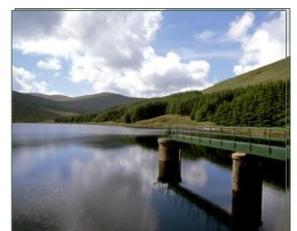


Care Register Review: special provisions for vulnerable customers (a Consumer Protection Strategy Project)

UR Consultation Paper  
July 2017



# About the Utility Regulator

The Utility Regulator is the independent non-ministerial government department responsible for regulating Northern Ireland's electricity, gas, water and sewerage industries, to promote the short and long-term interests of consumers.

We are not a policy-making department of government, but we make sure that the energy and water utility industries in Northern Ireland are regulated and developed within ministerial policy as set out in our statutory duties.

We are governed by a Board of Directors and are accountable to the Northern Ireland Assembly through financial and annual reporting obligations.

We are based at Queens House in the centre of Belfast. The Chief Executive leads a management team of directors representing each of the key functional areas in the organisation: Corporate Affairs; Electricity; Gas; Retail and Social; and Water. The staff team includes economists, engineers, accountants, utility specialists, legal advisors and administration professionals.

## Our Mission

Value and sustainability in energy and water.

## Our Vision

We will make a difference for consumers by listening, innovating and leading.

## Our Values

Be a best practice regulator: transparent, consistent, proportional, accountable, and targeted.

Be a united team.

Be collaborative and co-operative.

Be professional.

Listen and explain.

Make a difference.

Act with integrity.

## Abstract

The UR, in our Consumer Protection Strategy, made a commitment to review care registers. These registers are for customers who require additional and special services. Electricity, gas and water companies all provide certain services to vulnerable customers who choose to be included on care registers.

This paper provides information on the care registers operated by the network companies in Northern Ireland and also includes proposals for improvements in promotion and data sharing. The paper focuses on electricity and water network companies care registers. We have focused on these care registers first due to the urgent nature of the care provided. Gas network care registers will be considered when we review supply company care registers as a follow-on project.

## Audience

This paper will be of interest to a number of stakeholders including those representing vulnerable customers and those working in the gas, electricity and water industries.

## Consumer impact

The UR considers that the proposals in this paper will have a positive impact on consumers by improving awareness of care registers and awareness of the services available to those customers who register. The UR considers that the proposals in this paper will have a positive impact in relation to equality and that there should be no increase in costs as a result of the proposals in this paper.

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# Glossary and Acronyms

Civil Contingencies Group (NI)	The role of the Civil Contingencies Group (NI) is set out in the Northern Ireland Civil Contingencies Framework <sup>1</sup> which sets out a framework of preparedness for civil emergencies. This group is charged with planning and coordinating a response in the event of a civil emergency being declared in Northern Ireland.
CPS	The UR's Consumer Protection Strategy.
Care register	A special register for customers who require additional services due to a set of non-financial vulnerability criteria such as pensionable age, disability and or a chronic illness.
ICO	Information Commissioner's Office
Needs Codes	Provide a set of standardised language and data fields to allow simplified data sharing.
Network company	An electricity, gas or water company responsible for the infrastructure such as pipes, wires and other apparatus. In this paper the term network company will refer to NIE Networks,

<sup>1</sup> [https://www.executiveoffice-ni.gov.uk/sites/default/files/publications/ofmdfm\\_dev/ni-civil-contingencies-framework.pdf](https://www.executiveoffice-ni.gov.uk/sites/default/files/publications/ofmdfm_dev/ni-civil-contingencies-framework.pdf)

	Phoenix Natural Gas Limited (PNGL), firmus energy Distribution Limited (also known as distribution companies) and NIW.
NIE Networks	Northern Ireland Electricity Networks.
NIW	Northern Ireland Water.
Ofwat	Economic regulator of the water sector in England and Wales.
Ofgem	Economic regulator of the energy sector in GB.
PNGL	Phoenix Natural Gas Limited (the gas network company mainly in the Greater Belfast and Larne areas).
Priority Services Register (PSR)	Ofgem's term for care registers
SGN Natural Gas	Scotia Gas Networks Northern Ireland Ltd (delivering gas to the west of Northern Ireland including Coalisland, Cookstown, Dungannon, Magherafelt, Omagh, Enniskillen, Strabane and Derrylin).
Supply company	Any business licensed by the UR to supply electricity or gas to customers in Northern Ireland.
UKRN	UK Regulators Network; an organisation formed by 13 regulators throughout the UK each representing different sectors of the economy.
UR	The Northern Ireland Authority for Utility Regulation.

# Executive Summary

## **Background**

The UR's 5 year Consumer Protection Strategy (CPS) contained a commitment to review network companies care registers in year one and in year two to review supplier care registers. These care registers are for vulnerable customers who require special assistance and who have requested to be included in the registers.

The CPS stated that we would review Northern Ireland Water and Northern Ireland Electricity Networks care registers first; then use this learning to inform a review of the gas network companies and supply companies' care registers.

## **Scope of the Review**

As set out in the CPS there will be two consecutive reviews, the first focusing on Northern Ireland Electricity Networks and Northern Ireland Water and the second focusing on gas network companies and electricity and gas suppliers. The rationale for this split is due to the varying degree of vulnerability seen across the customer base in Northern Ireland.

This review of network companies care registers will focus on those customers exhibiting some of the highest levels of vulnerability. Furthermore, Northern Ireland Electricity Networks and Northern Ireland Water have some commonality in regards to current industry structures, licence conditions and data handling arrangements. Therefore, Northern Ireland Electricity Networks and Northern Ireland Water are a more natural fit for this review.

## **Extent of services available**

Table 1 in Section Three of this paper provides information on the services that both companies provided to their care register customers.

This review has not proposed any changes to the services provided to customers included on either the Northern Ireland Electricity Networks care register nor the Northern Ireland Water care register. This is because the feedback we have received to date indicates that the services are appropriate and we have found no evidence of problems with the services offered. Therefore, the focus of this review will be on promotion and awareness raising of the care registers.

## **Improving Awareness and Uptake**

Data sharing is an area receiving increased attention from government, regulators and utility companies as a mechanism to better identify customers in vulnerable situations. The UR has engaged with the Information Commissioners' Office to gain their expert advice on how best utility companies, where appropriate, can obtain and treat a customer's personal data; whilst still maintaining compliance with data protection protocols.

## **Data protection considerations**

The UR has explored the issue of consumer consent in this project; striving to ensure that the process of joining a care register is as straightforward as possible for consumers whilst ensuring that data protection compliance is maintained. The UR considers the 'Tell them once' approach to have merit in regards to this review

of Northern Ireland Electricity Networks and Northern Ireland Water care registers. The UR will work with the Information Commissioners' Office to develop this concept further.

### **Ofgem and UKRN consumer protection work**

Both Ofgem and UKRN have commenced similar projects to this review. They have focused on the identification of consumers through non-financial vulnerability criteria. Northern Ireland has always used non-financial vulnerability criteria for inclusion on care registers. The UR's approach to this care register review has always been to find positive consumer outcomes through a principles-based approach rather than through the use of highly complex regulatory interventions.

### **Proposals and next steps**

The UR has identified in this paper a number of proposals for both Northern Ireland Electricity Networks and Northern Ireland Water care registers going forward.

The UR will consult on the 10 proposals outlined below:

- 1) Services offered by electricity and water companies will continue to recognise the different levels of service required by customers with various different needs;
- 2) As proposed by UKRN in GB, NIE Networks and NIW should adopt a common naming convention for their care registers and use consistent and accessible language when referring to their care registers;
- 3) NIE Networks and NIW should work together to ensure that a customer who is eligible to join the NIE Networks care register is automatically

included on the NIW care register. This will ensure that the most vulnerable customers can avail of a comprehensive service particularly during a major incident.

- 4) NIW need to create a sub-set to their current care register. This sub-set is to consist of customers who are currently included on, or are eligible to be include on, the NIE Networks care register. This customer sub-set will help in targeting services during a major incident;
- 5) NIE Networks and NIW should work together to improve promotion and awareness of their care registers e.g. a common bi-annual vulnerable customer forum;
- 6) NIE Networks and NIW should work together to continue to improve relationships within community and voluntary organisations, advice giving agencies and other stakeholders who promote care registers including specifically health bodies;
- 7) NIE Networks and NIW should proactively explore ways in which data can be shared between the two companies, within data protection regulations, and for the benefit of vulnerable customers. For example, a data sharing agreement between NIE Networks and NIW; seeking express and informed consent from customers for their information to be shared between the two companies;
- 8) The UR should continue to engage with UKRN and will monitor progress;
- 9) UR should set up an annual industry forum for care registers; the purpose of which would be to continue to engage with industry and stakeholders in regards to the monitoring progress on promotion, awareness, data sharing, and collaboration. In particular an industry forum should report the number of customers registered by each of the companies; and
- 10) UR should produce and distribute a promotional leaflet (similar to that produced by UKRN) on the various services available.

## **Next Steps**

The UR invites comments and suggestions on the proposals and associated outcomes included in this care register review.

This consultation will close at **3pm on Friday 29<sup>th</sup> September 2016**.

# Background and Introduction

In Northern Ireland licence obligations have been placed on domestic electricity and gas suppliers and electricity, gas and water network companies. These obligations state that both the network companies (electricity, gas and water) and domestic suppliers must offer certain groups of vulnerable domestic customers a special package of services.

The customers entitled to avail of these special services include those who are of pensionable age, disabled or chronically sick and who have consented to be included in the registers.

In order to provide these customers with the special services, the network companies and suppliers have developed their own registers. These registers hold the personal details of customers who have registered voluntarily to avail of the special services.

In February 2016, the UR published the CPS final decision paper which included the rationale for projects that would be included in the 5 year CPS lifespan and provided details of the outcomes for each of these projects. In regards to the review of network care registers, we stated that the “feedback we have received regarding take up rates and awareness of services offered by network companies suggests that this is a priority issue”<sup>2</sup>. Therefore, in response to this stakeholder feedback, the outcomes of the network companies care register review will be increased take-up and awareness rising.

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<sup>2</sup> <https://www.uregni.gov.uk/publications/201617-202021-consumer-protection-strategy-decision-paper>

As also stated in the CPS, we will firstly focus on Northern Ireland Electricity Networks and Northern Ireland Water. Following this we will take forward the lessons learnt and we will review the care registers provided by gas network companies and electricity and gas suppliers.

The rationale for this spilt in the review of the care registers is due to the types of customers the care registers are aimed at. The UR will firstly review those care registers which focus on the most vulnerable customers in Northern Ireland. We explain this further in Section Two of this paper.

We also noted the level of support for our proposal to review critical care and customer care registers. Due to the differences between the type of services offered by network and supply companies we have decided to split this work into two separate projects. While we note that the network companies have already carried out good work in this area, the Therefore we have decided that during year 1 we will embark on a review of network company critical care registers (to include NIE and NI Water), and in year 2 we will look at other customer care registers.

### **Network companies registers**

Each of the four network companies in Northern Ireland holds a care register listing the customers who can avail of the special package of services. Each company has developed their register for their customers only, and therefore each of the registers has a unique name, as can be seen below<sup>3</sup>:

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<sup>3</sup> This review does not include Scotia Gas Networks Northern Ireland Ltd (SGN). This decision has been taken due to the lack of maturity of the SGN network, as they have only recently entered the Northern Ireland energy industry. They have a limited customer base. As SGN develop and obtain domestic customers, the UR will ensure that SGN are subject to the same obligations as other gas network companies.

- **Northern Ireland Electricity Networks (NIE Networks)** – Critical Care Register; (take-up 6000 customers as of November 2016)
- **Northern Ireland Water (NIW)** – Customer Care Register; (take-up 2778 customers as of November 2016)
- **Phoenix Natural Gas Limited (PNGL)** – Vulnerable Consumer Register; (take-up 5600 customers as of November 2016) and
- **firmus energy** – firmuscare (take-up 1500 customers as of November 2016).

The registers are distinct and unique from each other. The common aim of a care register, as set by the UR, is to provide additional assistance to vulnerable customers.

Each of the network companies listed above has developed a care register that is appropriate to their type of utility and provides the special services that their individual customer base would need and expect.

The registers listed above are used to ensure that those customers registered receive additional and prompt service from the network company in the event of a major incident, a planned or unplanned outage, a gas leak or a water interruption.

### **The UR's Consumer Protection Strategy**

The Consumer Protection Strategy (CPS) is the UR's five year flagship strategy; aiming to provide enhanced consumer protections for all domestic consumers and particularly for vulnerable consumers in Northern Ireland. Below is an extract from the CPS<sup>4</sup>.

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<sup>4</sup><https://www.uregni.gov.uk/publications/201617-202021-consumer-protection-strategy-decision-paper>

Objective	Year 1 Project	Year 2 Project
Make sure consumers have <b>equal access</b> to utility services	Review network company (NIE Networks and NIW) care registers.	Review energy supplier care registers.

The UR's CPS contained a commitment to review both network company registers and supplier registers. Both reviews are listed in the CPS under the objective of, 'Making sure there is equal access to utility services'. Our stated outcome was to ensure that the care registers are continually updated and that consumers are aware of the registers and the services they offer.

The CPS stated that we would review the NIW and NIE Networks' care registers first; then use this learning to inform a review of the supply companies' care registers. The reasons as to why we are not including gas network companies in this review, and are instead including gas network companies with the supplier (electricity and gas) care register review, are outlined in Section Two of this paper.

This consultation paper therefore relates to UR's review of NIE Networks and NIW's care registers:

- Section Two of this paper gives details on the scope of the customer review;
- Section Three an analysis of network company care registers;
- Section Four of this paper provides information on improving awareness and uptake of care registers;
- Section Five provides commentary on data protection considerations of the review;
- Section Six contains information on current work by Ofgem and UKRN in

this area of consumer protection;

- Section Seven contains UR's proposals, questions and next steps; and
- Section Eight provides information on equality and regulatory considerations.

### **Review to date**

On 30 November 2016, the UR held a communications forum on network companies' care registers and major incidents. A major incident includes severe weather, storms, floods, outages and other events which could cause large numbers of consumers to lose supply.

The forum was held in conjunction with the Consumer Council for Northern Ireland (Consumer Council) and was attended by a number of key stakeholders who represent vulnerable consumers. Representatives from the community and voluntary sector were in attendance, alongside various industry players from gas, electricity, water and also the ICO. All attendees contributed to the discussion and gave their views.

The communication forum brought together the main players that would be involved in this care register review. In this regard, the forum facilitated the following:

- 1) allowed the network companies to share best practice on dealing with major incidents and importantly on how to protect vulnerable consumers included in care registers during major incidents;
- 2) provided network companies with the opportunity to promote their care registers to a variety of advice giving agencies and groups representing

- vulnerable consumers. Network companies were able to explain the level of services they offer consumers to other organisations and agencies;
- 3) The ICO gave a presentation which a) clarified data protection obligations as they relate to all care registers and b) helped to identify the potential benefits, opportunities and challenges of sharing information in a manner designed to help vulnerable consumers; and
  - 4) UR and the network companies were able to hear from groups representing vulnerable consumers; exploring their concept of best practice and hearing examples of the customers' experiences.

The communication forum highlighted a number of noteworthy points. These are included below:

- 1) There is widespread support for the good work already in place in terms of registers and services for vulnerable customer. While there is willingness to improve current care registers if possible, they are generally considered to be working well;
- 2) There are good reasons for distinguishing between network care registers and supplier care registers. For example, the intensity level of services offered to an electricity customer who relies on an electricity supply to operate life supporting medical equipment is different to the level of priority service offered to a gas customer who requires gas for cooking or heating and who may require additional help;
- 3) There are variations in the methods of promotion, level of awareness and take-up of network care registers; and
- 4) Data protection protocols apply to the information held on all care registers. The ICO is available to work with all network and supply companies to ensure that data is treated in accordance with data protection rules and in a way which benefits vulnerable consumers.

## **The NIE Networks and NIW care registers**

UR's review to date, and the stakeholder forum described above, have not identified any issues with the services offered to customers who are included on the NIE Networks care register nor the NIW care register. They are generally considered to be good, and working well. Table 1 in Section Three of this paper provides information on the services that both companies provided to their care register customers. In addition, information received from those third sector organisations who engage with UR regularly, and who attended UR's communication forum, has not identified any deficiencies in the services on offer to customers included on the care registers offered by NIE Networks and NIW.

Indeed, the services offered to customers who are included on these two care registers are constantly monitored by the companies and we would expect any deficiencies in the services on offer to be quickly identified. In addition, any potential deficiencies in the care register customer services can come to the attention of the UR through the Consumer Council's complaint mechanism, and would be dealt with accordingly.

The research conducted as part of the formulation of the CPS, identified that the areas of improvement for care registers which needed to be addressed was the low level of awareness, the need to improve take-up, and the potential for data sharing and learning between the network companies.

Additionally, both NIE Networks and NIW continually review the services provided to customers' who are included on their respective care registers.

NIE Networks carry out regular internal reviews of processes and procedures surrounding the operational delivery of their care register scheme. During a time of

outage or interruption, NIE Networks will be in daily contact with customers who are included on their register allowing NIE Networks to capture customer's experience of the services provided and how appropriate they are and so can integrate this learning into the services provided to customers. Due to the presence of medical equipment in the domestic premises of those customers included in the NIE Networks care register, NIE Networks has worked closely with local Health Trusts to develop awareness of the register.

NIW also has a set of internal procedures and processes in place to review the services offered to customers who are included in their care register. NIW has also undergone a review of their care register, including services provided, by the Consumer Council. This review, informed by developments in the water industry in GB, was carried out in 2016.

The UR is content that the services offered to customers on both the NIE Networks and NIW care registers are currently fit for purpose. We note the internal procedures and processes that both companies have put in place to ensure that the services offered to the customers' on their care registers are adequate and provide the necessary level of support and protection.

Therefore, the UR will not include the services provided to consumers' included on the care registers of NIE Networks or NIW in this review. Rather, the focus of this review will be on promotion and awareness raising of the care registers.

Prior to the communications forum, the UR engaged directly with the Information Commissioner's Office (ICO) on the subject of network and supply care registers. The ICO kindly agreed to contribute to the communications forum, by providing a presentation on the role of data protection, and offered to work with utilities. This

engagement with the ICO will allow their expert advice to play a significant role in ensuring that customers are protected through the appropriate application of data protection laws to the use and treatment of consumer data.

Following the communication forum, the UR held a series of one-to-one meetings with the network companies in order to gain a greater understanding of the operational concepts that are unique to their particular industry (electricity, gas and water), and how these differences are reflected in the operation of their particular care registers.

In addition to the above in order to gain a wider perspective on the role of care registers across the UK, the UR entered into a dialogue with the UK Regulators Network (UKRN). The UKRN is an organisation formed by 13 regulators throughout the UK, each representing different sectors of the economy. UKRN is currently working on a project similar to the UR's network care register review. To date, the UKRN has produced an accessibility leaflet on the various services and levels of support available. UKRN are also working with Ofwat and Ofgem through a working group entitled Safeguarding Consumers Working Group (SCWG) on the potential benefits, opportunities and challenges of sharing vulnerability information. UR is keeping a watching brief on progress to identify appropriate learning opportunities and actions which could be replicated in Northern Ireland.

### **Outcome of work to date**

As outlined above, the UR, in order to conduct this care register review has had direct engagement with the network companies, undertaken desk based research, facilitated a communication forum, discussed the issues with all stakeholders, and engaged with the ICO and UKRN.

Following this, the UR has established that the current situation regarding care registers in Northern Ireland is as follows:

- 1) Promotion of registers is handled differently depending on the scope of the care register in question and the target group;
- 2) Awareness of the registers could be improved and there is currently no joint working, information sharing, or advertising/promotion of the registers between NIE Networks and NIW;
- 3) There is a wide variation in take-up, NIE Networks has 6000 customers registered while NIW has 2778 customers registered (numbers accurate at November 2016);
- 4) Data protection is of vital importance in relation to information held on care registers; and
- 5) Lessons, where appropriate, could be taken from the work carried out by Ofgem, Ofwat and UKRN.

The UR decided to not ask specific consultation questions throughout this paper. Rather, we would welcome stakeholder's comments on all aspects of this paper, ideally supported by evidence. The UR will consider all feedback received to this consultation in formulating final decisions.

## Section Two: Scope of the Review

The UR recognises that there is a spectrum of needs among customers. At the most urgent and pressing side of the spectrum are those customers who rely on a supply of electricity or water in order to operate life supporting medical equipment.

This paper will focus on the most urgent and pressing level of care (that is those customers who rely on life supporting medical equipment to maintain their health and well-being), therefore we will focus on how Northern Ireland Electricity Networks and Northern Ireland Water help these vulnerable customers, particularly in the event of a major incident.

The remainder of this paper will concentrate therefore on the registers operated and maintained by NIE Networks and NIW. The registers used by gas network companies will then be reviewed separately alongside electricity and gas supply registers. The supplier care register review is due to commence once the NIE Networks and NIW care register review has been completed.

A further reason for looking at the electricity and water registers first, relates to the differences between the electricity and water registers compared to gas. In electricity, the network company care register is maintained and updated by the network company, i.e. NIE Networks holds, updates and maintains their care register; the same applies to the NIW register. Whereas, the gas network companies do not hold, update or maintain a care register. Rather it is the gas suppliers who hold, maintain and update a register of customers who are eligible to avail of the special services offered through a care register. It is the gas supplier who will, when appropriate, pass customer details onto the gas network

companies to ensure customers receive the services they are entitled to.

In addition, the level and type of customer provisions the gas network companies' care registers offer in Northern Ireland are different. Gas, unlike electricity and water is not used to operate life supporting medical equipment and therefore it is not necessary, nor is it appropriate, for the gas network companies care registers to deliver the same intensity of consumer support that the electricity and water care registers currently do.

Both electricity and water are universal utilities, in so much as they are supplied to almost every premise in Northern Ireland, and a supply of both electricity and clean water are essential in sustaining health and well-being and in some cases life. Therefore, it is necessary that electricity and water offer an intensive level of additional support services, customers who rely on life supporting medical equipment.

The UR recognises this difference between the electricity, gas and water network companies and therefore will review the gas network companies' role in care registers alongside the electricity and gas suppliers' care registers.

For completeness at this stage, Annex 1 of this paper contains additional information on the consumer protections that both electricity and gas supply companies provide for vulnerable consumers in Northern Ireland. Also included in Annex 1 is a table which provides information on the facilities that customers receive from their gas network company if they are included on their care register.

## Section Three: Analysis of NIE Networks and NIW care registers

As stated previously, this paper will focus on the care registers provided by NIE Networks and NIW.

In our discussions with these two network companies, it was evident that NIE Networks and NIW are mindful of the specific needs of their customers, on both a daily basis and particularly during times of outage (planned or unplanned) or interruption to supply. Indeed, their current care register services were well-received at the UR workshop by consumer groups and third-sector stakeholders.

The UR wishes to build upon the good practice that is currently in place and ensure that customers who should be included on these two care registers are included.

For example, NIE Networks has built their care register services around a focused set of criteria, that of life sustaining medical equipment, offering support to customers in very challenging circumstances. In the same regard, NIW has worked closely with the Consumer Council to ensure their register is fit for purpose and will work effectively for vulnerable customers during a time of interruption to the water supply.

NI, unlike GB, has not experienced issues with the services provided through care registers. Rather, UR has heard from both industry and consumer agencies that the registers are working well. Therefore, our proposals will focus on the development of collaborative practices amongst utilities in terms of promotion and data sharing.

This section of the paper will focus on the specifics of NIE Networks and NIW care registers and will examine each of the registers in turn.

### **Northern Ireland Electricity Networks**

NIE Networks offer, through their care register, a specifically targeted level of customer support to vulnerable customers who rely on a supply of electricity to operate life supporting and sustaining medical equipment. The NIE Networks care register is therefore unique in terms of the intensity of the support offered to vulnerable customers during times of planned or unplanned outages or an interruption occur.

As discussed, a particular set of criteria is applied to consumers wishing to be included on the care register. The criteria for inclusion are informed by the list of life supporting medical equipment, which a domestic customer may have in their premises. The list includes:

- oxygen concentrator;
- home dialysis;
- hoists;
- nebuliser; and
- electric mattress.

Therefore, there is the potential for a fatality if supply is not maintained to a domestic property which has one of the above pieces of life sustaining medical equipment or if the vulnerable person in question is not given alternative support. Furthermore, NIE Networks is involved in the Civil Contingencies Group (see glossary of this paper for information); highlighting the vital role this particular

utility has in supporting customers in Northern Ireland if a national crisis was declared.

### **Northern Ireland Water**

NIW is similar to NIE Networks in that they are both universal utilities, in so much as they are supplied to almost every premise in Northern Ireland. Indeed, a supply of both electricity and clean water are essential in sustaining health and well-being and in some cases life.

However, there are a number of differences between the NIW care register and the NIE Networks care register. For example, the NIW care register has no criteria applied to joining. Rather, inclusion on the NIW care register is based only on the customers wish to be added.

Inclusion on the NIW care register allows customers to avail of the provision of bottled water if the water supply was interrupted to their domestic premise. NIW, like NIE Networks, also has a key role in the Civil Contingencies Group.

Table 1 below further sets out the detail for the NIE Networks and NIW care registers'. The UR is content that the services provided by NIE Networks and NIW are protecting consumers and working towards positive outcomes for vulnerable customers, in what can be very challenging circumstances for both the vulnerable customer and the network company.

The UR is also mindful of the dedication to and the importance which NIE Networks and NIW place on their care registers. From our engagement with both the community and voluntary sectors and the utilities it is clear that there is

currently a level of satisfaction with the services that are being delivered to consumers.

For completeness, Table 1 provides further details of the registers that NIE Networks and NIW currently operate. The information included in Table 1 includes the following:

- Services provided to consumers;
- Keeping the register up-to-date;
- Method of promotion; and
- Number of consumers in Northern Ireland that are registered (accurate as of November 2016).

**Table 1 NIE Network and NIW care registers**

Name of network company and name of register	Services provided	How is it kept up-to-date	Promotion method used	No. Registered (accurate at November 2016)
<p>NIW</p> <p>Customer Care Register</p> <p>Licence Condition G: Code of Practice for Customers and relations with the General Consumer Council</p>	<p>If there is a loss of supply NIW will give priority to customers registered when distributing alternative supplies.</p> <p>NIW will provide proactive contact to any customers registered to notify them of service problems.</p> <p>Additional free services; (1) doorstep service -a</p>	<p>An annual newsletter issued in November each year.</p> <p>Proactive half yearly contact (1100 telephone calls and 1400 letters).</p> <p>Annual letter to those who are on the register.</p> <p>In spring a courtesy telephone call to the</p>	<p>Website – features prominently on the home page.</p> <p>Distribution of leaflet at shows and exhibitions.</p> <p>Biannual vulnerable customers’ forum to promote awareness amongst other agencies with representatives from – emergency services,</p>	<p>2778</p>

	<p>louder knock and speaking clearly for those with hearing difficulties, allowing more time to answer the door for those with reduced mobility;</p> <p>(2) password scheme – register a password and NIW will use it if they have to call;</p> <p>(3) Carers Contact Service – nomination of a carer or relative to act on the customers behalf;</p> <p>(4) special advice;</p> <p>(5) information leaflets – available in alternative formats such as large print, braille and audio;</p> <p>(6) courtesy supply of</p>	<p>person on the register or the nominated carer.</p>	<p>health trusts, Consumer Council for Northern Ireland, Red Cross and Age NI.</p> <p>Dissemination through the communication channels of other agencies/bodies.</p>	
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	bottled water when supply is disrupted.			
<b>Name of network company and name of register</b>	<b>Services provided</b>	<b>How is it kept up-to-date</b>	<b>Promotion method used</b>	<b>No. Registered (accurate at November 2016)</b>
NIE Networks  Critical Care Register  Licence Condition 37. Provision of services for persons who are of pensionable age or disabled	NIE Networks provide an <b><u>information based service</u></b> to customers in a number of circumstances:  (1) Planned interruption of supply - in the event of an interruption planned by NIE Networks they will contact the customer at least three days beforehand and inform them of the expected duration of the interruption  (2) Nominated person -  Customers can provide NIE	NIE Networks write to customers on the register on an annual basis to confirm their details.  Registration can be made by – telephone, on-line, postal & market message (via suppliers)	Work with key stakeholders e.g. electricity suppliers & health trusts to ensure the right customers benefit from the service.  Customers changing supplier and moving house will be asked about the Critical Care Register (capturing new customers)	6000

	<p>Networks with details of a relative, neighbour or friend as an alternative, if NIE Networks are unable to make direct contact with them.</p> <p>(3) Unplanned interruptions to supply: (i) calls from persons on the register are prioritised, (ii) NIE Networks will provide regular contact during power cut to help customers make an informed choice on their healthcare</p> <p>(4) Dedicated critical care team during a major incident – (i) provides valuable information to customers, (ii) provides reassurance and</p>		<p>Annual winter campaign.</p> <p>Website.</p> <p>Regular messages on social media.</p> <p>Call Agents and customer facing staff will recommend the register when speaking to customers.</p> <p>Provision of information to elected representatives.</p>	
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	support, (iii) liaise with local incident centres to get up to date information, (iv) in cases of prolonged power cuts or extreme situations NIE Networks will provide a generator and (v) sharing information with customer's permission			
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# Section Four: Improving Awareness and Uptake

## Care registers numbers

Currently, there is a very wide variation in the numbers of customers included on the NIE Networks and NIW care registers. Indeed, the NIE Networks register currently records some 6000 customers, yet NIW has 2778 customers currently on their care register (see Table 2 below):

**Table 2 Care register Numbers**

Utility	No. Customers on Register (accurate as of November 2016)
NIE Networks	6000
NIW	2778

There is a large differential between the numbers of customers included on the NIE Networks and NIW registers. However there is no obvious reason (based on the needs of customers registered) why this should be the case. The NIE Networks care register operates a specific set of registration criteria; while NIW will include any customer who self nominates. Due to the specific needs of those customers on the NIE Networks care register we would expect that these customers would also require the type of additional help offered to those on the NIW care register.

Therefore, we expect improving awareness and uptake should be essential

outcomes to this review.

As part of our engagement with the network companies in preparation for this review, the UR asked the network companies to provide information on the methods of promotion they use to advertise their individual care registers. A summary of the information provided on promotional methods from NIE Networks and NIW is detailed below:

#### NIE Networks: Current promotional methods

- work with key stakeholders e.g. electricity suppliers, health trusts;
- when electricity customers change supplier and/or are moving house the new supplier will give information about the Critical Care Register (capturing new customers);
- annual winter campaign;
- website;
- regular messages on social media;
- call agents and customer facing staff will recommend the Critical Care Register when speaking to customers; and
- provision of information to elected representatives.

#### NIW: Current promotional methods

- annual newsletter encourages existing entrants to inform others;
- website;
- distribution of leaflet at shows and exhibitions; and
- call agents trained to promote awareness.

The UR considers that there is scope for greater collaborative work across utilities

in regards the promotion of customer care registers in Northern Ireland. We see this work as running in parallel too, not in place off, the data sharing agreement proposals outlined in this paper.

UR wishes to see NIE Networks and NIW work with our colleagues in the Consumer Council to develop and deliver a joint programme of promotion for their registers. UR considers this joint promotion to be a significant factor in increasing awareness of the registers and increasing uptake.

UR would envisage that this promotional work would follow our principles - based approach to this review and as such the UR would not see it necessary to mandate an approach to the format or type of promotion that NIE Networks and NIW would engage in. Rather, we recognise that the network companies have the best knowledge of their own customer base, the services they offer to vulnerable customers, and are best placed to develop a method of promotion that will resonate with their customers.

## Section Five: Data protection considerations

As this review centers on the handling of consumer information for promotion and/or data sharing agreements across the care registers; data protection considerations are integral to the project. Indeed, from the outset of this review all the network companies had raised their concerns around ensuring their compliance with data protection requirements. Therefore, the UR sought to engage with representatives from the Information Commissioner's Office (ICO) to discuss the use and treatment of customer data in relation to care registers.

The ICO stresses the need to ensure that all personal data held on care registers is used fairly and lawfully. Customers should be informed how their information will be used and when it may be shared. Customers must have a right of access to their data to ensure that it is correct. Those who hold the data may only share it in a lawful manner; this will include circumstances where the customer has expressly consented to the sharing of the data for a particular purpose.

ICO<sup>5</sup> has stated that it is good practice to develop a 'blended' approach in regards to data protection. Organisations should employ a number of techniques to preserve the privacy of information held on individuals; stressing the importance for organisations to be transparent about their processing of consumer data and comply with the legal requirements to provide privacy information.

Furthermore, the ICO highlighted the fact that transparency, in regards to the use and treatment of consumer data can be an effective tool, if embraced, of building trust and confidence with their consumers. Indeed, the ICO has commented that

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<sup>5</sup> <https://ico.org.uk/media/for-organisations/guide-to-data-protection/privacy-notice-transparency-and-control-1-0.pdf>

this approach can be used by private organisations to distinguish themselves from their competitors.

The ICO referred to the recent EU General Data Protection Regulation (GDPR), which states that the information a company or organisation provides to people about how they process their personal data must be: (1) concise, transparent, intelligible and easily accessible, (2) written in clear and plain language, particularly if addressed to a child, and (3) free of charge.

The UR will seek to incorporate the outcomes, in regards to the processing of personal data identified under the GDPR, into any of our proposals going forward for this review of NIW and NIE Networks care register.

### **Data Sharing Agreements**

A discussion on 'data sharing agreements'<sup>6</sup> is particularly relevant to this review. Based on stakeholder engagement during the project discussions with ICO, and the importance of increasing awareness and use of the registers, the UR considers this to be an area of priority going forward in relation to how NIE Networks and NIW can co-operate on data sharing.

The UR wishes to use data sharing agreements as the method to ensure that all customers who wish to be included on both the NIE Networks and NIW care registers are. The development of data sharing agreement between NIE Networks and NIW should allow customers in Northern Ireland who eligible for the NIE Networks care register, at the point of registration, to also be included on the

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<sup>6</sup> [https://ico.org.uk/media/for-organisations/documents/1068/data\\_sharing\\_code\\_of\\_practice.pdf](https://ico.org.uk/media/for-organisations/documents/1068/data_sharing_code_of_practice.pdf)

NIW care register. The UR envisages this 'double registration' to take place through the customer sharing their personal information on just one occasion.

Data sharing agreements include a common set of rules to be adopted by the various organisations involved in a data sharing operation. The ICO has stated that it is good practice to have a data sharing agreement in place, and to review it regularly, particularly where information is to be shared on a large scale, or on a regular basis between organisations.

The UR acknowledges that providing meaningful and effective information in this context and to remain compliant with data protection law is an ongoing challenge for utilities. In order to do this effectively, the ICO has advised organisations to identify the means of communication and the language and tone that is most appropriate to the audience, whilst being mindful of the way that their personal data is being used.

According to the ICO, a data sharing agreement should, at least, document the following issues: (1) the purpose, or purposes, of the sharing, (2) the potential recipients or types of recipient and the circumstances in which they will have access, (3) the data to be shared, (4) data quality – accuracy, relevance, usability etc, (5) data security, (6) retention of shared data, (7) individuals' rights – procedures for dealing with access requests, queries and complaints, (8) review of effectiveness/termination of the sharing agreement; and (9) sanctions for failure to comply with the agreement or breaches by individual staff.

In addition, the ICO would stress the need for a 'privacy by design' approach. The GDPR, which will take effect on 25 May 2018, will require, in certain circumstances that a Data Privacy Impact Assessment (DPIA) is completed.

Under GDPR, a DPIA will be required, for example, when using new technologies and when the processing is likely to result in a high risk to the rights and freedoms of individuals.

While not a legal requirement under the DPA, the ICO has promoted the use of DPIAs as an integral part of taking a privacy by design approach.

The UR considers that there is merit in exploring the concept of a data sharing agreement between NIE Networks and NIW and would allow the use of the 'Tell them once' principle. The use of the 'Tell them once' principle would allow a customer who is eligible to be included onto the NIE Networks care register also being included onto the NIW care registers, once consent is obtained, simultaneously at the point of registration onto one care register. Such an agreement could facilitate the lawful sharing of data where the customer has expressly consented to the sharing of their personal data. The objective of such an agreement would be to achieve the best possible outcome for vulnerable customers, and to ensure that they are able to avail of services offered by both NIW and NIE Networks care registers.

## Section Six: Ofgem and UKRN consumer protection work

### **Ofgem**

In GB the electricity and gas regulator, Ofgem, has a requirement in place for electricity and gas companies (both network and supply companies) to operate a Priority Services Register (PSR). The PSR provisions require electricity and gas companies to provide similar services to those currently offered by electricity and gas companies in Northern Ireland through their care registers.

### **PSR investigation**

Ofgem<sup>7</sup> has investigated the quality of the PSR services provided by GB electricity and gas companies (both network and supply companies) and the views of the customers affected. The results of Ofgem's investigations into the PSRs showed that there was a lack of awareness of the PSR itself and there was a low level of awareness amongst energy companies' staff of the types of customer who might be eligible to be included in the PSR.

The investigation concluded that improvements need to be made to the training of frontline staff to ensure that they were better able to recognise and refer eligible customers. Also, the literature circulated about the PSRs could be improved and there was evidence of a lack of consistency in the mechanisms used for referring eligible customers from supplier to network companies care registers.

In response to these findings, the Safeguarding Customers Working Group

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[https://www.ofgem.gov.uk/system/files/docs/2016/06/priority\\_services\\_register\\_statutory\\_consultation\\_and\\_proposals.pdf](https://www.ofgem.gov.uk/system/files/docs/2016/06/priority_services_register_statutory_consultation_and_proposals.pdf)

(SCWG) was established; bringing together the energy industry and non-industry relevant bodies i.e. Age UK and Citizen's Advice. The group's main aim is to look at areas using a co-ordinated approach across the industry to benefit and safeguard customers in vulnerable situations.

Ofgem has attempted to develop a more standardised and simplified approach towards safeguarding customers through the creation of a common set of Needs Codes (which are the categories that allow a customer to register on to the PSR) which not only meets the current needs of both electricity and gas but also anticipates and supports the future requirements for the wider data sharing. These Needs Codes provide a common language to allow simplified data sharing.

### **UK Regulators Network (UKRN)**

The UR has also engaged in dialogue with the UK Regulators Network (UKRN), this is an organisation formed by 13 regulators throughout the UK each representing different sectors of the economy. UKRN's aim is to encourage and build upon a culture of collaboration among UK regulators through a programme of work which seeks out opportunities for cooperation between regulators.

Vulnerable customer identification and data sharing is one of several areas of focus for the UKRN. The UKRN is trying to provide an answer to the question of ensuring data protection principles and how vulnerable consumers' data should be managed.

UKRN is also currently working on a care register project. UKRN is working with Ofwat and Ofgem through the Safeguarding Consumers Working Group (SCWG) on the potential benefits and opportunities and challenges of sharing the data of vulnerable customers. To date, the UKRN has adopted a common naming

convention for utilities care registers and produced an accessibility leaflet on the various services and levels of support available to consumers.

The UKRN is currently exploring how energy and water companies could better share data on vulnerable consumers. UKRN's work has involved a research piece to understand how vulnerable customer data is currently managed within by energy and water companies, what options exist for better sharing of data and what the benefits and challenges (e.g. data protection/ security) of any changes might be.

UKRN has evolved its initial thinking; moving away for a purely technological approach to data sharing to a recognition of data sharing as one of a number of cross-sector approaches that could be used to deliver the desired outcome, that of more effective identification of vulnerability. UKRN's project has revealed that data sharing is one of many cross-sector options that could help companies identify vulnerability.

A number of other options that could allow for more collaboration between companies, laying the foundations for the development of data sharing in the long-term, have been identified by UKRN. They include the following:

- **sign-posting support services** – companies working together to 'sign-post' customers to each other's service, either via written communication or via their website, phone or face-to-face; and
- **One-way referrals using basic personal information** – allows for a company, once it has identified vulnerability, to inform a partnering company of the need for support (with customer consent).

## **UR commentary**

The UR is committed to learning from elsewhere and to finding a way forward that is most suitable to Northern Ireland. In this regard, the UR welcomes the progress made to date by both Ofgem and UKRN in advancing the potential for regulatory interventions to provide positive outcomes for vulnerable energy and water customers.

The UR is mindful that Northern Ireland is different and has one electricity network company and one water network company in operation, unlike GB which has multiple network operators across different regions. The small size of our market allows a more direct style of engagement and the absence of challenges around ensuring continuity and uniformity of delivery of regulatory interventions. Furthermore, our engagement with the utilities and the consumer agencies has identified good practices in relation to the care registers. We wish to ensure that any of the outcomes of this review are appropriate for Northern Ireland and reflect the needs of our consumer base.

From our discussion with industry and consumer agencies we are satisfied that this review should not focus on the services provided to customers who are included on NIE Networks or NIW care registers. Rather we wish ensure that the services provided by these network companies are more widely publicized. The UR considers a piece of collaborative promotional work between NIE Networks and NIW will be sufficient to increase awareness of the registers and the services they provide. This is a less complex proposal than that put forward by Ofgem but the UR considers it to be a more appropriate fit for the size of Northern Ireland.

We also note the different licence requirements and industry arrangements across electricity, gas and water.

We note that in GB regulators such as Ofgem, Ofwat and UKRN are dealing with a number of electricity network companies and a number of water companies operating in different areas; this is to an extent what is driving the inconsistencies in service levels and awareness that Ofgem has identified. As far as network companies are concerned, Northern Ireland has the advantage that NIE Networks and NIW can access nearly all households in Northern Ireland.

The conclusions reached by UKRN in regards to their data sharing project are noted by the UR. We wish to take guidance from the lessons learned through the UKRN project, particularly as UKRN has stated that the challenges they identified with a complex technology solution to data sharing would take significant time and resource to overcome.

The UR considers that, due to the size and scale of our utilities in Northern Ireland, we can arrive at some of the same positive consumer outcomes of data sharing and increased awareness rising (described by Ofgem and UKRN) through direct engagement with NIE Networks and NIW.

We note that in GB a common naming convention for the care registers has been adopted. The UR considers that this approach could be beneficial in helping to increase consumer uptake of the care registers in Northern Ireland. Therefore, we will include this concept in our proposals.

UR is continuing to keep a watching brief on progress to identify learning opportunities and to identify actions which should be replicated in Northern Ireland.

# Section Seven: Proposals, questions and next steps

The UR has actively listened to and engaged with industry and consumer representatives during this project as well as other key stakeholders such as ICO. The UR has considered all of this information and we want to focus on a number of measures that we consider appropriate for, and reflective of, the Northern Ireland context. Therefore, we want to consult on the proposals outlined below:

1. Services offered by electricity and water companies will continue to recognise the different levels of service required by customers with various different needs;
2. As proposed by UKRN in GB, NIE Networks and NIW should adopt a common naming convention for their care registers and use consistent and accessible language when referring to their care registers;
3. NIE Networks and NIW should work together to ensure that a customer who is eligible to join the NIE Networks care register is automatically included on the NIW care register. This will ensure that the most vulnerable customers can avail of a comprehensive service particularly during a major incident.
4. NIW need to create a sub-set to their current care register. This sub-set is to consist of customers who are currently included on, or are eligible to be include on, the NIE Networks care register. This customer sub-set will help in targeting services during a major incident;
5. NIE Networks and NIW should work together to improve promotion and awareness of their care registers e.g. a common bi-annual vulnerable customer forum;
6. NIE Networks and NIW should work together to continue to improve relationships within community and voluntary organisations, advice giving

agencies and other stakeholders who promote care registers including specifically health bodies;

7. NIE Networks and NIW should proactively explore ways in which data can be shared between the two companies, within data protection regulations, and for the benefit of vulnerable customers. For example, a data sharing agreement between NIE Networks and NIW; seeking express and informed consent from customers for their information to be shared between the two companies;
8. The UR should continue to engage with UKRN and will monitor progress;
9. UR should set up an annual industry forum for care registers; the purpose of which would be to continue to engage with industry and stakeholders in regards to the monitoring progress on promotion, awareness, data sharing, and collaboration. In particular an industry forum should report the number of customers registered by each of the companies; and
10. UR should produce and distribute a promotional leaflet (similar to that produced by UKRN) on the various services available.

## **Outcomes**

UR considers that the current system of care registers is delivering well for consumers in Northern Ireland and we wish to build upon this good practice. We consider that the proposals in this paper are proportionate and can add to the good services currently offered.

We consider that the proposals in this paper should deliver the following outcomes for consumers:

1. Reduced confusion about the different services offered by network companies;

2. Increased awareness amongst consumers and stakeholders representing vulnerable customers;
3. Increased data sharing (ensuring compliance with data protection requirements); and
4. Increased collaboration amongst industry and a range of stakeholders who can help with promotional uptake of care registers.
5. Allow for monitoring of the take-up levels of the care registers. An annual industry forum will facilitate this sharing of information on care registers in Northern Ireland.

Respondents are asked to comment on each of UR's proposals. In particular respondents are asked to provide any specific evidence they have which may support their points.

The UR decided to not ask specific consultation questions throughout this paper. Rather, we would welcome stakeholder's comments on all aspects of this paper, ideally supported by evidence. The UR will consider all feedback received in formulating final decisions.

## **Next steps**

- 1) UR will continue review responses to the consultation.
- 2) UR will continue to work with the companies involved.
- 3) Following this UR will produce a decision paper.

# Section Eight: Equality considerations and Regulatory considerations

As a public authority, the UR has a number of obligations arising from section 75 of the Northern Ireland Act 1998. These obligations concern the promotion of equality of opportunity between;

- persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;
- men and women generally;
- persons with disability and persons without; and
- persons with dependents and persons without.

The UR must also have regard to the promotion of good relations between persons of different religious belief, political opinion or racial groups.

In the development of its policies the UR also has a statutory duty to have due regard to the needs of vulnerable consumers i.e. individuals who are disabled or chronically sick, individuals of pensionable age, individuals with low incomes and individuals residing in rural areas. Some of the above equality categories will therefore overlap with these vulnerable groupings.

The UR considers that there should be no increase in costs associated with the proposals in this paper. In theory by working together companies should be able to achieve improved outcomes for consumers at the same or reduced cost.

In order to assist with equality screening of the consultation in relation to care registers, the UR would be grateful if respondents would comment on

the equality impact of the proposals and to provide any information or evidence in relation to the needs, experiences, issues and priorities for different groups which they felt was relevant to the implementation of any of the proposals.

The consultation period will close at **3pm on Friday 29<sup>th</sup> September 2017**

Responses to this consultation should be forwarded to reach the Utility Regulator on or before **3pm Friday 29<sup>th</sup> September 2017** to:

Meadhbh Patterson  
The Utility Regulator  
Queens House  
14 Queen Street  
Belfast  
BT1 6ED  
Email: [Meadhbh.Patterson@uregni.gov.uk](mailto:Meadhbh.Patterson@uregni.gov.uk)

Your response to this consultation may be made public by the UR. If you do not wish your response or name made public, please state this clearly by marking the response as confidential. Any confidentiality disclaimer that is automatically produced by an organisation's IT system or is included as a general statement in your fax or coversheet will be taken to apply only to information in your response for which confidentiality has been specifically requested.

Information provided in response to this consultation, including personal information may be subject to publication or disclosure in accordance with the access to information regimes; these are primarily the Freedom of Information Act 2000 (FOIA) and the Data Protection Act 1998 (DPA). If you want the information that you provide to be treated as confidential, please be aware that, under the

FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things with obligations of confidence. In view of this, it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Authority.

This document is available in accessible formats.

Please contact Meadhbh Patterson ([Medhbh.Patterson@uregni.gov.uk](mailto:Medhbh.Patterson@uregni.gov.uk)).

# Annex 1

## **Additional background information on services offered to customers by supply companies.**

Currently all electricity and gas supply companies must follow this guidance from the UR in regards to consumer protection:

- establish and maintain a register of domestic customers who are of pensionable age, disabled or chronically sick and who wish to be included on the register;
- ensure that the register holds sufficient information of the age, disability or chronic illness of domestic customers to allow their specific needs or requirements to be identified;
- inform domestic customers at least annually of the existence of the register and how eligible customers can be included on it;
- provide (free of charge) advice and information to customers on the services available from their supplier because of their age, disability or chronic illness;
- demonstrably promote care registers to encourage greater identification and sign up of eligible customers;
- encourage appropriate organisations (such as but not exclusive to advice giving agencies) to raise awareness of the existence of supplier care registers amongst members and clients;

- ensure that relevant staff are adequately trained in the identification of customers who may be eligible for the customer care scheme and in treating customers in an empathetic manner to encourage customers to self-identify;
- where appropriate and in line with data protection provisions, provide information from the supply company's care register to the relevant electricity or gas network company;
- the supply company must, in respect of any domestic premises to which it cuts off the supply of electricity:
  - Maintain a record for at least a period of six months, or (where a complaint has been made in respect of the Licensee's actions to cut off the supply) for at least a period of six months after the complaint has been resolved; and
  - Provide to the Authority on request, evidence of the reasonable steps it took pursuant to the arrangement set out in its Code of Practice (Gas Condition 2.11.6 and Electricity Condition 31.6).

## Phoenix Natural Gas Limited and firmus energy care register information

	Facilities offered	How is it kept up-to-date	Promotion method used	No. Registered (accurate at November 2016)
PNGL  'Vulnerable' Consumer Register	<p>Where a network emergency has resulted in loss of supply use the Register to prioritise reconnections.</p> <p>Where PNGL undertakes essential asset maintenance they would not disconnect the gas supply to premises on the register if access was consistently denied.</p> <p>Customers on the Vulnerable Care register may qualify for some or all of the following services from their gas supplier: (1) gas meter exchanges &amp; re-positioning, (2) Customised billing format, (3) Assisted</p>	<p>Gas suppliers establish and maintain a register of all consumers who have asked to be included on it and provide the register to the gas network company when required</p> <p>PNGL requests monthly updates from domestic gas suppliers.</p> <p>'Vulnerable Consumer' flag set on PNGL Asset Register for that premises.</p>	Gas suppliers inform all consumers annually of the existence of register.	5,600

	meter reading, (4) Specialised adaptors and controls for boilers and meters, (5) Gas boiler safety inspection, (6) Password scheme and (7) Nominated person to receive bills and communications.			
<b>Name of gas network company and name of register</b>	<b>Facilities offered</b>	<b>How is it kept up-to-date</b>	<b>Promotion method used</b>	<b>No. Registered (accurate at November 2016)</b>
firmus energy Distribution Limited  firmuscare	This register allows firmus energy to (1)co-ordinate the safe evacuation of vulnerable customers first if required (2) provide blankets and heaters etc. to vulnerable customers first (3) reconnect –purge and relight the boilers of vulnerable customers first  firmuscare register customer may qualify for some or all of the following services from their gas supplier: (1) gas meter	firmus energy Supply Limited (which is a gas supply company) is responsible for managing and maintaining the register and to ensure that an updated version is provided to firmus energy distribution Limited on a monthly basis  Two 'firmuscare registers' exist – one for the firmus distribution network area and	Promotion is mainly carried out by the supply company.	1500

	<p>exchanges &amp; re-positioning, (2) Customised billing format, (3) Assisted meter reading, (4) Specialised adaptors and controls for boilers and meters, (5) Gas boiler safety inspection, (6) Password scheme and (7) Nominated person to receive bills</p>	<p>another for Greater Belfast (where PNGL is the network company and firmus is a supplier)</p> <p>There are no other domestic gas suppliers in the firmus distribution network area so the firmus supply 'firmuscare' register is a comprehensive list of all the vulnerable gas customers in the firmus area</p> <p>Annual audit of the customer and household to determine requirements under the register and special services required</p>		
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