installation to help support their smart journey and receive bespoke energy efficiency advice.

To ensure the training is easily recalled during day-to-day conversations with customers, OVO Energy launched its Vulnerability toolkit in September 2021 and has over 1,500 confirmed unique users, collating detailed support for vulnerable customers in a simple, user-friendly manner.



4. Next steps

This guide closes the monitoring phase of Year 2 of the Vulnerability Commitment, which found all participating suppliers to be compliant with its requirements.

We will be inviting applications from suppliers for Year 3 of the Commitment, in which we hope to increase the number of participants and to raise the proportion of energy customers covered by participating suppliers to over 80% of the market. Energy UK has conducted a review of the Commitment at the end of Year 2 and listened to the views of stakeholders on how the Commitment can evolve to reflect the changes we have seen since it was launched.

As we move into the third year of the Commitment, we will continue to use the expert panel and Advisory Board to ensure that signatories of the Commitment continue to reflect on their current processes to support vulnerable customers, as well as striving to constantly to better. The panel hearings will ensure that signatories continue to demonstrate the innovative work being done to support those most vulnerable, and the Commitment will continue to push suppliers to ensure the highest standards for vulnerable customers are maintained.





Appendix

Principle 1: Accessibility (Communications)

Accessibility is one of the three key principles of Energy UK's Vulnerability Commitment, along with Collaboration and Innovation.

Participating suppliers must make it as easy as possible for customers in vulnerable circumstances to disclose relevant information, and to access the most suitable additional support.

Requirements of the Vulnerability Commitment: Accessibility

- Equipping front line staff and all those in relevant roles with effective training - whether internally or externally delivered - in identifying and supporting customers who might be in vulnerable circumstances;
- Ensuring that an understanding of customer vulnerability is embedded throughout all relevant levels of the company and ensure any external agencies operating on the company's behalf have robust vulnerability policies;
- Gathering feedback from frontline staff through various channels to highlight suggestions or issues that could help the company to improve support for customers in vulnerable circumstances;
- Taking all reasonable steps to design relevant customer communications and processes in a manner that supports customers to feel comfortable in disclosing vulnerabilities;
- Providing a range of channels of communication that are appropriate and suitable for customers' needs.

Abiding by these accessibility principles includes specific commitments to:

1. Provide a customer service phoneline that all customers can call without incurring a premium rate charge, and ensure a free phone number can be given to customers in financial hardship where appropriate.
2. Provide at least one alternative form of communication in addition to phone contact.
3. Ensure that customers have paper versions of all billing communications made available where this is appropriate for their needs.
4. Gather feedback from customers on the ease of understanding of billing communication and implement improvement measures based on these findings as necessary.

Principle 1: Accessibility (Access to Supply)

Along with ease of communication, the accessibility principle of Energy UK's Vulnerability Commitment also addresses the ability of customers in vulnerable circumstances to access energy – in other words, to stay on supply.

Participating suppliers commit to:

5. Only use High Court Enforcement Officers to recover debts where appropriate for a vulnerable customer, taking consideration of any wider vulnerabilities that may be exacerbated by Court enforcement action.
6. Never knowingly disconnect a vulnerable customer at any time of year, where the household has children under the age of 6 (or under the age of 16 during the Winter Moratorium) or where for reasons of age, health, disability or severe financial insecurity, that customer is unable to safeguard their personal welfare or the personal welfare of other members of the household.



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7. Never knowingly disconnect the non-domestic supply for reasons outside the domestic household's control, if it is determined that a member of a domestic household, which takes its energy through a non-domestic supply, is vulnerable.
8. Provide customers who have a new PPM installed (or have their meter switched to PPM mode remotely) for debt reasons with a package of support including PPM tariff advice (including signposting wider financial assistance where applicable) and energy efficiency information (including entitlement to energy efficiency measures).
9. Ensure that the customer is able to continue to access their energy supply immediately after a PPM installation or change of mode on a smart Meter to pre-payment, for example through provision of the tools required (e.g. a gas card) to apply credit to the meter or through preloaded credit being applied to the meter.
10. Take reasonable steps to alert prepayment customers of the risk of standing charge build-up during the summer, and encourage them to keep their meters topped-up during this time.

Principle 2: Collaboration

The second principle underlying the Energy UK Vulnerability Commitment is collaboration.

Signatories commit to working in partnership with consumer groups, their own customers, other energy suppliers and experts in order to improve outcomes for all customers in vulnerable circumstances by:

- Having a strategy and effective arrangements in place for signposting and referring customers to relevant third-party support, including debt advice agencies;
- Sharing learning and best practice with regard to supporting vulnerable households, including identifying smart meter self-disconnection and engaging customers with the PSR, as appropriate within the boundaries of customer confidentiality and Competition Law, to support customers;
- Having processes in place to signpost or assist customers to maximise their income, for example through partnerships with third parties to deliver benefit checks where appropriate;
- Contributing to increasing customer awareness of the support that energy suppliers can provide to vulnerable households, including raising awareness of the Vulnerability Commitment.

Abiding by these principles of collaboration includes specific commitments to:

11. Contribute to the funding of some of the charities and third parties that provide support to energy customers.
12. Support the development of a best practice guide, through engagement with this Commitment, of the most effective approaches to utilising smart technology to identify self-disconnection.



Appendix

Principle 3: Innovation

The third principle underlying the Vulnerability Commitment is innovation.

Participating suppliers commit to:

- Strive to not only meet the minimum requirements set out in licence but also to demonstrate continuous improvement in the provision of support to vulnerable households;
- Invest as appropriate in features and tools that improve the support available for customers in vulnerable circumstances;
- Demonstrate how relevant innovations and services are informed by an effective understanding of the characteristics of their vulnerable customer base.

Abiding by these principles of collaboration includes specific commitments to:

13. Assign a dedicated vulnerability champion, at board level or equivalent, who will be responsible for overseeing the delivery of commitments to improve service to vulnerable households.
14. Commit to supporting or undertaking regular customer research (either individually, in partnership with third sector organisations, or collectively through the auspices of the Commitment) to ensure their approach to supporting vulnerable households is based on an informed and up-to-date understanding.



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