



Vulnerability Commitment

Good Practice Guide | 2023



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1. Introduction

Steve Crabb

Independent Chair of the
Vulnerability Commitment

Welcome to the third Good Practice report from the Energy UK Vulnerability Commitment, which we publish as part of our commitment to driving innovation and collaboration in supporting customers in vulnerable circumstances across the retail energy market.

This has been another very challenging year for many customers, and indeed for suppliers, thanks to a continuing severe cost-of-living crisis, high energy costs and structural weaknesses in the economy which mean that many people working full time are still in fuel poverty.

However, whereas 2022 saw the energy supply industry in full fire-fighting mode, focusing all available resources on identifying customers in financial hardship and trying to find ways to help them pay their bills and stay on supply, 2023 has been a year of bounce-back, with energy suppliers of all sizes showing renewed appetite for finding new, often ground-breaking ways to support customers. This report showcases some of the best examples that suppliers shared with us.

This year we focused on three key themes, challenging participating suppliers to provide evidence that they were compliant with the letter of the Vulnerability Commitment, but also with its spirit – at the heart of which is the principle of continuous improvement.

Theme one was the role of the Vulnerability Champion, which is a fundamental requirement of the Commitment. Champions come in all shapes and sizes, from customer operations directors to chief executives. The best champions can ensure that vulnerability is front of mind at every board meeting and that their company's vulnerability strategy is embedded throughout the organisation.

The second theme was the use of Key Performance Indicators (KPIs) to measure outcomes for customers in vulnerable circumstances. We were delighted – and often surprised – by the range of approaches adopted by suppliers, some of which have built highly developed structures for reporting on their performance in supporting customers who need additional help.

The third and final theme was how companies ensure that insights gained by customer-facing staff – including those who work offshore and/or for outsourcing partners – are fed back into the business and used to inform service improvements. Again, this revealed an impressive range of techniques and tools being used by suppliers, all of which satisfied us that they understood the importance of capturing insights from customer-facing colleagues. These themes form the heart of this report, although suppliers also told us about other work they have been doing to continuously improve service to customers in vulnerable circumstances, which we have also included in this guide.

The Commitment has continued to grow and adapt in its third year. We welcomed two new participating suppliers – E.ON Next and Shell Energy, resulting in over 90% of British households now being served by suppliers who have signed up to the Commitment.



“Energy suppliers of all sizes have shown a renewed appetite for finding new, often ground-breaking ways to support customers at risk of vulnerability.”



It was also a year of change for the Commitment itself. Following the planned review of the Commitment on its second anniversary by our Advisory Board, we added a fourth principle of Keeping Customers on Supply to the existing three principles of Innovation, Collaboration and Accessibility. We also added new sub-commitments including a requirement to drive continuous improvement in digital accessibility.

Energy suppliers do a great deal for customers in vulnerable circumstances, both for those in financial hardship and those with other types of vulnerability. These programmes don't make great headlines so they rarely feature in the media – which is a shame, because the more customers know about them, and are encouraged to disclose their needs to their energy supplier, the greater the chance is that they will get the support they need. This report is an opportunity for suppliers to learn from each other (and encouragingly, many suppliers have told us that they have adopted ideas from other companies which they read about in previous editions of this guide), as well as an invitation to charities, consumer groups and other stakeholders to disseminate news of these programmes and services to the customers they work with and to challenge the industry if they think there are ways they could be done differently or better.

Supplier treatment of customers in financial hardship did negatively make the headlines in 2023, over the use of court warrants to force the fitting of prepayment meters (PPMs). The resulting regulatory changes will require a further review of the Vulnerability Commitment, as some of its voluntary sub-commitments will now be mandatory requirements.

Once again, I'd like to thank:

- Gillian Cooper of Citizens Advice and Dhara Vyas of Energy UK for their tireless work as members of the Expert Panel which scrutinised participating suppliers,
- Darcy Collings and Robert Birch of Energy UK for their brilliant management of the Commitment and all the members of the Commitment's Advisory Board for their strategic input. I'd also like to thank Colin Brooks of Energy UK for steering the Commitment over the past three years.

Looking ahead, I fully expect this to be another challenging winter for customers in vulnerable circumstances. However, I am confident that the support available to them will be stronger than ever before.

Steve Crabb

Independent Chair of the Vulnerability Commitment



2. Vulnerability Commitment Key Facts

2023 Signatories

- British Gas
- E
- Ecotricity
- EDF
- E.ON Next
- Good Energy
- Octopus Energy
- Outfox the Market
- OVO Energy
- ScottishPower
- Shell Energy
- So Energy
- Utility Warehouse



ecotricity



Shell
ENERGY



We were pleased to welcome two new signatories at the start of 2023, E.ON Next and Shell Energy. This took the Vulnerability Commitment to 13 signatories, covering over 90% of the domestic UK market.

Following the company's placement into special administration, Bulb's 1.5 million customers were migrated to Octopus 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 12 specific commitments, and expert panel hearings in which participating suppliers were challenged individually over their compliance concerning three areas:

- ★ **The role of their Vulnerability Champion**
- ★ **Data collected on vulnerable customers**
- ★ **Data collected from front-line staff**

These 'deep dive' topic areas were agreed with the Commitment's Advisory Board, reflecting topics of particular concern for customers throughout 2023. 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.

This year we heard lots of great examples from signatories, which are highlighted throughout this report. In addition, this year we are 'Shining a Spotlight' on examples of support for customers in vulnerable circumstances which the panel thought was particularly exemplary.



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](#)

Dr Elizabeth Blakelock | Principal Policy Manager | [Citizens Advice](#)

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

Lauren Kennedy | Senior Policy Manager | [Ofgem](#)

David Newton | Policy Manager | [Department for Energy Security and Net Zero](#)

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](#)

Sharon Gill | Extra Support Manager | [EDF](#)

Katherine Renton | Head of Regulation | [Octopus Energy](#)

Daniel Barr | Customer Vulnerability Manager | [British Gas](#)



3. Themes

3.1 Role of the Vulnerability Champion



Independent Chair Reflection - Steve Crabb

“While all participating energy suppliers have Vulnerability Champions, there is a healthy degree of diversity in the way champions fit into the organisation and the exact roles they play.

“Some are part of the most senior leadership team (SLT) of the organisation; others may be in senior operational roles, one step removed from the SLT. Some have standing invitations to report to all Board meetings, others attend on an exception basis. Some are responsible for hands-on management of their organisations’ vulnerability strategies, while others have less granular oversight. These are not mutually exclusive, and they are not solely related to company size.”



As part of the Commitment, under the theme of innovation, every signatory must commit to:

Assign a dedicated Vulnerability Champion, at the board level or equivalent, who will be responsible for overseeing the delivery of commitments to improve service to vulnerable households.

Shining a Spotlight on – E.ON Next



E.ON Next’s Vulnerability Champion – Director of Transformation Kevin Scott – is a great demonstration of a Champion who can bridge the gap between the Board and agents on the front-line.

He has a standing agenda item on vulnerability services at monthly board meetings, a monthly meeting with the CEO and fortnightly operational vulnerability forum meetings, ensuring he is fully sighted on day-to-day challenges facing customers and able to communicate that to the company’s top decision-makers. An example of how this drives continuous improvement in vulnerability support at E.ON Next is the creation of a dedicated affordability team, thanks to Kevin’s advocacy. He has also been instrumental in embedding understanding of vulnerabilities across the whole business, not just in specialist teams in customer operations.

In this year’s panel hearings, the expert panel heard about the role of the Vulnerability Champion in embedding strategy, with an emphasis on compliance and enforcement. The panel was particularly interested in hearing how the Vulnerability Champion has raised their company’s protection of vulnerable customers at board level. The expert panel asked signatories to demonstrate practical examples of changes that had been made due to intervention by the Vulnerability Champion.

The panel was pleased to hear from all signatories about the work the Vulnerability Champion at their organisations has been undertaking to drive positive change, hearing from multiple signatories about the frequent meetings that take place where vulnerability is part of the agenda. This ensures that vulnerable customers and any emerging challenges in this space are a ring-fenced area for discussion at board level.



Following the rollout of EDF's CARE+ in 2022, EDF has deployed additional resources and invested in bespoke training for its Extra Support Teams. These teams are in place to help advise customers in the most vulnerable circumstances who need extra support. Its team of advisors have specialist expertise, knowledge, and access to additional support tools to provide appropriate and sustainable resolutions. This intervention was driven directly by EDF's Vulnerability Champion and with the EDF Customers Board support has resulted in approximately 100 additional advisors being trained over five weeks to join the Extra Support teams, with a focus on vulnerability and support. This included bespoke training such as with Pete's Dragons, a charity that focuses on how to deal with bereavement after suicide. EDF's Vulnerability Champion was also able to influence decisions that resulted in an additional £5 million support package, combined with over 40,000 hours of training for vulnerability customer support teams.

The panel also heard from Good Energy how its Vulnerability Champion enables direct consideration about where investment is made. This resulted in Good Energy hiring additional staff for teams to handle prepayment customer queries directly, including having the resources to personally assess their prepayment customers to see if any vulnerabilities may make a prepayment meter no longer safe, or the preferred method of payment for the customer.

Outfox the Market has also been able to increase its staffing resources, as a direct result of board approval, driven by the Vulnerability Champion. This included hiring a dedicated Head of Contact Center, Head of Operation, and a Compliance Manager.

E also received board sign-off in bringing forward the prepayment to direct debit price alignment for its prepayment customers, receiving an increased budget to ensure all Energy Bills Support Scheme (EBSS) vouchers could be sent by post to maximise redemption rates, as well as increasing the number of call centre staff to support the continued longer call times and increased number of calls.

British Gas demonstrated how its Vulnerability Champion can influence decisions at board level, including committing to target an additional £10 million of budget aimed at directly supporting customers on prepayment meters. The panel heard about the process of identifying the challenges for vulnerable customers who are not able to afford to top up their meter, and that a repayable additional support credit could make their situation worse. Once board sign-off was received, British Gas was able to allocate its additional £10 million directly to vulnerable customers, such as providing non-repayable additional support credit to prepayment meter customers who needed support.

Alongside this, the panel heard how British Gas recognised the importance of increasing its budget for advertising and raising awareness about the support that is available for vulnerable customers. This includes the funding of third-party charities and organisations with expertise to engage and support underrepresented and disproportionately impacted customer groups - for example, those with disabilities.

British Gas has now committed £100 million since the start of the energy crisis to support customers through various ways. This includes the British Gas Energy Trust, direct customer support for those on prepay (including credit customers in winter 23/24), direct donations to charities which support underrepresented customer groups, and to broader initiatives such as the debt advice sector (for example StepChange, Citizens Advice Bureau and National Energy Action).

So Energy reflected on how its Vulnerability Champion, being the Vulnerability Steering Group sponsor, provides direction on how to proceed to go beyond compliance and shape the future of the energy market with vulnerable customers in mind. This has involved sharing its Vulnerability Strategy with the board in March 2023, including key themes of structure, assurance and public perception.

ScottishPower was able to increase its resources through winter and the cost-of-living crisis, including through dedicated teams that were able to focus on off-supply queries, affordability concerns and other



customers who may need additional support. ScottishPower implemented extended opening hours covering the full festive period for prepayment customers, an outbound team for off-supply customers as well as introducing permanently extended opening hours for prepayment off supply weekdays and weekends. In addition, ScottishPower created a permanent third-party support team providing direct access to ScottishPower for 13 debt and vulnerability charities across Great Britain. ScottishPower also extended its webchat option to operate 24 hours a day, 7 days a week between December and April.

Utility Warehouse told the panel how board level engagement resulted in a £1 million hardship fund for the previous financial year. The fund was used to increase financial support to write off historic debt, increase financial assistance to prevent customers from going into debt or self-disconnecting if on a prepayment meter, and set up a prepayment relief fund to offer instant support.

Utility Warehouse also increased the resources in its Ability to Pay team and increased the number of outbound contacts made so that support could be offered earlier to customers. It also received approval to increase resources in its dedicated Citizens Advice Bureau team, focusing on budgeting advice and maximising income for vulnerable customers.

Octopus Energy presented its Octo Assist fund to the panel. This is a £15 million fund to support customers most in need. It also shared other practical ways its customers can be helped, such as providing electric blankets during the winter, and a £50 incentive to book a smart meter installation.

Octopus Energy also told us about its financial assessment tool and embedded income maximization tools. Octopus Energy works alongside InBest, an organisation that aims to help people maximise their income. Customers who complete the Income and Expenditure form will be assessed for any missing benefits they may be entitled to and signposted to check their eligibility to make sure they are receiving any funding that is available to them.

As one of our new signatories from 2023, Shell Energy shared the progress made since its Chief Operating Officer was appointed in quarter three of 2022 and invested in a new team to focus on vulnerability. Since joining the Vulnerability Commitment at the start of 2023, Shell Energy has introduced many processes to benefit its vulnerable customers, including setting up referral routes from stakeholder charities, carrying out proactive contact with prepay EBSS customers, and welfare visits and visiting Money Advice Trust for call listening and training.

As part of Shell Energy's help fund, dedicated teams have proactively reached out to specific customer groups which could be vulnerable and/or struggling financially. As an example, Shell Energy proactively called hundreds of customers and provided over £640,000 in assistance. This group of customers had received the Warm Home Discount (WHD) in previous years but did not qualify this year due to changes in the eligibility criteria and had arrears on their account. Using the WHD data to locate customers not receiving WHD this year, Shell Energy matched this payment and £23 million of the help fund was allocated to this initiative.

The panel heard how Ecotricity also has monthly sessions where its customer service dashboard and reports are reviewed by the Chief Customer Officer and all domestic Heads of Departments and Managers. Through this structure, Ecotricity aims to drive improvements in training for its staff, as well as prioritising vulnerable and Priority Service Register customers in all departments. This report is circulated to all board directors and several other senior leaders.

The insight gained enables key performance metrics to be tracked for vulnerable and priority service customers, facilitating insightful and timely decision-making along with recognising good progress and outcomes for customers enabling successes and challenges to be shared to drive a customer-first culture.



The panel heard from OVO Energy about how it specifically focuses on embedding its vulnerability strategy within the organisation. This includes enabling vulnerable customers to access help, advice, and support by collaborating with third parties and providing innovative products and support services to make a tangible difference and lead change across the energy market. In last year's Vulnerability Commitment Good Practice report, OVO's Vulnerability Toolkit was highlighted, which has now been used by over 3,600 people, showing a high level of engagement.

OVO also announced a £50 million support package for customers over the winter of 2023, which included: payment holidays for debt repayment for all prepayment meter customers, a 200% increase in emergency top-up credit for customers on a prepayment meter and continued commitment to never disconnect a customer, free technology and services such as smart thermostats, electric throws, and boiler checks and a new charity partnership with the Trussell Trust to support food banks to meet increased need this winter – in addition to continued partnership with StepChange.

Alongside this, OVO focused on improving accessibility to support, launching a digital energy calculator that has been used to help prepayment customers budget for the winter. It also shared how it introduced a tiering structure to prioritise its vulnerable customers across telephony queues, complaints activity and off-supply emergency field activity. To ensure that these partnerships are as effective as possible, OVO has a dedicated Charity Support line for its partners to work with a team of specialists.





3.2 Data collected on vulnerable customers



Independent Chair Reflection - Steve Crabb - Theme 2

“There was an impressive amount of thought evident in the way companies of all sizes go about gathering and reporting on key metrics on vulnerability and seek to measure the outcomes they are achieving for customers in vulnerable circumstances.

“Many of them have formal dashboards which they use for internal reporting and feeding up to their Vulnerability Champion, and these are often reviewed by vulnerability steering groups and working groups which bring together key stakeholders from across the business, helping embed the strategy and drive the continuous improvement in support for customers which is at the heart of the Vulnerability Commitment.

“It was gratifying to see how these have evolved in parallel with each other, and we look forward to seeing how participating suppliers can use the insights from this report to further improve their practices.”



Shining a Spotlight on – So Energy



So Energy had one of the most impressive vulnerability dashboards the panel saw - not least because of the comprehensive governance framework that lies behind it.

So has a quarterly Vulnerability Steering Group attended by heads of and directors, and a monthly Working Group, composed of managers and team leaders. All departments are represented at both and slide decks, including the dashboard, are assembled for pre-reading by the vulnerability team. Its dashboard tracks vulnerabilities in isolation and in conjunction with complaints or payment plans associated with Priority Service Register accounts. This allows So to prioritise these customers’ queries.

This dashboard is used as a live document, allowing for things to be added in or taken out depending on what is seen as useful at the time. The dashboard is owned by the Head of Customer Care, who is responsible for monitoring and tracking trends, with the dashboard remaining visible to team leaders and managers. Once trends are identified and flagged, teams are approached to collaboratively work and try and figure out why this trend is occurring, and what can be done to prevent this moving forward. Before this dashboard, process improvements were made via qualitative data collected via online surveys. The vulnerability dashboard now allows for a collective view of data to reveal new trends. An example of this is So Energy collaborating with MENCAP, a charity for people with learning disabilities, to create an easy-read guide and video on ‘how to understand your energy bill’ and ‘owning a smart meter.’

The expert panel asked signatories to present which data and KPIs they collect around their vulnerable customers to inform and continuously improve internal processes. Part of the Commitment includes the identification of vulnerable customers, and so the panel was keen to hear how different data sets are being collected to meet these requirements.



The panel heard from all suppliers about the importance of collecting data about their vulnerable customers, so they can monitor and observe trends, as well as identify any areas for improvement.

An example of this is using the data directly collected from customer interactions to enable any trends or concerns to be identified, which can then shape the type of training required by front-line staff.

Ecotricity presented to the panel how it has updated its Customer Relation Management (CRM) system, allowing for data and insight to be collected daily and how improvements mean that any data collected can instantly be entered with a vulnerability flag if necessary. Ecotricity demonstrated how it was able to achieve a high percentage redemption rate on the EBSS vouchers due to having a good understanding of its customers' circumstances, and therefore how it could best support these needs. Ecotricity made sure that live data and regular updates were shared with its teams to track ongoing uptake. This was done alongside Ecotricity's direct engagement with Paypoint, resulting in information regarding the EBSS vouchers being placed on top-up receipts. Ecotricity also ran a postcard campaign for customers who had not redeemed their vouchers.

By using data and technology, ScottishPower can support its vulnerable customers through monitoring, identifying, escalating, and implementing changes. These improvements feed into a wide cross-section of KPIs that are monitored, such as trends in payment methods, trends in movements and sign-ups of the Priority Services Register, uptake of support offerings (including its hardship fund), and third-party support signposting. ScottishPower also confirmed it has been using new technologies, including automated speech recognition to capture information from customers and customer service agents to help present solutions and options to resolve customer queries as efficiently as possible. ScottishPower showed the expert panel how its live chat feature is set up, so customers can interact with it and easily get information specific to their query. The live chat feature can also signpost and provide other information, as well as offer a prioritised escalation option to a live agent if required.

The technology ScottishPower is using is evolving, with the further introduction of Assisted Customer Conversations (ACC). ACC analyses agent and customer conversations during the call, enabling rapid detection of the topic of the query by picking up keywords and phrases. This is being used to present solutions or options to the customer's query. This speech recognition engine can transcribe many calls at once, and through listening allows prompts to agents, delivery of auto notes and the ability to quality assurance check all calls and provide insight into these interactions. ScottishPower continues to review its opportunities to enhance and optimise the support solutions for its agents and customers, with many more deliveries planned on its roadmap.

As mentioned in section 3.1, British Gas can allocate an additional £10 million directly to vulnerable customers, ensuring that customers on prepayment meters can remain warm and safe during the winter months by providing non-repayable additional support credit. To ensure that the right customers were being targeted for this support, British Gas deployed open banking to ascertain a customer's position, showing the importance of data to identify these customers. British Gas is continuously reviewing this process to ensure it is supporting the correct customers.

Many suppliers shared how self-disconnection data is used as a key metric for vulnerable customers. Different suppliers shared their different processes that follow a self-disconnection notification, including proactive attempts to contact customers.

The panel heard how E proactively contacts customers who have self-disconnected prepayment meters and are on the Priority Services Register, by the following morning. Customers are encouraged to contact E on its freephone number for support. E also mentioned to the panel how it is collecting data about customers who



are disconnecting frequently (more than four times a month) and is using this data to identify customers who may need additional support or be in a vulnerable situation. These customers are being actively contacted by a specialist team and the conversations are helping to determine further support that customers in these situations may require.

Many signatories also monitor complaints as a key data indicator, specifically those customers on the Priority Services Register. This data is used to identify trends, taking multi-team approaches to focus on how to improve and avoid repetitive complaints. E also has a weekly complaint meeting to discuss open complaints and work on a plan to discuss what processes can be done to improve the specific issues raised by the complaint.

Octopus Energy told the panel how it created an innovative Balance Forecast Tool. It provides customers with a visual online aid to show how monthly payments are reviewed based on their actual usage. The tool allows customers to visualise what their energy balance may be based on changing their monthly payments, enabling them to better manage their bills.





3.3 Data collected from front-line staff



Independent Chair Reflection - Steve Crabb - Theme 3

“Customer-facing teams are critical to ensuring that suppliers continuously improve service to customers who need additional help: their insights into what customers need, and how well-existing policies, procedures and services are meeting those needs, are invaluable.

“With staff increasingly working remotely since COVID, and teams often existing virtually, and with offshoring and outsourcing still a major component of service delivery, companies have had to find ways to ensure that those insights are respected and valued, captured, analysed, and acted upon effectively and promptly. Our panel hearings and Request for Information (RFI) found that participating energy suppliers are responding to these challenges using a combination of leading-edge technology and innovative use of some more traditional techniques.”



Shining a spotlight on – EDF



The panel was also very impressed with how EDF has been using Artificial Intelligence (AI) to help front-line advisors support customers who need extra help.

EDF has developed technology that identifies key phrases that may indicate the most vulnerable customers. This could include customers who have a direct risk to their well-being, vulnerability, or in more extreme cases, their life. EDF showed how these customers are then directly routed to its Platinum Line Team for a prioritised response. EDF aims to provide vulnerable customers with dedicated, sensitive, and instant support. The key phrases used to identify these customers were developed with the expertise of the Virtual Contact Centre, using its own customer data and messaging conversation history. The advisors in this team are provided with specialist vulnerability training, ensuring customers receive sensitive and appropriate support. As of June 2023, the percentage score for queries being resolved during the first contact was 82%. EDF is looking to continuously improve with the AI team, working constantly to review any new data that comes through from customer interactions.

Following on from hearing about the data signatories collect around their vulnerable customers, the panel also wanted to hear how data is collected from suppliers’ front-line advisors to improve customer service. The panel were keen to hear about the feedback loop, and how this ensures that this data is used to improve standards for vulnerable customers.

Suppliers have experienced an unprecedented number of calls, with increasing complexity, resulting in mounting pressure on the front-line staff who interact with these customers daily. The panel heard from signatories about the extremely difficult conversations that front-line advisors have had to handle, and how their teams have been able to rise to this challenge. Examples include how teams support each other through additional training and mentoring, as well as providing opportunities for front-line staff to feedback about their experiences.



The importance for all front-line staff to have access to the resources they need to respond to customers in vulnerable circumstances was raised by all signatories, including how to look for signs that a customer might be vulnerable, knowing what solutions are available based on individual customer needs, as well as how and when to signpost the customer to any additional support.

A recurring theme that the panel was pleased to hear this year was around how suppliers were able to collect live data from their front-line staff, for example by using messaging platforms or live forms. Signatories told the panel how the use of these channels allows for teams to instantly raise any concerning trends from their interactions with customers, which feeds into identifying the areas of training that staff would benefit from to best support these customers.

The use of these technologies also provides an opportunity for instant responses to be given to front-line staff if they find themselves in need of support. Octopus Energy told the panel how these channels allow queries to be answered live by specialised teams who are trained in the relevant department. This ensures that customers in vulnerable circumstances who may have complex, individual needs can receive an efficient resolution to their queries when speaking to a front-line member of staff.

Octopus Energy's intuitive email system can monitor the content of all emails using 'keyword' logic which may highlight when a customer could be in an extremely vulnerable situation. The email will then be flagged instantly to vulnerability experts for urgent assistance. Octopus Energy also launched its Energy Helpers programme in September 2022 completing 218,000 home visits and providing practical energy-saving advice as well as personalised measures to help lower energy usage and bring down bills. Most advice was delivered at the doorstep, but Octopus Energy's DBS-checked 'Energy Helpers' were also equipped with thermal imaging cameras in the colder months. If invited in, they were able to identify hidden draughts in customers' homes and suggest low-cost ways to close them.

Good Energy provided information about its monthly huddles that are led in its offices by the Head of Service, providing an opportunity for themes and trends from front-line specialists in the debt team to be shared. This provides staff with an opportunity to raise any concerns for discussion in a supportive environment.

E provided information on its continuous monitoring and feedback loop which feeds into senior management, facilitating process design and change when required. This includes a direct loop through from the staff 'vulnerable customer' panel into the senior team which has resulted in immediately actioned service improvements, for example, a simplification of the Additional Support Credit process.

Utility Warehouse shared with the panel how it has introduced a text feature, allowing front-line staff to instantly send a direct link to customers to its extra help page on its website. Depending on the customers' preferences, this can be sent directly via text to the customer. This feature is an example of one of the recommendations front-line staff put through the Your Voice, Your Platform interactive dashboard; a live platform where staff can share suggestions, improvements to systems and processes or any new ideas. Feedback from advisors is then logged and tracked, and changes are implemented as a direct result of their input.

By having the ability for front-line staff to be able to have their experiences recorded and analysed, E.ON Next shared how this enabled managers to identify areas which may be causing additional stress and pressure on their employees. To improve this, E.ON Next was able to set up partnerships with certain charities and organisations. It organised specific workshops with a focus on mental health support to ultimately ensure its staff feels supported and can provide the best level of support to vulnerable customers.



OVO highlighted its vulnerability segmentation, internally branded as a Priority Services Register+, where OVO is aiming to create an industry-leading optimised service focused on supporting its most vulnerable customers. By using data-driven actionable segments based on customer engagement, OVO can use intelligent routing and channel strategy to balance customer experience, value and cost.

ScottishPower gave specific examples of where improvements to its processes had been made as a direct result of collecting data from front-line staff. This includes having specialist agents to support customers with emergencies, and ensuring the most vulnerable are prioritised. Feedback was also received on improving existing communications to customers suffering a bereavement, allowing for more empathy and signposting to support. Front-line staff also provided feedback which resulted in a targeted campaign to prepayment customers with known vulnerabilities, signposting to financial assistance from the Local Energy Advice Partnership.

The panel also heard how signatories with outsourced teams ensure that an understanding of vulnerability is embedded within those teams. This was an area that the expert panel was interested in hearing about to ensure that the level of support offered to vulnerable customers isn't lower due to having teams based abroad. The panel heard from these suppliers that their outsourced teams can feed back into the same platforms as the teams in the UK, meaning that their experiences and suggestions were also incorporated into the feedback loop that ensures processes, and outcomes, for vulnerable customers are continuously improved.

British Gas also highlighted its weekly cross-level functional meeting to the panel, where all solvers, management strategy and policy teams join on one call to capture key actions impacting their customers. This is alongside having internal social media channels with dedicated debt and vulnerability pages to gain open feedback from staff. These internal, collaborative channels ensure that solvers can get support in real-time for emerging or challenging vulnerabilities and broader customer scenarios, ensuring they can deliver consistent and accurate information to their customers.



4. Next steps

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

As we move into the fourth year of the Commitment, we are aware that market conditions are very different now from when the Commitment was first commissioned.

It's important (for us) to ensure that the Commitment is reflective of the most prominent issues for vulnerable customers, and still aims to ensure that signatories are delivering the best possible levels of service to their vulnerable customers. To do this, we carried out a questionnaire, with signatories and the Advisory Board to gather feedback on the current themes, as well as the operational side of the Commitment.

Using this feedback, and through meeting with the Advisory Board, the expert panel has listened to the views of different stakeholders from across the industry to ensure the Commitment continues to evolve to reflect the market changes observed over previous years, and forecast to change in upcoming years.

We are exploring different ways in which signatories can demonstrate the innovative ways they support their vulnerable customers, as well as ensuring the specific commitments continue to show signatories going above and beyond the existing licence conditions.





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