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SSEPD Submission Document Part 3:
Consumer Vulnerability

3

**Electricity Distribution
Stakeholder Engagement
and Consumer
Vulnerability Incentive**

2015/16

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Introduction

I'm very pleased to introduce this report, which demonstrates how our engagement with stakeholders is changing our approach to identifying and tackling consumer vulnerability.

Despite the complexity of the issues facing our consumers, our main objective can be summed up fairly simply – to make our services accessible and suitable for all consumers. As a distributor of electricity for millions of people and businesses across Scotland and England, we fully embrace our responsibilities to the communities we serve, and the wider social obligations to act in a fundamentally sustainable and fair manner now and in the future.

This is particularly true of the current environment we operate in and the challenges facing consumers up and down the country. A wealthy society, but one with real poverty in both working and workless households, an ageing population, and climate change, to name but a few, are examples of the pressures on modern day society. Only by truly understanding the factors influencing vulnerable consumers can we begin to address them.

The data from our comprehensive vulnerability mapping exercise will be the main driver behind much of what we do over the coming months, helping to shape our understanding of vulnerability, thereby giving us the opportunity to do something about it. We know already that the issues facing our consumers in vulnerable positions are often different, changeable, complex and typically involve multiple interrelating factors.

We're also aware of the distinct nature of social, economic and environmental issues across both our network areas. While the north is characterised by rural, yet cohesive communities, infrastructure susceptible to adverse weather and high rates of fuel poverty, in the south, higher density populations, greater diversity and more robust infrastructure clearly demonstrates that a one-size-fits-all approach is not an option.

As a result, this year we've taken the following approach, influenced by what our stakeholders are telling us:

1. Understanding vulnerability – improving our knowledge of the social, environmental and economic challenges facing consumers
2. Identifying and engaging vulnerable consumers – improving the data we hold on vulnerable consumers and sharing that data with other organisations
3. Changing the way we operate to adapt to local circumstances – training staff, partnering local intermediaries and improving our internal work processes and procedures

One of our biggest accomplishments of the year was successfully achieving British Standard 18477 accreditation for inclusive service provision. This recognition reflects the fair and flexible service we offer, as well as the number of additional activities that are helping us deliver a socially responsible service.

That service is continuing to manifest itself across our business thanks to the development of our engagement in relation to consumer vulnerability on an operational, organisational and strategic basis, ensuring that stakeholder views are being considered at all levels of decision making.

We've also made significant changes to the structure of our business on a regional basis to ensure local decisions can be taken for local issues. I believe this new way of working is fundamental if we are to become an organisation that is fully focussed on our consumer needs and the challenges they face.

In the following pages you'll find more details of our specific engagement activities from the past year. Most importantly, you'll see the benefits this engagement has achieved for our consumers in vulnerable positions.



Colin Nicol
Managing Director, Networks



Our five strategic priorities

1. Ensure that addressing customer vulnerability is at the heart of our business strategy, our culture, our policies and all of our services.
2. Identify and respond to customer vulnerability timeously and with empathy.
3. Keep the distribution costs of our customers' electricity bills as low as possible.
4. Deliver an accessible and empathetic service to our Priority Services Register (PSR) customers.
5. Support those who become temporarily vulnerable during a power cut.

Our engagement highlights

Strategic engagement

British Standard for Inclusive Service Provision

Our accreditation recognises our services are available and made equally accessible to all consumers, regardless of their personal circumstances

Mapping consumer vulnerability

We've committed to a comprehensive mapping exercise, gathering vast amounts of data on the issues affecting vulnerable consumers

Consumer Vulnerability Panel

Our independent expert panel has been established to challenge our performance and influence the decisions we take for our consumers

Data strategy

To guide our approach to data acquisition and management

Realising the benefits from Knowledge Transfer Partnership

Identifying an implementing best practice to support our communities during supply interruptions

Organisational Engagement

Warmworks partnership

Funding energy efficiency measures to tackle fuel and wider poverty by reducing individuals' fuel bills

Working in partnership with water companies

Agreement to work together to support PSR consumers

Operational Engagement

New PSR team

16% increase in PSR registrations between September 2015 and March 2016 and improved PSR service to consumers

Embedded our consumer vulnerability strategy

Incorporated our consumer vulnerability strategy into everyday business activities, including vulnerability training for 1,024 call centre staff and 12 regional depots

Our role in society

As a Distribution Network Operator in a regulated industry we recognise our wider obligations to society extend far beyond distributing electricity to homes and businesses.

The nature of our product – providing something people rely on, not simply something that they want – places an additional level of expectation on us.

We exist to serve our consumers by distributing a safe, reliable supply of electricity to the communities we operate in.

These consist of individuals who can sometimes find themselves in a vulnerable position at any time as a result of circumstance, external or personal. Therefore, we are committed to delivering a service which we are able to adapt to the changing circumstances that real life throws at people, rather than being designed for a hypothetical customer who never experiences difficulties.

Drawing on best practice, we have changed our terminology from “vulnerable consumers” to “consumers in vulnerable positions”. This reflects the fact that anyone can become vulnerable at any time due to their personal characteristics or circumstances or a combination of both which makes it hard for them to cope or represent their interests.

Strategic Engagement

Meeting the needs of vulnerable consumers

Our accreditation against British Standard 18477:2010 criteria successfully demonstrates that we are meeting the requirements for identifying and responding to consumer vulnerability. The assessment process requires that all our services are available and made accessible to all consumers equally, regardless of their personal circumstances.

BSI noted that we’ve made considerable progress on our journey to achieving our goal of being a consumer focused organisation, particularly:

- Top management commitment to addressing vulnerability
- The extent of funding relating to the programme and initiatives to support vulnerable consumers

- The way we use feedback of various types to continually improve our services, including learning from complaints and using positive feedback and compliments from consumers to drive improvement
- The drive, motivation and enthusiasm from the sampled employees to implement the processes and initiatives aimed at protecting vulnerable consumers
- Our approach to consulting experts in vulnerability, particularly our Expert Panel on Consumer Vulnerability

The auditor noted that SSEPD is moving from an engineering-focused organisation to a consumer service focused business, positively commenting on four aspects of our commitment to addressing vulnerability:

- Protecting vulnerable people
- Focusing on individual consumers
- Increasing positive feedback relating to their activities
- Providing community champions

We believe this reflects our management commitment to a pro-active, individualised approach to consumer vulnerability. This good practice brings mutual benefits to consumers and the business.

Understanding social issues affecting vulnerable consumers

The scope and scale of vulnerability, and the fact that it is multi-layered, impacts on consumers’ resilience and ability to cope with sudden life events such as bereavement, relationship breakdown, or sudden illness. Yet many of us would not define ourselves as vulnerable and, for others, such as carers, that vulnerability can be hidden.

The economic recession and the austerity agenda have impacted on consumers across the board, affecting many who we would not have previously considered as “vulnerable”. Despite our apparently affluent society, pressures on the cost of living and affordability challenges are affecting many more people. Levels of general poverty and fuel poverty are on the rise, as well as household debt.

Changing employment patterns (e.g. short-term and zero hours contracts) and the impact of welfare reform have given rise to the new paradigm of the working poor – even if you have a job you, and your family, are more likely to be in poverty. Not enough of us have savings put aside for the future or for that rainy day.

Despite the digital revolution, many people are still offline and we still have challenging levels of illiteracy among the adult population. These socio-economic determinants are widening health inequalities and impacting on life chances and the mental health of many more people. Yet, we are living longer but with increasingly complex multiple morbidity health problems.

Mapping vulnerability

Working with the University of Dundee, we’ve developed a methodology to identify gaps in how we define and measure vulnerability. The resulting vulnerability map will help us to identify demographics and key social issues within the communities we serve. It will highlight the differences in outcomes and opportunities experienced by people in different communities, such as health, education, community safety, housing quality, access to work and communications. This will highlight barriers they face when interacting with us to share their views on our service or access our help. It will allow us to tailor our engagement and customer service mechanisms to meet the differing needs of communities and the individuals within them.

Benefits

- Treating all consumers fairly increases trust, leading to positive outcomes
- Pro-actively identify and tackle issues affecting vulnerable consumers at the earliest possible stage prevent the same problems becoming more widespread. Improving services in this way will avoid the cost of complaints
- We understand the dynamic nature of consumer vulnerability – consumers can move in and out of vulnerability – and we adapt their services to meet individual needs as a result

Acquiring, using and sharing consumer vulnerability data

Strategic Engagement

Our approach to acquiring and managing data

To speed up the process of agreeing data sharing protocols, this year we've examined which of our data sharing partnerships are working well and how to reassure consumers and partners that all aspects of the Data Protection Act have been considered. To do this, we've set up an overarching strategy to guide our approach to data acquisition and management.

Our most successful data sharing partnerships occur in emergency situations. Under the Civil Contingencies Act 2004, we share data to help plan our responses to support consumers who become temporarily vulnerable during power cuts. We aim to develop data sharing protocols to enable effective referral processes to energy and non-energy related advice over the next 12 months.

To safeguard our PSR consumers, whenever we identify or receive proposals to become part of a data sharing relationship we follow our new data sharing protocol procedures. These help us to fully understand and identify the risks of sharing data and decide if this is a partnership we should progress. We do this by:

NEW

- completing a Privacy Impact Assessment, comparing the objectives of the data share with the privacy rights of individuals. It also provides a record of the outcome and impacts expected for the individual
- determining the legal basis for sharing data eg format and level of data which will be shared
- ensuring that all data sharing protocols use a common methodology to help us prioritise which organisations we share data with
- standardising the items which will be addressed in any formal data sharing agreement, including review dates and termination of agreements

Cost

7 days' staff time

Stakeholders

Our data sharing partners

Dolby Vivisol
British Gas

Category 1 Resilience Partners

- Local authorities
- Police, fire and ambulance services
- Health Boards (includes Social work)
- Scottish Environment Protection Agency
- Maritime and Coastguard Agency

Category 2 Resilience Partners

- Electricity Operators
- Gas Suppliers
- Scottish Water
- Communications Providers
- Transport operators
- Harbour Authorities
- NHS National Services Scotland
- Health and Safety Executive

Other Resilience Partners including:

- The military
- The Crown Office and Procurator Fiscal Service (COPFS)
- Transport Scotland
- Commercial organisations
- The voluntary sector (e.g. British Red Cross)

Benefits

This policy has informed the data sharing partnerships we have entered into this year

Strategic Engagement

Industries working together to build better PSR registers

To share vulnerability data and support services across the energy industry, we've worked with the Customer Safeguarding Data Sub-group, consisting of DNOs, Gas Distribution Network Operators and suppliers, to improve data flows between companies. This followed our successful trial, the first DNO to do so, of a two way flow (D0225) of PSR consumers' data with British Gas, and we are now building on this approach with other suppliers.

There are many similarities in the types of vulnerability which are recognised and defined by regulators and organisations across the utilities industry. Working with Scottish Power Energy Networks, we have met with Scottish Water and SGN in Scotland. Together we reached an agreement that there are enough similarities between classifications of vulnerable consumers in our PSR needs codes for us to be able to work together. We hope that two way data sharing between the companies who hold PSR registers will be a long-term outcome.

Anticipated short to mid-term outcomes include:

- signposting consumers contacting us by internet, phone or social media to each others PSR register

- targeted joint leaflets and campaigns to promote PSR to trusted intermediaries such as GP surgeries, hospital units and social workers to raise awareness of distributors and water company services and benefits to encourage eligible consumers to register
- where partners are undertaking major works in a community, we will jointly hold events to allow consumers to find out more and also to enable specialised local support for consumers in vulnerable positions as a result of loss of electricity, gas or water supplies

To transfer this successful approach to our SEPD area, we have arranged a meeting with SGN and water companies.

Cost

5 days' staff time

Stakeholders

- Scottish Power Energy Networks
- SGN
- Scottish Water, Southern Water, Thames Water, Portsmouth Water, Wessex Water and Bournemouth Water

Benefits

We anticipate more PSR registrations through joint communication plans

Operational Engagement

Addressing PSR data gaps

Our research and training programme has emphasised the importance of correctly identifying and recording vulnerability to ensure we cater for individual needs, which is why we've been concentrating on improving our PSR data.

When we compared the distribution of registered consumers on our PSR needs codes with UK statistics (e.g. 1.4 million people in the UK aged over 85¹) they correlated well, validating our PSR recruitment approach.

Trusted intermediary bodies are an important and efficient way of reaching out to seldom-heard or 'hidden' consumers.

Benefits

We have been closing the data gap by focusing on identifying partnerships with trusted intermediaries who are able to help us connect with groups of consumers that we can offer support to through our PSR (see page 7).

¹ Financial Conduct Authority 2015

Acquiring, using and sharing consumer vulnerability data continued

Operational Engagement

Data information and updating strategies

Our PSR consumer data is integral to our objective of placing our consumers at the heart of our business. Accurate PSR data enables us to be more efficient and responsive in supporting consumers in vulnerable positions, because we are able to prioritise who we help first and the level of assistance we give them.

We data cleanse our PSR data through:

- Call centre staff checking with each customer, we contact or who contact us, if our information is accurate, and update it accordingly. Moderator sessions review this aspect of their call as part of their performance review and our database now records the number of times that records have been checked and updated.
- Suppliers provide a D0302 dataflow and we check this daily and update PSR markers where consumers have moved address. This means that we don't bring consumer safety into jeopardy due to wasted time contacting consumers who no longer require our services at the expense of those who do need our service.
- We have prioritised cleansing new PSR registrations where consumers have identified themselves in the 'other' category to move them to a more appropriate marker in recognition that this will improve the service we offer them as individuals.
- Over the past seven months, we have contacted 3,853 consumers who we haven't reached through any of the approaches above to check the accuracy of the information we hold.
- To improve the accuracy of PSR data captured by staff, when they are identifying and recording vulnerability, we have taken time out to help them to understand what types of vulnerability are recorded under each needs code.

We are in the process of establishing our own internal standards and processes to cover the collection, validation, access, update, retention, privacy and protection of all personal data held about consumers to ensure that the privacy and integrity of data are maintained in compliance with the Data Protection Act 1998.

Disclosure

This was an area for improvement highlighted during the Consumer Vulnerability Trial.

Benefits

- A consistent and common methodology to determine if a data sharing partnership is in line with our strategy for acquiring and managing PSR data
- Consider the objectives of the data sharing against the privacy rights of affected individuals and evaluate the reasons for the data sharing and results sought, taking into account the privacy interests of affected individuals
- Provides a clear understanding of the format in which the personal data will be shared to ensure that each party is able to receive and process it efficiently
- Helps us identify what level of data should be shared to support consumers
- Helps us consider when parties will review the success of the data sharing exercise
- Engaging across water, gas and electricity industries to improve data held on vulnerable consumers and gaining efficiencies by working together to jointly promote the PSR
- Embedding our approach to PSR data management within our policies and procedures
- Identifying support for vulnerable consumers across water, gas and electricity industries
- The PSR data team cleanse an average of 772 PSR records per month
- Provided over 17,500 PSR registration leaflets to client bases in our network areas through trusted intermediaries
- The number of registered PSR consumers has increased to 451,490 in March 2016 (up by 16% from September 2015)

Strategic Engagement

Knowing our communities

Informed by our Knowledge Transfer Partnership with the University of Dundee, we now have a solid understanding of how consumers cope in the event of a power cut and how we can improve the service we offer vulnerable consumers at this time.

We learned that vulnerability:

- isn't just about one characteristic, such as having a chronic medical condition or a disability
- varies with location, time, social, cultural factors, the individual's characteristics and also political and situational dynamics

- depends on how all these factors combine at any given point in time

To assess and measure vulnerability we must consider these aspects in a geographical setting to help us understand the communities we serve. We feel that this learning can be applied whether there is a power cut or not.

To help us achieve this we commissioned the University of Dundee to develop a vulnerability mapping methodology which will help us to define and measure 'vulnerability' in our network areas. However, a map of how the communities we serve is not helpful unless we are able to convert it into data packages which operational staff can use as part of their job. This will allow us to respond better to the needs of consumers in vulnerable positions at a local level.

In practice, we will use the study to inform how we communicate, support and engage communities in the design of services we offer but also the way in which we manage the network. It will also allow us to identify what wider social issues we need to be supporting in each region and develop local energy and non-energy partnerships to address these.

The methodology differs in our SEPD and SHEPD areas due to the way that government data is gathered and the density of populations. The methodology will be used in our procurement exercise to map vulnerability in our network area in May 2016.

Cost

£4,500 to develop the methodology

Benefits

- A cost effective tool for SSEPD staff which produces an easily understood vulnerable consumer typology within each region
- Provides information on how best to communicate and engage with communities
- Highlights where we need to promote our PSR to eligible consumers
- Highlights social issues within the communities we serve to help us identify which ones we feel we have an active role in tackling
- Target areas where there are gaps in support for consumers in vulnerable positions and where we can start to identify partnerships to address these. For example our partnership with Warmworks (see page 8), helping fuel poor consumers to reduce their energy bills

Acquiring, using and sharing consumer vulnerability data continued

Operational Engagement

Training in recording, identifying and understanding vulnerability

In order to provide a fair, inclusive and responsive service to all consumers, we've trained 1,024 front line staff from call centres and 12 regional depots to recognise signs of vulnerability, identify individual needs and offer appropriate solutions.

Our training, in line with the Direct Marketing Agency White Paper on Vulnerability, encourages staff to adopt a very wide definition in assessing whether consumers are vulnerable (physical, emotional, financial and/or circumstantial) and empowers them to do the right thing.

Following training, staff can access guidance notes with prompts around the support we can offer, when it should be used and how to action it. During power cuts this includes the location and contact details for our welfare facilities.

The training is supplemented by monthly awareness days in partnership with key external organisations such as Age UK and Macmillan Cancer Support, enabling our teams to learn from industry best practice.

We keep our training constantly under review and have already updated it to reflect the influence that geography has on vulnerability and also its transitory nature. Field staff were often unaware that we had a team to help coordinate extra support, so we have used that feedback to focus on the support which can be offered to consumers through our PSR team.

Our training has been reviewed by our Expert Consumer Vulnerability Panel and independently assessed by Dr Irena Connon, University of Dundee "Overall, the training course was impressive for its focus on empathetic skills development and for its focus on enhancing abilities to 'think outside the box' and exploring the complex dimensions of vulnerability...".

Cost
£15,000

Stakeholders

1024 front line staff from call centres and twelve regional depots

Benefits

- Changing the culture in the field: Manager's report has encouraged staff empathy and has helped to reduce complaints
- During live faults we have increased the presence of staff who can provide additional support to those who have become temporary vulnerable e.g. welfare checks, hot drinks and rest centres, friendly presence
- Depot clerks notify Customer Community Advisors for local and personal response to consumers who find themselves in vulnerable positions
- Our staff feel empowered to treat consumers as individuals

Commentary on Benefits

The vulnerability training has had a really positive impact on operational staff. Feedback shows that this has considerably improved the behaviours of those who had the training, and observations show they are doing more to look after the needs of consumers in vulnerable positions.

Organisational Engagement

How data is already informing our partnerships around energy and non-energy help

- Cancer Research UK estimate that every two minutes someone in the UK is diagnosed with cancer. Therefore we have held staff awareness days, in partnership with Macmillan Cancer Support, to highlight the help available to consumers who are suffering from or affected by cancer.
- Age UK surveys have shown that one in four people aged 65 and over feel they have no one to turn to for help and support. Through Age UK's Call in Time scheme 16 members of our front line staff have befriended 16 elderly people through weekly hour long calls they make during working hours. Some of these friendships are so strong that our staff chose to call their elderly friend on Christmas day².
- In our Highland Region we are tackling high levels of unemployment by opening our depot as a place for the Calman Trust to operate a café which focuses on harnessing the capabilities and enthusiasm of young people in the Highlands to help them move into employment and become active contributors to society, in turn helping to strengthen their local community.

Benefits

- Effective local partnerships targeted around communities needs
- Targeted local communication and engagement strategies
- Target areas where there are gaps in support for consumers in vulnerable positions and where we can start to identify partnerships to address these

² In recognition of the inconvenience and disruption caused to customers and following discussions with Ofgem, SEPD donated £1million to various charities including Age UK. The 'Call in Time' scheme was funded from part of this donation.

Priority Services Register: supporting vulnerable consumers

Operational Engagement

Eligibility and take up of the PSR

Our industry uses 21 core needs codes to describe groups of consumers who require additional support. We have created four additional needs codes tailored specifically to consumers who found themselves in vulnerable positions in our network areas.

Our networks have been battered by severe weather over the last three years with hurricane force winds, torrential rainfall and extensive flooding causing some consumers to lose power for extended periods. We needed to respond to this not only as engineers but also as an organisation that is committed to the safety and wellbeing of our consumers. This has led to us identifying four needs codes outside the core groups in order to allow us to adapt our service to the needs of consumers:

- Young Babies under 12 months: we introduced this code in 2013 after a large number of new families identified themselves as struggling to cope with dramatic changes in their lifestyle. When combined with the experience of a power cut they became very distressed and worried about how to keep their baby warm and fed.
- Hospice/Residential Home: we introduced this code in 2014 to allow us to warn and inform hospices/residential homes in advance of bad weather which may result in power cuts so that they can make contingency plans to support their clients. We have also delivered workshops, in partnership with NHS, to representatives from 49 care homes to help them develop business continuity plans this year.
- Temporary Conditions: we adapt our service to the changing circumstances that life throws at consumers (e.g. bereavement, palliative care, or if their home has been flooded) and so we introduced this code in 2014. This marker lasts for 12 months at which point it is automatically flagged up to the PSR team who contact the consumer to discuss their circumstances and assess the support they need.
- Life support equipment: included in 2014 to reflect the essential nature of the equipment so that we can prioritise support to these groups in the event of a planned or unplanned outage.

Operational Engagement

Promoting the Priority Services Register

We carry out basic recruitment of eligible consumers by promoting our PSR service through consumer-facing service teams who have had training in identifying, recording and responding to vulnerability (e.g. our contact centres, front line field staff and through our stakeholder engagement programme). We also refer to the service at public and one-to-one meetings, within press releases, our website, our social media channels and through our PSR leaflets and posters. The messaging details eligibility and the key benefits of our free services.

Our Annual Survey of Domestic Customers showed that awareness of our company and our service is very low amongst large swathes of the population – indicating that they are less likely to know how to contact us in the event of a power cut.

In response, we launched a significant awareness campaign between November 2015 and January 2016. The campaign included 48-hour 'get ready' alerts in advance of severe weather, as well as the extensive use of radio, print and outdoor advertising and digital media to raise awareness of who we are, how and why to contact us, and who is eligible for our PSR service.

Building on this, we now tweet daily and during public awareness raising campaigns (see Part 2 page 5). We share stories and videos on Facebook highlighting who is eligible, benefits of the service and how to register.

Operational Engagement

Connecting with hard to reach consumers

Trusted intermediaries are an important and efficient way of reaching out to seldom-heard or 'hidden' consumers. We work with them to distribute PSR registration forms to eligible customers on our behalf. Some examples include:

- DNOs placed a joint advert in the March 2016 edition of Able Magazine promoting our Priority Services Register and encouraging registration amongst disabled people.
- We shared an advert in two editions of Age Scotland's Advantage Magazine with SPEN and placed an advert in the Age Scotland calendar to promote the benefits of joining our PSR to older people.

- Age UK and Citizens Advice Scotland are helping eligible clients within our network area to register for our PSR at their regional offices.

Our vulnerability mapping study methodology will help us identify geographic locations where there are pockets of vulnerability. This will be compared with the locations of our existing PSR consumers, helping us identify strategies to increase registrations within areas where levels of PSR registered consumers are significantly lower than the number of eligible consumers. This also helps us identify the most appropriate locally trusted intermediary to help us connect with consumers and gain trust within the population (e.g. THAW in Orkney or Southampton Council).

Commentary on benefits

The 16% increase in registrations to our PSR indicates that our approach to eligibility and recruitment is cost effective.

Cost

Recruitment cost per newly registered PSR consumer is £0.05

Stakeholders

- Hospital departments
- Dolby Visisol
- Local Age UK in SEPD
- Local Age Scotland, Citizens Advice Bureau and GP Surgeries in SHEPD

Benefits

- 1,807 PSR consumers registered under the four needs codes outside the core groups
- 451,490 – the number of consumers on our PSR register (up 16% from September 2015)
- Over 17,500 PSR leaflets distributed in partnership with trusted intermediaries such as NHS, local authorities, senior clubs and community centres
- Working in partnership with other DNOs, we have reached a potential of 429,000 eligible PSR customers across the UK through trusted intermediaries

Priority Services Register: supporting vulnerable consumers continued

Operational Engagement

Services offered to consumers on the PSR

Our newly created PSR team, under the guidance of our Social Obligations Manager, provides dedicated support for consumers in vulnerable positions. Our team receives extensive in-depth training to ensure that they have the additional expertise they need to assess the most appropriate solution for a consumer's situation on a case-by-case basis.

We operate a free PSR register and service which provides consumers with information and advice on how to prepare and cope with interruptions to their electricity supply. The services we offer have been influenced by our Expert Consumer Vulnerability Panel, in particular they've given us advice to help simplify our communications, making them easier to understand and act on for consumers.

Baseline services include

- Welcome packs which explain what services we can offer as well as hints and tips on how to prepare for a power cut
- Based on consumer's circumstances we provide analogue phones to ensure communication is maintained during a supply interruption (e.g. housebound or cognitive difficulties)
- We survey 10% of new PSR consumers to ensure that they can understand and act on the information we provide; or if they need it in another format
- We offer a dedicated PSR phone number so that consumers can get straight through to an SSEPD call handler
- We offer a password scheme to consumers as reassurance that they are talking to one of our staff members; and our photo identification cards have a number to call to check their identity
- Welfare packs are distributed in emergency situations while our basic pack is issued as standard to all of our most vulnerable consumers at point of PSR registration
- Consumers can nominate someone for us to contact on their behalf, particularly liked by consumers who have mental health conditions
- Provide any communications in an accessible format (e.g. braille, large print, audio CD, text talk, foreign language)

- Escalate calls to the PSR team in order to provide advice and help to consumers who are identified as needing extra assistance. There is no 'one size fits all' solution to the issues the PSR Escalation team handles
- Where we identify consumers at risk we refer to social services or police (e.g. where we identify someone who is disorientated and requires assistance; or may be at risk of harming themselves and others)
- Signpost consumers to appropriate third parties where we don't have the expertise to assist (e.g. medical or debt advice)

During planned supply interruptions

- Proactively call, and then write to, all PSR consumers who will be affected by the outage to ensure that they can cope and where they can access appropriate advice and assistance (e.g. consider offering a generator or postponing the interruption)

During an unplanned power cut

- Provide PSR consumers with advanced warning of weather that could result in a power cut, prioritising those dependent on medical equipment and offering advice on how to prepare, and confirm that their details and needs are recorded correctly on our system
- Where we consider consumers might not cope if the power does go off, we add them to a watch list so our PSR Escalation Team can contact the consumers immediately if their power is affected
- We also give advance warning to our Resilience Partners (Category 1, 2 and Other), Dolby Vivisol and any communities who have or are working on local community emergency plans
- Call PSR consumers back with updates on the fault and an estimated time of restoration, prioritising calls on the basis of an individual's circumstances
- Set up a PSR escalation team whose role is to take the more complex situations and understand individual's needs in order to provide the best solution based on the urgency of the situation
- Work with trusted intermediaries to deliver tailored solutions e.g. visits from emergency services, British Red Cross, social work and carers as well as our own welfare vehicles

- Deploy catering vans (or local businesses if there are road blockages or cancelled ferries) to provide hot drinks and food 24/7 where we anticipate prolonged power outages
- Deploy generators to restore power as quickly as possible

Cost

- The cost of administrating the service is £0.20 per registered consumer

Stakeholders

- 451,490 Priority Service Registered consumers
- Expert Panel on Vulnerability
- Resilience Planning Partners (see page 3 for the full list)
- 44 communities with local emergency plans in place

Benefits

- Our Annual Survey showed that 99% of surveyed domestic consumer were supportive of our PSR service, with the most commonly stated reason being "caring, calming and helpful staff"

Our partnership approach

The approach to forming partnerships to date has focussed on identifying partners who support vulnerable customers. Now it is time to take a more strategic approach informed by our vulnerability mapping methodology, enabling us to comprehensively assess need across our geographical regions.

Strategic Engagement

Fuel poverty partnership

Informed by stakeholders and Government statistics³, our flagship partnership in 2015/16 with Warmworks represents the type of partnerships we believe deliver most benefits without creating unnecessary work for us. Warmworks – a joint venture between the Energy Saving Trust, Everwarm, and Changeworks, who run the Warmer Homes Scotland Scheme on behalf of the Scottish Government – will use our donation to help the most vulnerable clients within the SHEPD area.

The scheme offers a range of energy saving measures and renewable technologies to households in, or at risk of, fuel poverty. However consumers can only qualify for help if they receive an income or disability related benefit, and their property requires energy efficiency upgrades.

The partnership closes a funding gap that prevents our most vulnerable consumers from accessing this State help to reduce their energy bills and make their homes warmer and safer.

What we learned

- Annual Distribution Survey revealed 52% of SHEPD consumers are concerned about or struggle to pay energy bills (42% in SEPD)
- 81% of respondents agreed with our proposed partnership approach to assisting fuel poor consumers
- Engagement on network investment in SHEPD highlighted fuel poverty as the main concern of stakeholders.

Cost

£20,000 per annum

Benefits

- Estimated £454,000 of cumulative benefits over five years
- Tackling fuel poverty and wider poverty by reducing individuals' fuel bills
- Job creation and local economic development
- Reducing carbon emissions

Disclosure

We aim to implement a similar partnership in our SEPD area in 2016/17.

Strategic Engagement

Realising benefits from Knowledge Transfer Partnership

In April 2014, we established a Knowledge Transfer Partnership with the University of Dundee to identify best practices in supporting communities prepare and respond to power cuts.

The research found that vulnerability depends on the presence of many factors including individuals' characteristics, personal resilience, cultural beliefs and particular events in their life at that moment in time. Our customer service offering has evolved to prioritise assistance based on personal circumstances and the urgency and complexity of the situation.

We heard that elderly residents, those with long-term health problems or with disabilities felt isolated or too proud to ask for or accept help. These findings have informed our vulnerability mapping study, and who we partner to overcome some of the social issues affecting our service provision.

Feedback has already informed:

- Our approach to involving partners and communities in planning for emergencies. This best practice is now being shared internationally⁴
- The level of detail shared in corporate communications through mass media and local media outlets
- Our vulnerability training for staff and PSR services

Cost

£48,049 per annum

Stakeholders

Communities were drawn from a number of rural, urban, islanded and multicultural settlements.

Benefits

Average SSEPD customer interruption broad measure score of 8.72⁵ up from 8.35 in 2015

Summary of other partnerships

Stakeholders said	Our Partners	How we worked together	Benefit
Improve customer service in a power cut	<ul style="list-style-type: none"> • Age UK • Macmillan • British Red Cross • Energy Action Scotland • National Energy Action 	We helped partners fund: <ul style="list-style-type: none"> • research • events • grants • one to one advice 	<ul style="list-style-type: none"> • Reaching 16,116,823 people across the UK • Directly assisting 9,200 consumers
Give us early warning of extreme weather and tools to cope	<ul style="list-style-type: none"> • Resilience partners • Care Homes • Communities 	<ul style="list-style-type: none"> • Identified central points of contact to spread the word in communities • Developed 44 local emergency and 32 business continuity plans 	<ul style="list-style-type: none"> • Identified knowledge and resources to increase resilience. Ensured early warning and preparation for the worst
Oxygen users are scared in a power cut	<ul style="list-style-type: none"> • Dolby Vivisol • NHS • Fire Scotland • SPEN 	<ul style="list-style-type: none"> • Developing information sharing protocol with Dolby Vivisol to better target support 	<ul style="list-style-type: none"> • Providing a more supported and safe service for consumers dependent on oxygen
Improve service to vulnerable consumers in a prolonged power cut	<ul style="list-style-type: none"> • Knowledge Transfer Partnership • Expert Panel • ENA Working Groups 	<ul style="list-style-type: none"> • Developed staff vulnerability training • Provision of 24 hour welfare support • Improved resilience, local community and business continuity support • Data sharing 	<ul style="list-style-type: none"> • Consumers in vulnerable positions tell us they feel supported, listened to and their views and needs are taken seriously • Standardised PSR needs codes
Increase consumer awareness of PSR Service	<ul style="list-style-type: none"> • Expert Panel • Citizens Advice Bureau • Trusted intermediaries • Resilience Partners • Dolby Vivisol • DNOs 	<ul style="list-style-type: none"> • Joint promotion campaigns 	<ul style="list-style-type: none"> • Improved clarity around benefits of PSR service • 62,710 new PSR registrations
Consumer data protection worries	<ul style="list-style-type: none"> • Scottish Government • Data sharing partners 	Informed data acquisition and management strategy	Progressed information sharing protocols

³ The Annual Fuel Poverty Statistics Report 2015 published by DECC in May 2015 shows that 'this is bigger issue' in our SHEPD than SEPD network area with 39% of households being in fuel poverty (12% in SEPD).

⁴ See page 7 of our Stakeholder Engagement Submission Part 2

⁵ We are incentivised separately on broad measure scores and report this for information only.

Embedding our strategy

Strategic Engagement

Embedding strategy in consumer interactions

To deliver a consistent high quality service, we've introduced a regional business structure and recruited a small centralised team to embed our customer service and vulnerability strategy across the company. Their priorities and approach have been informed by engagement with consumers, trusted intermediaries, our colleagues and other stakeholders. They will offer support to our seven new regional units whose primary role is to respond to the specific needs of the communities we serve. All teams are empowered to be flexible so that decisions are based on the needs of consumers (especially those in vulnerable positions) within their area.

We set out our Priority Service Register services on page 7. These services are available to any vulnerable consumer and not restricted to those who neatly fit the needs codes. We are continually improving our services. New features this year are detailed in the table on the right.

Strategic Engagement

Awareness of impact and effectiveness of actions

Our Annual Distribution Business Plan for 2016/17 includes a strategic priority to deliver excellent customer service which is tailored to the individual. For those in vulnerable positions we have committed to the following:

- Key Performance Indicators in relation to delivery of consumer vulnerability responsibilities at strategic, organisational and operational levels within SSEPD
- Provision of community based vulnerability data (based on vulnerability mapping) to inform local decisions on matters including network investment, customer service, community support activity and communications
- Implement a strategy so that customers can communicate with us on an equal basis regardless of any impairments or language differences
- All front line staff will have participated in training to help them identify, record and respond to vulnerability
- Improve the accuracy of our PSR Consumer Data

Changes made to support consumers in vulnerable positions

Any business activity which brings us into face-to-face contact with consumers in vulnerable positions

NEW

- Gained independent accreditation that we provide an inclusive service (BS 18477:2010)
- Created an Expert Panel to guide us in our approach to supporting consumers in vulnerable positions
- Created a PSR team and Social Obligations Manager and the PSR Escalation Service
- Vulnerability Training, influenced by Expert Panel, Knowledge Transfer Partnership and staff feedback, for frontline staff which includes empathetic skills and encouraging staff to 'think outside the box' to find the best solution. Additional coaching provided if required. Staff commit to applying learning in their role
- PSR team receives enhanced training including shadowing trusted intermediaries to ensure they have experienced vulnerability in real life
- Encouraged staff to advise consumers of the PSR password service
- Created help sheets (informed by our Expert Panel) for staff to help them signpost consumers to appropriate third parties when they identify vulnerability
- Refresher awareness days which focus on different forms of vulnerability and the options staff can use to sign post consumers to energy and non-energy related advice
- Focused sessions, staff to provide in-depth knowledge of the 25 PSR needs codes to ensure that they record vulnerability correctly in our database to improve the service we provide to the individual
- Overarching data sharing protocol has informed data sharing with British Gas, Dolby Vivisol, and Regional Resilience Groups
- Winter pack thermometers provide energy saving tips in the home and signposts to Energy Saving Trust
- Working with trusted intermediaries to promote the PSR service and encourage eligible consumer registration
- 26 members of staff with fully equipped welfare vans to be deployed anywhere a consumer needs extra support

Planned Supply Interruptions

NEW

- Following focus groups, we improved our written communications, text and recorded messaging about restoration time
- When appropriate, we connect customers to generators in a way which doesn't result in any loss of supply during connection and disconnection

Unplanned Supply Interruptions

NEW

- After interruption we collate and implement lessons learned and ideas for improvement where this is felt to deliver benefit to consumers
- Developed and user tested welfare packs to be distributed in emergency situations; and basic packs issued to our most vulnerable consumers at point of PSR registration
- Pre-warning PSR consumers, by phone, of bad weather which may affect their supply which helps us to cleanse data too
- Developed 44 Local Community and 32 Business Continuity Plans
- Finalists in 'Constellation Awards for collaborative work with a customer community', Utility Week Stars Award
- Funding consumers to implement their local emergency plan
- Sponsored by the Scottish Resilience Development Service, two of our staff have completed a professional qualification in Analysing Resilience Management

Network Investment

NEW

- Challenged policy makers to consider the impact of their policies on the distribution element of consumers' electricity bills

Any meetings

NEW

- Made reasonable adjustments for those attending our meetings e.g. for those with mobility, hearing or sight impairments

Accessible written, spoken, text and electronic communications

NEW

- Immediate, guaranteed access to written and spoken foreign language services
- Large print, audio-CD, braille, text talk services introduced
- Website designed to W3C AA Standards for Accessibility and ARIA Standards
- Best Use of Digital in a Crisis Situation Award, DigiAwards 2015

PSR database improvements

NEW

- Staff are prompted to ensure consumers registering by phone understand their details may be shared with a third party to receive extra services
- Tracking where consumers hear about our service at point of registration to help inform future recruitment campaigns
- Tick boxes to record if staff have a) sign-posted consumers to energy or non-energy related services; b) pre-warned consumers about bad weather; and c) pro-actively called consumers during interruptions

Our engagement summary

Section	Engagement activity	Cost	Key benefits
Our role in society	Meeting the needs of vulnerable consumers	–	<ul style="list-style-type: none"> • Treating all consumers fairly increases trust, leading to positive outcomes • Companies that pro-actively identify and tackle issues affecting vulnerable consumers at the earliest possible stage prevent the same problems becoming more widespread • We understand the dynamic nature of consumer vulnerability – consumers can move in and out of vulnerability – and we adapt their services to meet individual needs as a result
	Understanding social issues affecting vulnerable consumers		
	Mapping vulnerability		
Acquiring, using and sharing consumer vulnerability data	Our approach to acquiring and managing data	Seven days' staff time	<ul style="list-style-type: none"> • This policy has informed the data sharing partnerships we have entered into this year
	Industries working together to build better PSR registers	Five days' staff time	<ul style="list-style-type: none"> • We anticipate more PSR registrations through joint communication plans
	Addressing PSR data gaps	–	<ul style="list-style-type: none"> • We have been closing the data gap by focusing on identifying partnerships with trusted intermediaries who are able to help us connect with groups of consumers that we can offer support to through our PSR
	Data information and updating strategies	–	<ul style="list-style-type: none"> • A consistent and common methodology to determine if a data sharing partnership is in line with our strategy for acquiring and managing PSR data • Helps us identify what level of data should be shared to support consumers • Engaging across water, gas and electricity industries to improve data held on vulnerable consumers and gaining efficiencies by working together to jointly promote the PSR • Embedding our approach to PSR data management within our policies and procedures • The PSR data team cleanse an average of 772 PSR records per month
	Knowing our communities	£4,500	<ul style="list-style-type: none"> • A cost effective tool for SSEPD staff which produces an easily understood, vulnerable consumer typology within each region • Provides information on how best to communicate and engage with communities • Highlights where we need to promote our PSR to eligible consumers • Highlights social issues within the communities we serve to help us identify which ones we feel we have an active role in tackling • Target areas where there are gaps in support for consumers in vulnerable positions and where we can start to identify partnerships to address these. For example our partnership with Warmworks (see page 8), helping fuel poor consumers to reduce their energy bills
	Training in recording, identifying and understanding vulnerability	£15,000	<ul style="list-style-type: none"> • Changing the culture in the field: Manager's report has encouraged staff empathy has helped to reduce complaints • During live faults we have increased the presence of staff who can provide additional support to those who have become temporary vulnerable e.g. welfare checks, hot drinks and rest centres, friendly presence • Local and personal response to consumers who find themselves in vulnerable positions • Our staff feel empowered to treat consumers as individuals
How data is already informing our partnerships around energy and non-energy help	–	<ul style="list-style-type: none"> • Effective local partnerships targeted around communities needs • Targeted local communication and engagement strategies • Target areas where there are gaps in support for consumers in vulnerable positions and where we can start to identify partnerships to address these 	
Priority Services Register: supporting vulnerable consumers	Eligibility and take up of the PSR	–	<ul style="list-style-type: none"> • 1,807 PSR consumers registered under the four needs codes outside the core groups • 451,490 – the number of consumers on our PSR register (up16% from September 2015) • Over 17,500 PSR leaflets distributed in partnership with trusted intermediaries such as NHS, local authorities, senior clubs and community centres • Working in partnership with other DNOs, we have reached a potential of 429,000 eligible PSR customers across the UK through trusted intermediaries
	Promoting the Priority Services Register	–	
	Connecting with hard to reach consumers	£0.05 per new customer	
	Services offered to consumers on the PSR	£0.20 per registered Priority Service consumer	
Our partnership approach	Fuel poverty partnership	£20,000 per year	<ul style="list-style-type: none"> • Estimated £454,000 of cumulative benefits over the five years • Tackling fuel poverty and wider poverty by reducing individuals' fuel bills and reducing carbon emissions
	Realising benefits from Knowledge Transfer Partnership	£48,049 per annum	<ul style="list-style-type: none"> • Average SSEPD customer interruption broad measure score of 8.72 up from 8.35 in 2015 <p>We are incentivised separately on broad measure scores and report this for information only</p>
	Awareness of impact and effectiveness of actions	–	<ul style="list-style-type: none"> • Our Annual Distribution Business Plan for 2016/17 includes a strategic priority to deliver excellent customer service which is tailored to the individual