



Vulnerability Commitment

Good Practice Guide | 2024



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Introduction

Steve Crabb

Independent Chair of the
Vulnerability Commitment

Welcome to the latest Good Practice Guide from the Energy UK Vulnerability Commitment, reflecting our findings from year four of the Commitment. This guide shows a key part of the Vulnerability Commitment's mission to drive continuous improvement in how customers who need additional help are supported by the industry, showcasing industry good practice so suppliers can learn from each other. The report process also encourages critical friends to offer challenges so the industry can continue to reflect and learn.



This coming year we have a new challenge to consider – or at least a new perspective on a challenge that has developed over time – thanks to the 2024 Ofgem/Ofwat Vulnerability Summit. That challenge is to work more closely with colleagues in the water industry, collaborating, sharing data and insights and ‘co-creating’ new ways to support customers in vulnerable circumstances. And alongside that, to seek out ways to learn from, and share good practice with, other sectors that have stepped up to the plate, such as Financial Services.

Alongside this, we have a new Government with a renewed commitment to energy efficiency and ending fuel poverty; a consultation from Ofgem on a refreshed Vulnerability Strategy; and at the time of writing, the possibility of a new Government mandate for an expanded, multi-industry Priority Services Register based on ‘tell me once’ principles.

A ‘revolution’ is simply a complete turning of a wheel. It may seem as if the wheel is back where it started when it completes its cycle, but it's easy to overlook the distance it has travelled in the process. In the 10 or more years I've been involved in consumer vulnerability and fuel poverty, it has sometimes felt as if we are still debating the same issues with limited changes. An enormous amount has changed since the Vulnerability Commitment was launched four years ago, and this year's three themes – the topics into which the Expert Panel took a ‘deep dive’ to assess how well-participating energy suppliers are honouring the principles of the Commitment – demonstrated that vividly.

Our first theme looked at how energy suppliers identify those customers who are most vulnerable and ensure they are getting the support and outcomes, they need. As Priority Service Register (PSR) numbers rise inexorably, it's more important than ever to ensure vulnerability doesn't just become a performative game of numbers and that PSR maintenance doesn't become an end in itself. As this report demonstrates, the Expert Panel was assured that suppliers are thinking deeply about this question and are alert to the risks, with an impressive range of interpretations of what ‘most vulnerable’ means in practice tailored to individual businesses and their relationships with their customers.

‘One of the striking things about suppliers’ answers is the increasingly innovative use of AI and other technological solutions to detect customers who are at risk of vulnerability.’



Our second theme examined how suppliers can be confident that customers who agree to debt repayment plans are not just able to afford their repayments when they first agree to their payment schedules but can continue to afford them amid changing energy prices and any changes to their circumstances. Again, the Expert Panel found a range of practices, with many suppliers prepared to accept minimal repayments to ensure customers can afford to fund their ongoing consumption, and others happy to allow customers to adjust the size or frequency of their payments as often as it takes to ensure their repayment plan is affordable.

Finally, the Expert Panel asked suppliers how they ensure customers on prepayment meters (PPMs) pass the Safe and Reasonably Practical test, not just when they accept a pay-as-you-go meter but throughout the whole time they live with it. The number of PPM customers with mental health issues reported by consumer groups is worryingly high; the Expert Panel wanted to know if these customers are slipping through the net at the installation stage or developing conditions later in their journey that suppliers need to detect.

One of the striking things about suppliers' answers to that final theme, as well as the other two, is the increasingly creative and innovative use of AI and other technological solutions to detect customers who are at risk, by picking up on trigger words or interpreting the sentiment of interactions. Without exception, suppliers told us they are using this technology, and other data sources, to help agents serve customers better, not to substitute for human interaction. Alongside this, many suppliers told us they were 'onshoring' their support for customers in vulnerable circumstances. Customer service teams in South Africa, India and other countries can provide excellent service, but vulnerable customers are often best supported by agents who can pick up on the nuances of what a customer is telling them.

Once again, the Commitment has evolved in the past year to meet changing circumstances. The Commitment has amended some of the sub-commitments to take account of the new regulatory obligations set by Ofgem in the wake of the PPM review, adding several new questions to our list. The Commitment has also increased the membership of its advisory board, which now includes Caroline Flint, chair of the Committee on Fuel Poverty, Dr Carolyn Snell of the University of York, a leading expert on consumer vulnerability, and Matt Cole, CEO of the Fuel Bank Foundation.

In addition to the members of the advisory board, including our long-serving members as well as the new members of this team, 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 that scrutinised participating suppliers.
- Darcy Collings of Energy UK for her outstanding work managing the Commitment over the past two years. She has been critical to its success.

I'd also like to thank the 13 energy suppliers who are currently participating in the Commitment for their hard work on behalf of customers who need extra support, Ofgem for their encouragement and positivity towards this industry-led initiative, and Energy UK for the leadership it has shown since the Commission on Customers in Vulnerable Circumstances was first conceived.

Steve Crabb

Independent Chair of the Vulnerability Commitment



Vulnerability Commitment key facts

Vulnerability Commitment 2024 Signatories

British Gas

E

Ecotricity

EDF

E.ON Next

Good Energy

Octopus Energy

Outfox the Market

OVO Energy

ScottishPower

So Energy

Utilita

Utility Warehouse



At the start of 2024, The Vulnerability Commitment was pleased to welcome Utilita to the Vulnerability Commitment. This means in 2024 the Commitment had 13 suppliers, covering more than 95% of the domestic UK market. Following the migration of the 1.3 million Shell Energy customers to Octopus, these customers were continuously covered by the Vulnerability Commitment.

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 16 specific commitments; and expert panel hearings in which participating suppliers were challenged individually over their compliance concerning three areas:

- How do signatories define customers who are considered most vulnerable?
- How do signatories ensure all customers are genuinely offered an affordable repayment plan? How is this communicated to staff and members?
- How do signatories ensure that customers with pre-payment meters do not have vulnerabilities you are not aware of over the long term?

These 'deep dive' topic areas were agreed with the Commitment's Advisory Board, reflecting topics of particular concern for customers throughout 2024. The Advisory Board meets three times 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 the Expert Panel heard lots of great examples of good practice from all participants in the Commitment. In addition to demonstrating that they complied with its [16 detailed requirements](#), all 13 signatories also demonstrated compliance in the answers provided to this year's three themes.

While all of them satisfied our requirements, three particularly impressed the Expert Panel across all three themes: Scottish Power, EDF, and E.ON Next. Their examples will be highlighted throughout the report.



Vulnerability Commitment Advisory Board

Steve Crabb | Independent Chair | Energy UK Vulnerability Commitment

Dhara Vyas | Deputy CEO | Energy UK

Lauren Kennedy | Senior Policy Manager | Ofgem

David Newton | Policy Manager | Department for Energy Security and Net Zero

Caroline Flint | Chair | The Committee of Fuel Poverty

Ed Dodman | Director | Energy Ombudsman

Matt Cole | CEO | Fuel Bank Foundation

Alexander Belsham-Harris | Head of Energy Consumer Markets | Citizens Advice

Matt Copeland | Head of Policy and Public Affairs | National Energy Action

Lee Healey | Founder/CEO | IncomeMax

Professor Carolyn Snell | Professor of Social Policy, School for Business and Society | University of York

Grace Brownfield | Head of Influencing and Communications | Money Advice Trust

Steven Donovan | Consumer and Vulnerability Lead | OVO Energy

Joshua Field | Regulation Manager | So Energy

Catriona Dickie | Regulation Manager | ScottishPower



Themes

1: Defining and identifying the most vulnerable customers

During this year's hearings, the Expert Panel was pleased to hear about the continued work that Commitment signatories do to identify and support their vulnerable customers.

The Expert Panel chose this theme, following discussions with the Vulnerability Commitment's advisory board, because of the increasing number of customers who are eligible for the Priority Services Register (PSR). The Expert Panel was keen to understand how suppliers seek to identify those customers who are most vulnerable and may need immediate support and ensure the right outcomes are delivered for those customers and households – in effect, asking how suppliers ensure they can see 'the wood for the trees' in a forest of increasing data.

As the number of vulnerable customers increases, the number of distressing calls coming into suppliers, including threats of self-harm, is also increasing. Therefore, this question also investigates how suppliers respond to these challenging scenarios.

Many suppliers told the Expert Panel that their definition of 'most vulnerable' incorporates PSR customers who are dependent on mains-powered medical equipment, have chronic physical or mental ill-health, including terminal illnesses, are elderly (85+ was often the age cited), qualify for the PSR on multiple grounds and/or have a child aged under five in the household. In some cases, financial vulnerability was overlaid on PSR eligibility to aid the identification of the most vulnerable customers, and in other cases, it was used as a stand-alone criterion.

Conversely, several suppliers told the Expert Panel that they do not use an operational definition of 'most vulnerable': each customer's risk of vulnerability is judged on an individual basis considering a range of factors (including, potentially, non-PSR information such as previous or current financial vulnerability) and support is tailored accordingly. Many suppliers explained how they try to assess the severity of the individual's situation, often through specially trained front-line staff.

As an example, So Energy told the Expert Panel how its front-line staff can flag cases where there may be an immediate risk to the customer. These front-line staff can instantly escalate the contact and alert all team leaders and managers. So Energy continues to choose not to have a specialist ring-fenced team for vulnerability as it prefers to ensure all front-line team members are trained to a high level in how to handle challenging situations. So Energy carried out training on handling cases where the customer is at risk of harm, and extra training was provided to team leaders. Alongside this, it published a step-by-step guide for staff to help provide the confidence to respond themselves and to know when to escalate certain cases.

The Expert Panel also heard from many suppliers about the importance they place on signposting to third-party organisations such as Citizens Advice and Stepchange, that can provide further support to the customer. This is seen as particularly important when it is believed that a customer's financial vulnerability goes deeper than just their energy debt. The aim is to ensure customers receive a holistic solution to their problems and can be assisted through an in-depth understanding of their circumstances. Other examples included Utilita's partnerships with Income Max, and Ecotricity's partnerships with the Samaritans, Mind, Age UK and Shelter.



Due to the complexity and sensitivity of these interactions, the Expert Panel heard from suppliers such as Utility Warehouse that it has found it helpful to ringfence certain advisors to provide specialist support. Insight from data collected on its customer calls indicated that the length of time being taken on these interactions is the main differentiating factor in delivering the optimum outcomes for customers, which has led to further investment in training for these staff. The Expert Panel heard a key and fundamental part of the training is the ability to identify vulnerabilities and handle specific vulnerabilities. Many signatories told the Expert Panel about their use of quality assessment to ensure front-line staff pick up on vulnerability indicators that can sometimes be very subtle and easily missed. Utility Warehouse also told the Expert Panel how product teams are encouraged to listen in to challenging calls, as it can help shape processes and result in customer journey improvements. Utility Warehouse now enables self-service for customers across a range of services including PSR registration, and a range of data sources is being used to drive more sophisticated customer support alongside a first-line assurance model to achieve better customer outcomes.

Utilita, which has a large percentage of its customer base on pre-payment, told the Expert Panel about the specific challenges and opportunities this brings when supporting its most vulnerable customers. With 45% of its customer base on the PSR, Utilita is working to ensure a balance that provides the same level of support to all customers who need it. Utilita uses a customer-first approach; for example, knowing that they see peaks in contact on Monday mornings, it can use this data to anticipate this by moving staff to different teams. Utilita is also offering face-to-face contact with an agent if this is the customer's preferred contact route, as well as promoting self-service through their app, where appropriate. This highlights how it is empowering the customer to choose how they engage.

Highlighted: EDF



EDF described how PSR needs codes are categorised into high, medium and low risk. EDF aims to ensure there is a clear framework that considers different levels of vulnerability across all aspects of processes. This approach allows EDF's staff to better identify who is most vulnerable and subsequently tailor support services to appropriately help customers who need it most. EDF detailed its CARE+ support packages, that target specific segmented vulnerable groups who may be most at risk. An example of this is its Fresh Start Scheme, aimed at customers who have received debt advice through CARE+ support, with a high level of vulnerability in the household. This enables it to target support to identified high-risk households based on bespoke insight as well as PSR information.

Octopus told the Expert Panel how all its staff are trained to deal with customers in vulnerable circumstances, but it has been increasingly supplementing this with additional expertise, such as vulnerability specialists and an in-house team of directly employed social workers. When looking to define its most vulnerable customers, Octopus focuses on customers on the PSR as well as those on PPMs (due to the risk of disconnection), the personal impact that the individual's vulnerability might entail, and the risk that results from each customer. In support of this, Octopus trains its staff to think about a focused outcome for the customer, based on their individual needs. Octopus provided an example where it has focused on the specific vulnerability of economic abuse, engaging with Refuge (an economic abuse survivor charity) to provide in-depth training to its staff. Following this, certain staff are then each trained and identified as Economic



Domestic Abuse Champions, who can then provide support to customers identified as facing this vulnerability. Beyond this, in-house Energy Support Social Workers have been recruited with expertise in areas including children's services, adult social work and NHS provision. When circumstances of a sensitive or difficult issue are beyond the expertise of a frontline agent, they are able to escalate to the specialist team for resolution and the best advice via a dedicated support channel. In an industry first, Octopus has also installed free solar panels and batteries for fuel-poor households with significant health conditions (where suitable). Customers will have lower bills, more engagement in their energy use and security over their electricity supply.

Highlighted: E.ON Next



E.ON Next takes a risk-based approach to defining 'most vulnerable', using information from the PSR as the main identifier. Its risk matrix, which categorises the most vulnerable customers based on vulnerabilities such as reliance on mains-powered medical equipment, allows it to deploy different approaches for different customers based on their individual needs. E.ON Next detailed its partnership with TellJO, which delivers well-being assessments (with the customer's agreement) to customers in particular segments to deliver tailored outcomes. Front-line staff are grouped into teams, and specialist teams are designated to support the most vulnerable. These teams have a higher ratio of staff to customers to ensure these complex cases are handled effectively. E.ON's energy specialists are grouped into 'families' and own the customer relationship throughout the life cycle. Its most vulnerable customers are segmented and managed through dedicated specialists to ensure that the customers' circumstances and needs are efficiently met.

E detailed how data available from smart PPMs is used to monitor customers who are regularly self-disconnecting. In scenarios where the customer has disconnected four times in a rolling period, E's staff will reach out to the customer and review their account. E has also aimed to call all customers over the age of 70 who are identified as being on a PPM and reviewed their accounts, encouraging the installation of a smart meter where appropriate. E has consistently achieved its smart meter installation targets.

Good Energy told the Expert Panel how it created a team specialising in PPM issues, with specific targets around customer responses for PPM customers. The PPM team can easily identify if a customer has updated their PSR status to a vulnerability that may mean PPM is no longer safe for that customer. The PPM team would then aim to contact this customer to discuss their circumstances, highlighting other options if PPM is no longer suitable.

Ecotricity told the Expert Panel about its online support hub, which has resources to help front-line staff identify vulnerable customers as well as provide tailored support based on their needs. This includes a process to be followed if the customer is at risk of harm, and depending on the individual situation, it details how to escalate these cases as required. Ecotricity also has a configured telephone system that can prioritise any customers on the PSR. They told the Expert Panel that 98% of vulnerable customer enquiries had been responded to within two working days. Ecotricity also presented its billing platform, which has a PSR indicator flag as well as a separate vulnerability indicator. This enables staff to be more specific about the vulnerabilities, allowing for personalised outcomes to suit the customer's needs.



OVO told the Expert Panel it has a significant number of customers on the PSR and outlined its focus on ensuring that PSR registration results in the right outcomes for those customers, rather than recording customers' circumstances being an end in itself. OVO's PSR+ programme focuses on certain vulnerabilities such as dependency on medical equipment and chronic physical and mental health conditions, recognising that the intersection of PSR eligibility, financial hardship and poor energy-efficient housing can cause severe vulnerability. OVO's support includes its Customer Support package, its Extra Support package, its 'Vulnerability Guild' training for agents, and policy leadership across the industry.

British Gas presented its 'You Pay: We Pay' initiative, launched in May 2024 and the first of its kind in the energy sector, matching 100% of energy payments made by customers who need help. It used a data-led approach to identify vulnerable customers, such as PSR data, income data and credit score data as well as working with organisations such as Stepchange to help increase the number of referrals. British Gas's data analysis also identified that the percentage of applications for support from the British Gas Energy Trust from pensioners was lower than expected, and through this data was able to use its partnership with Age UK to receive insight on cohorts this initiative should be helping.

Highlighted: ScottishPower



ScottishPower also outlined how it aims to identify vulnerable customers through a range of methods, including training front-line staff to identify triggers, as well as using visits to a customer's home by its engineers and Community Liaison Officers as an opportunity to identify and feed back to the system on any potential indicators of vulnerabilities. In addition, ScottishPower detailed a new development, launched in December 2023, which allows customers to request advanced credit for smart PPMs through the ScottishPower app.

This followed the identification of a need for customers to have a more accessible route to ask for extra support, acknowledging that not all vulnerable customers can or want to call in and ask for help. Within this new process, ScottishPower identified that there is still a need for certain controls to be in place to ensure no further detriment to the customer's situation. For example, if a customer requests a larger amount than recommended, they will need to speak to a trained advisor, or if they have previously requested several advances they will also need to speak to an advisor. This allows the advisor to engage with that customer and look to find a broader solution to their circumstances.

Outfox the Market told the Expert Panel how a personalised approach is used to ensure the customer has an outcome based on their circumstances and needs, and that a key way it ensures this is through the training offered to its staff. Outfox the Market carried out a process change to ensure staff training on vulnerability was being done through lived experiences. Using quality and assessment data, Outfox the Market was able to see that through differences in its training structure, the average score of staff who received the 'andragogy' training (ie shared learning, rather than lecturing the learners) was higher than the average score (increasing from an average of 56% to 84%).



2: Offering genuinely affordable payment plans

The retail energy market is currently facing unprecedented levels of customer debt due to the rising cost of energy and the increased cost of living. As a result of this, the Expert Panel wanted to hear how signatories are ensuring that genuinely affordable payment plans are offered to vulnerable customers, and controls are put in place to ensure those plans remain affordable as customers' circumstances change – including, but not limited to, increases in the energy price cap.

Highlighted: EDF



EDF emphasised how its front-line staff are the core of its business, and the importance of equipping them with all the necessary skills and knowledge to support customers in all scenarios, including payment plans. EDF detailed how its customers and staff have access to budgeting tools and benefits calculators to assist with financial planning and maximise available resources (eg MoneyHelper/Policy in Practice/Citizens Advice). Staff are empowered to refer to trusted partners for specialised budgeting and financial advice when necessary. EDF aims to utilise internal and external data to pinpoint the traits of an effective and affordable repayment plan, helping the development of training and guidelines.

A specific example of this is using TransUnion affordability data to identify customers with 'low' affordability who may require additional assistance through tailored journeys and targeted campaigns. EDF also detailed the recent version of its CARE+ Resolution tool. This followed workshops with the staff to understand existing barriers and then used this feedback to develop an updated version of the resolution tool. In addition, EDF also uses Ask eNZO, an AI-powered assistant, that provides quick answers to any question by searching online content to find the most relevant information and links.

The Expert Panel was pleased to hear all signatories stress the value of partnerships with third parties that can help identify a genuinely affordable repayment plan for its customers. Suppliers also stressed the lengths they go to ensure repayment plans remain affordable, and the negative effect it can have on both customer and supplier if a payment plan fails.

So Energy detailed its new Customer Relationship Management (CRM) tool, that highlights key information regarding payments. For example, it will show if Direct Debit accuracy is an issue and whether there is an active repayment plan in place. This is a key way in which information is shared, empowering front-line staff to make informed decisions on a customer's repayment plan. Agents are trained to set a repayment plan for up to 18 months, with anything longer referred to a specialist collection team with additional training in managing complex affordability cases.

Utility Warehouse detailed its process that aims to ensure all customers have a sustainable payment plan. This process involves treating each customer on a case-by-case basis and providing specific training to front-line staff on setting affordable payment plans. Utility Warehouse will set payment plans with no maximum length of time to recover the balance, helping ensure the plan remains affordable over time. This is done by Utility Warehouse reaching out to customers on a payment plan to check in and ensure, among other things, that any PSR flags are up to date. Utility Warehouse also detailed how it uses Spark (an online training platform) and Albert (an online knowledge base) to support agents in setting up payment plans and ensuring these are sustainable.



Utilita highlighted that approximately 47% of its customers who are struggling to afford their bills had not struggled before. This creates a challenge in ensuring these customers are aware of the available support, resulting in a focus on ensuring staff are trained to speak to customers in a clear way that ensures a sustainable repayment plan outcome. Staff can take as long as necessary on individual contact cases, to ensure complex cases receive the desired outcome. In addition, Utilita carries out face-to-face welfare visits where it can find out more information regarding the customers' vulnerabilities and aim to reach a suitable outcome.

The approach of empowering agents was one that the Expert Panel heard across all Commitment signatories under this theme. There was also acknowledgement across the board that sometimes more complex cases need specialist support, and that front-line agents can escalate this to specialist teams as and when necessary.

Highlighted: E.ON Next



E.ON Next described how all front-line staff receive mandatory training on its struggling-to-pay policy and the journey it has designed to ensure a customer is on an affordable repayment plan. E.ON's staff will always aim to make an appropriate assessment and will signpost free debt advice as part of the customer journey. E.ON Next detailed how it uses certain data triggers such as a cancelled Direct Debit on a payment plan, and how this can be used to contact the customer to find out if their circumstances have changed and therefore impacted their ability to maintain the payment plan. E.ON Next has partnered with a range of specific charities that provide further support to their most vulnerable customers. This is achieved through specialist training, as well as direct referral schemes to provide expert support and advice to customers quickly.

Octopus reported the worrying trend of seeing customers who would previously have considered themselves to be comfortable, now dealing with affordability challenges for the first time – and is recognising the importance of signposting on all its communications capturing this early in the debt journey. Acknowledging that there is an important group of customers who want to address affordability challenges but may not wish to engage with their supplier on the phone, Octopus enables its customers to set up an immediate repayment plan online for up to 12 months. If more than 12 months is needed, they will need to speak to a member of the specialist Affordability teams. Octopus front-line staff get notified if payments are missed and can use data such as usage from smart meters to identify if circumstances may have changed.

Based on this data, front-line staff can outbound contact the customer to find out further information about their circumstances and if there have been any changes. If a customer needs a longer-term repayment plan, Affordability Specialists can access additional tools to provide extra help. Beyond this, if the Affordability Specialist feels the customer's circumstances require additional support, the account can be moved to their Credit /Sensitive Care Teams, trained on recognising and identifying vulnerabilities. Routing of the accounts is determined by the PSR flags on the customer's account, with Do Not Install customers routing into Sensitive Care. However, all agents are trained to handle vulnerable accounts as customers may have vulnerabilities or life-changing circumstances they have not yet shared.



All E staff are trained and able to offer additional support credit. Any payment plans offered to customers are tailored to their requirements. E reported that it has a lower average weekly repayment amount and a lower average repayment period for Additional Support Credit compared to the industry. E highlighted the importance of its partnerships with the Fuel Bank Foundation and IncomeMax, and its work to ensure that these two partnerships are joined up to provide holistic support for the customer.

Highlighted: ScottishPower



ScottishPower presented its enhanced systems to guide agents through the journey of agreeing a payment plan with a customer, and providing additional support where appropriate, highlighting the importance of front-line staff being able to obtain key information from customer conversations. The development of these systems is a direct result of feedback from agents and customers. Scottish Power also demonstrated its new insights tool, CCAi. This uses AI to translate customer calls into text and identify the sentiment of the call through keywords used by customers in addition to as picking up on the tone in which they are speaking. This allows for a greater insight into terminology and language used by customers, helping to further improve recognition.

In addition, it provides insight that enables a deeper understanding of the underlying reasons for customer contact and a more efficient review process, making it possible for Scottish Power to complete more customer-level analysis. CCAi will also provide a better understanding of the end-to-end customer journey and support the identification of further system improvement opportunities. Scottish Power reiterated that AI is not intended to replace its human customer-facing staff, rather provide real-time support and personalised, guided journeys that ultimately result in improved customer experience.

Good Energy also highlighted the ability of any of its teams to approve a payment plan lasting up to 12 months, and the challenges associated with defining financial vulnerability. To ensure customers are receiving accurate and efficient advice, Good Energy quality assures these calls, focusing on how well agents are picking up indicators of vulnerability. Through this process, if it is flagged that front-line staff are missing these hints, it will be escalated to their team leader and the agent will repeat the relevant training. To monitor the payment plan, Good Energy uses outbound calling, and front-line staff can receive low-credit alerts and frequently review active payment plans.

Ecotricity highlighted its use of income and expenditure forms when a customer is unsure of how much they can repay over what period. They can then accept financial information from a third party which is supporting the customer in whatever format this information has been collected. Ecotricity will check in with a customer on a payment plan at a minimum of six months, and in some cases sooner. This is to check whether the payment plan is still suitable, or if there are any changes in the customer's situation. Ecotricity focused on the importance of its communications and reviewed its communications to ensure they were written in a supportive tone. When agreeing to a payment plan, Ecotricity informs the customer of the importance of letting them know if their circumstances have changed and the plan becomes unaffordable. Ecotricity promotes their different communication channels on these communications, including its freephone number for customers in financial difficulty.



OVO outlined the changes seen in its payment plan journey after data analysis towards the end of 2023 indicated that its percentage average of payment plans was much lower than the industry average. As a result, it focused on improvements to customers' payment plan journeys, with the result that in the first half of 2024, the number of payment plans increased by five times. OVO compared the limitations of its previous policy, such as the maximum time length and inability to set up another payment plan if one was broken, in contrast to its current policy that allows arrears to be spread over a maximum of nine years (with an income and expenditure review).

To ensure these policy changes were reflected in customer service, OVO took all front-line staff offline for two days of upskilling training to help agents understand a customer's financial situation. It also detailed its capacity to trigger tailored communications depending on individual customer circumstances. OVO also highlighted its partnership with Money and Mental Health Policy Institute, designed to assess and improve communications sent to customers who may be experiencing mental health challenges.

British Gas identified the importance of the customer making informed decisions in the first instance to ensure a payment plan is set at an affordable rate, aiming to enable this through clear and meaningful communications with its customers. British Gas has partnered with Cowry Consulting to review and improve debt communications using a behavioural science approach, and has also been using an AI coach to help its agents. This allows front-line staff to practice conversations, with the AI Coach picking up on certain factors such as tone of voice. This allows front-line staff to put their training into practice before handling customers' queries and helps them grow in confidence to manage these often complex and challenging cases. To monitor payment plans, British Gas keeps track of missed payments and encourages customers at the point of setting up payment plans to try and keep communication open, making it clear they can be flexible if aware of any changes in circumstances.

Outfox the Market highlighted the importance of making sure customers' accounts are up to date and correct, explaining that they ensure this through frequent account health checks. These include checks that billing is accurate, with promotion of the importance of up-to-date meter readings and the benefits of smart meters. Outfox the Market's front-line staff are encouraged to be as flexible as they can when setting up payment plans, guided by a detailed questionnaire that takes them through different scenarios. There is also an embedded three-point check that ensures the agreed payment plan is sustainable: it is first reviewed by the collections team, then reviewed with the customer to ensure they are on track and able to continue with the agreed plan, before a final check to confirm that the payment plan is being met or if further support is required.

3: Staying aware of prepayment customers' vulnerabilities

The third theme reviewed by the Expert Panel this year was based on similar principles to the second: it looked at how energy suppliers ensure it continues to be safe and reasonably practical for customers to be on PPMs, and how they ensure customers' circumstances haven't changed over time, causing vulnerabilities that weren't detected before. One signatory does not have any PPM customers at present, and so it was asked about the detection of changing circumstances and characteristics more generally over time.



So Energy has a smaller PPM customer base than most suppliers. They explained that they can engage with these customers relatively easily, sending out annual reminders to customers registered with the PSR to ensure details of their vulnerabilities are up to date. Staff are trained to mention the PSR in all conversations with customers on PPMs, and they have a dedicated team assigned to reach out to PPM customers regularly to ensure prepayment is still the right option for them.

Highlighted: EDF



EDF detailed how PPM customers are now ringfenced, with all customers routed to its dedicated PPM team. Front-line staff are asked to focus on customer experience and quality, noting that these conversations can take more time and therefore may make other key performance indicators such as the number of calls taken an ineffective measure of performance. It detailed how information is gathered from its teams about how its CARE+ tool could be improved, allowing processes to be directly affected.

EDF acknowledges that its PPM customer base is one of the least engaged customer portfolios, so it has focused on trying to improve its communications to this specific customer cohort. It also detailed how AI is used to identify and support vulnerable customers, expanding the ability of its chatbot to identify a wider range of vulnerability. EDF ensures all cases are still checked by a human, with the AI's main purpose being to identify and advise rather than decide outcomes.

Utility Warehouse also has a dedicated PPM team which reaches out to customers who may need support. Front-line staff are trained to converse with PPM customers to identify any vulnerabilities and complete checks to ensure a PPM remains the best option. All high-risk PPM Ecotricity customers receive quarterly checkups to see if the customer is still suited to PPM, if not alternative options are discussed.

Utilita also aims to speak to PPM customers regularly and focuses on ensuring PPM customers can speak to someone when necessary. Utilita's data analysis indicates that these customers tend to move property more often, so it works closely with local authorities and housing associations to try to capture any potential vulnerabilities. When a customer requests additional support credit, staff are trained to ensure a Safe and Reasonably Practical checklist is followed.

Highlighted: E.ON Next



E.ON Next emphasised how all customers can now self-serve when joining, and annual letters are issued to all PPM customers to inform them of all available payment options and check if PPM is still suitable for their needs. Staff in its specialised teams have been trained on Safe and Reasonably Practical guidance and the identification of signs a PPM may no longer be the right option for the customer. If a customer is identified as being on a smart PPM and they are in an immediate risk, the dedicated team can switch them on the same day.

Octopus also trains its staff to ask PPM customers about any vulnerabilities whenever possible and check if PPM remains the most suitable choice for them. Octopus has a specialist team of 120 who are trained specifically to serve PPM customers, and staff are encouraged to offer what they think is the most suitable support.



E encourages customers to inform its staff of any changes in their circumstances at all touchpoints – whether they are a new customer or being offered additional support. It highlighted the speed with which it updated its legal basis for receiving PSR data from consent to substantial public interest, as it was aware of the potential benefits of this data-sharing workstream for customers. E also increased its capacity to respond to emails, as it noticed a rise in this method of contact and appreciates that not all customers can communicate over the phone.

Good Energy monitors PPM customers for self-disconnection or self-rationing, proactively contacting customers if they believe help is needed. This includes checks for changes in circumstances, and staff are trained to discuss alternative options.

Ecotricity has improved its opening hours and days since the beginning of May 2024. Alongside this, it frequently monitors its training to ensure it stays up-to-date and relevant based on customer needs. Ecotricity aims to provide customers with several routes of contact, encouraging staff to have conversations about their type of meter and what the most suitable meter may be for them. Ecotricity operates its Vulnerability Panel, which looks at cases where additional support may be needed. A panel invitation is extended to the staff member who referred the customer and remains open to all colleagues if they would like to learn more. The panel aims to be an open discussion that results in a tailored solution for the customer beyond what the normal process may allow.

Highlighted: ScottishPower



ScottishPower detailed processes that aim to identify any changes in circumstances, including ensuring regular customer conversations held across all channels. Vulnerabilities are suitably recorded, and certain pre-defined categories prompt agents to complete further checks. Agents can ensure PPM is still suitable through a process that provides an extra layer of control and empowers them to do the right thing for the customer based on individual needs.

ScottishPower is also trialling – with approximately 40 agents – the use of AI to support agents in recognising changes in vulnerabilities or circumstances when drafting customer emails. An instant summary of an email contact is provided, highlighting the key sentiment and tone, summarising key themes, then proposing actions. Agents have fed back positively, feeling it helps them provide enhanced quality of response with details specifically tailored to the account, and ScottishPower is next looking to use this technology for calls. All AI-based tools have been developed in-house.

OVO detailed its use of Safe and Reasonably Practical assessments to enable routine checking of customers' circumstances and PPM suitability. While the current license conditions state these checks are to be done annually, OVO has given its staff the autonomy to do this as needed. OVO runs an annual campaign to identify PPM customers who have not had a Safe and Reasonably Practical assessment and sends tailored communications to these customers with a direct link to answer these questions. OVO's teams are then able to identify which customers have not responded to these communications, and outbound dial these customers. Through this process, they have had 32,000 customers complete the assessment in the last six months.



British Gas focused on the importance of its communications with PPM customers, including the information left behind at the customer's home after installation. It now also undertakes an annual proactive prompt, checking in with the customer to ensure PPM is still suitable for them and promoting the PSR. British Gas reported that it now advertises its free 0800 number on more communications than ever, aiming to encourage customers to get in touch to discuss any changes in circumstances. British Gas' recent migration process has focused on the importance of trying to secure up-to-date contact details for all customers and cleanse any outdated contact data. This enables British Gas to ensure it can reach its customers, provide additional support, and find out more about their circumstances to understand if there have been any changes.

Outfox the Market presented to the Expert Panel on a different theme due to its lack of customers on PPM. Outfox explained how it tracks vulnerabilities over time across its whole customer base, not just PPM. It told the Expert Panel how it has multiple touchpoints and encourages disclosure, as well as looking out for vulnerability identification triggers. Outfox also continues to work with charities and consumer groups to try and receive up-to-date information about its customers' circumstances, allowing tailored support to be offered.

Next steps

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

Following the expert panel hearings, the Advisory Board will meet twice more this year to discuss common themes, and to discuss the future direction of the Commitment. Market conditions are very different from when the Commitment was first commissioned, and it remains important to ensure the Commitment serves its purpose of being reflective of the most prominent issues faced by vulnerable customers, as well as ensuring signatories are delivering the best possible levels of service to these customers.

Next year Energy UK will work with the Independent Chair of the Commitment, the Advisory Board and its signatories to review and update the Vulnerability Commitment to ensure it is still relevant and providing the protections for vulnerable customers it was intended to four years ago now.

This year will conclude Steve Crabb's tenure as the Independent Chair of the Vulnerability Commitment. Steve has been the Independent Chair since the beginning of the Commitment and has been crucial in developing and evolving the Commitment since the start. Steve's knowledge and enthusiasm will be missed, and Energy UK would like to thank him for all his hard work. Energy UK will be looking to recruit a new Independent Chair for the start of 2025.



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