

Electricity Distribution Stakeholder Engagement and Consumer Vulnerability (SECV) Incentive Guidance

Version 1

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Overview:

To ensure the ongoing delivery of an efficient network that embraces wider social and environmental objectives, electricity distribution network operators need to engage with a range of stakeholders. Key stakeholders will include parties that are affected by, or represent those affected by, decisions made by the network companies.

In particular, network companies have an important role to play in helping consumers in vulnerable situations. Our Consumer Vulnerability Strategy and Priority Service Register Review highlight the need for network companies to maximise their role in this respect.

The Stakeholder Engagement and Consumer Vulnerability (SECV) Incentive drives network companies to engage with stakeholders and address consumer vulnerability issues. The SECV Incentive Guidance outlines the scope of the incentive, the application process, the assessment process and the reporting requirements.

Version history

Version No.	Changes	Purpose	Author	Release Date
1.0	-	To issue the SECV Incentive Guidance	Ofgem	Xx xx 2015

Associated documents

Electricity Distribution Licence – Charge Restriction Condition 2C (Broad Measure of Customer Service Adjustment)

<https://epr.ofgem.gov.uk/Document>

Strategy decision for RIIO-ED1 - Outputs, incentives and innovation

<https://www.ofgem.gov.uk/ofgem-publications/47068/riioed1decoutputsincentives.pdf>

Consumer Vulnerability Strategy

<https://www.ofgem.gov.uk/ofgem-publications/75550/consumer-vulnerability-strategy.pdf>

Priority Services Register – Final Proposals

<https://www.ofgem.gov.uk/publications-and-updates/priority-services-register-review-final-proposals>

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1. Introduction

Chapter Summary

This chapter outlines the purpose of the incentive, the purpose of this document and the status of this document from a compliance perspective.

Purpose of this incentive

1.1. The aim of the Stakeholder Engagement and Consumer Vulnerability (SECV) Incentive is to encourage network companies to engage proactively with stakeholders in order to anticipate their needs and deliver a consumer focused, socially responsible and sustainable energy service.

1.2. Proactive stakeholder engagement is necessary for efficient business practice. The stakeholder engagement element of the Broad Measure of Customer Service incentivises network companies to perform beyond 'business as usual' standards (ie beyond the requirements of the licence conditions) and to seek timely input and feedback from stakeholders on relevant issues, business activities and other developments. We expect that each network company will use this feedback to inform their current business operations and planning for future decision making.

Purpose of this Guidance


1.3. This document sets out the regulation, governance and administration of the SECV Incentive. This document is issued by the Authority¹ under Part H of the relevant licence condition (Charge Restriction Condition (CRC) 2C. Broad Measure of Customer Service Adjustment). This document may be revised and reissued in accordance with Part H of CRC 2C.

1.4. This Guidance Document is only relevant to the electricity distribution licensees. There are separate guidance documents for the transmission and gas distribution stakeholder engagement incentives.

Compliance

1.5. To be considered eligible for a reward, a network company must demonstrate that it meets the criteria set out in the SECV Incentive Guidance. We have attempted to make this document accessible and informative to a range of stakeholders, especially those that are interested in understanding how we incentivise and drive network companies to engage with stakeholders and address consumer vulnerability issues.

¹ The terms "Authority", "Ofgem", "we" and "us" are used interchangeably in this document. The Authority refers to the Gas and Electricity Markets Authority. Ofgem is the Office of the Gas and Electricity Markets.



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1.6. For the avoidance of doubt, this document is subordinate to the licence. This document does not change any definition or obligations contained within the electricity distribution licence and if, in the event of any dispute, the licence will take precedence.

2. Scope of the scheme

Chapter Summary

This chapter outlines the scope of the SECV Incentive.

2.1. Stakeholders are individuals or organisations that affect or can be affected by the activities of the network company. They may have a direct or indirect interest in a network company's business, and their contact with the network company may be anything from daily interaction to those who have only occasional contact. Stakeholders can include consumers, investors, regulatory authorities, local government agencies, non-governmental organisations (NGOs) and other interested organisations. We expect network companies to pay particular attention to stakeholders that represent the interests of vulnerable consumers, as defined in Ofgem's Consumer Vulnerability Strategy.²

2.2. Through the SECV Incentive we aim to reward high quality activities undertaken by the network companies and outcomes these activities deliver. These activities and outcomes must go beyond the network companies' business-as-usual activities.

² <https://www.ofgem.gov.uk/ofgem-publications/75550/consumer-vulnerability-strategy.pdf>

3. Application process

Chapter Summary

This chapter outlines what needs to be included in the network company's application.

3.1. We are inviting each network company to put forward a Submission in relation to engagement activities carried out during the Regulatory Year in question. We require each network company's Submission to include three parts.

Part 1

- Aimed at demonstrating that the network company meets the Minimum Requirements.

Part 2

- Aimed at demonstrating network company performance against the Panel Assessment Criteria.

Part 3

- Aimed at demonstrating network company performance against the the Consumer Vulnerability Criteria.

3.2. Network companies will have some flexibility as to how they gather and present relevant evidence to meet the requirements of each stage. In assessing the quality of the network company's activities and the effectiveness of their outcomes, we will need to be satisfied that the evidence presented is robust and verifiable.

Part 1 Submission

3.3. The Part 1 Submission is aimed at demonstrating that the network company has an engagement strategy in place that satisfies the **Minimum Requirements** stated in paragraph 4.2 of this document. Each network company is encouraged to consider the following means of gathering evidence to support Part 1 of their Submissions:

- independent evaluation / audit – to assess the network company's approach to stakeholder engagement and consumer vulnerability covering: process of engagement, quality of engagement, senior management buy-in, governance arrangements, impact on culture, organisational activities and senior decision-making, cost effectiveness, likely outcomes for consumers/communities, etc;
- relevant accreditation schemes;
- results and feedback from stakeholder engagement surveys;

- evidence of culture change, senior management buy-in, eg as reflected in key strategic documents and decision-making arrangements within the company.

Part 2 Submission

3.4. The Part 2 Submission is aimed at demonstrating performance against the **Panel Assessment Criteria** stated in paragraph 4.9 of this document.

3.5. In Part 2 of their Submission, each network company should submit a summary of the activities and outcomes resulting from its stakeholder engagement activities carried out during the Regulatory Year in question. We recommend that this part of the Submission includes the following information -

- the nature of the stakeholder engagement activities undertaken which led to the showcased outcomes/action plans;
- how these outcomes fit with the organisation's stakeholder engagement strategy;
- any impact the outcomes have had on policies, procedures, business plans and/or organisational culture;
- any impact the outcomes have had on stakeholder groups;
- any mechanisms by which the outcomes are monitored and reported within the organisation;
- any outcomes/action plans which are considered best in class and/or portray an innovative approach.

Part 3 Submission

3.6. The Part 3 Submission is aimed at demonstrating network company performance against the **Consumer Vulnerability Criteria** stated in paragraph 4.16 of this document.

3.7. In Part 3 of their Submission, each network company should provide a summary of the activities and outcomes resulting from its activities carried out to address consumer vulnerability.

4. Assessment process

Chapter Summary

This chapter outlines the assessment process of the SECV Incentive.

4.1. Our assessment process will involve the following steps –

- Internal assessment against the Minimum Requirements.
- Panel assessment against the Panel Assessment Criteria
- Consultant assessment against the Consumer Vulnerability Criteria

Internal assessment against the Minimum Requirements

4.2. The SECV Incentive is designed to only reward network companies for high quality activities or outcomes that go beyond business-as-usual. Network companies must therefore have basic processes in place to meet the following **Minimum Requirements** to be eligible for a reward:

- The network company has comprehensive and up-to-date stakeholder engagement and consumer vulnerability strategies.
- A broad and inclusive range of relevant stakeholders have been engaged. This specifically includes engaging with challenging or hard-to-reach stakeholders (eg community energy).
- The network company has used a variety of appropriate mechanisms to inform and engage their stakeholders – these have been tailored to meet the needs of various stakeholder groups, and are fit for purpose in allowing a detailed analysis of a breadth of stakeholder perspectives.
- The network company can demonstrate it is acting on input / feedback from stakeholders.
- The network company can demonstrate that stakeholder engagement has led to positive outcomes for stakeholders.

4.3. An Internal Team will assess each network company's Part 1 Submissions, to identify evidence that the network company meets the Minimum Requirements.

4.4. The Internal Team will be comprised of Ofgem staff that have electricity distribution experience. They will consider all of the supporting evidence and the information provided in the entry form.



4.5. If required, the Internal Team will ask the network company supplementary questions to clarify any aspects of its submission. We would not expect this process to result in any additional information being provided to us. All supplementary questions and answers will be published.

4.6. If the Internal Team identifies evidence to demonstrate that the network company has satisfied all of the Minimum Requirements, then they are eligible for a reward. All network companies will be informed of the outcome of the internal assessment against the Minimum Requirement in advance of the Panel Session. Those network companies that meet the Minimum Requirements will be invited to attend a Panel Session. Those network companies that do not meet the Minimum Requirements will not be invited to the Panel Session and will be advised of the reasons for our decision.

Panel assessment against the Panel Assessment Criteria

The Panel Session

4.7. The Panel will only assess those Submissions that have met the Minimum Requirements, as assessed by the Internal Team. The focus of their assessment will be the Part 2 and 3 Submissions (although they will receive the licensee’s complete Submission for information purposes). The Panel will also receive the Consultant’s Report to aide their assessment of performance.

4.8. Each invited network company will have an opportunity to take part in a 20 minute question and answer session with the Panel on the day of the Panel Session. We will perform a secretariat role at the Panel Session. Each network company will be notified of the date and agenda for the Panel Session in advance.

4.9. The Panel will assess the companies against the **Panel Assessment Criteria:**

- initiatives are part of a holistic approach embedded in their business
- initiatives reflect innovative thinking that may be recognised as smart/best practice and could be replicated across the industry
- initiatives which best serve specific interests of challenging groups or hard to reach stakeholders
- initiatives result in measurable benefits for stakeholders
- the quality of the network company’s strategy to address consumer vulnerability and the quality of the outcomes delivered.

4.10. The Panel will score the network company out of 10. The score out of 10 will be given the reference points below:

Score	<i>Below 5</i>	<i>5</i>	<i>6-7</i>	<i>8</i>	<i>9-10</i>
Description	Weak	Average	Fair	Good	Excellent

4.11. The score for each criterion will be weighted using the weightings below to calculate an Overall Panel Score. The Overall Panel Score will determine the allocation of a financial reward under the incentive mechanism, as outlined in Chapter 5.

Panel Assessment Criteria	Weighting (%)
initiatives are part of a holistic approach embedded in their business.	15
initiatives reflect innovative thinking that may be recognised as smart/best practice and could be replicated across the industry	25
initiatives which best serve specific interests of challenging groups or hard to reach stakeholders.	10
initiatives result in measurable benefits for stakeholders.	25
The quality of the network company's strategy to address consumer vulnerability and the quality of the outcomes delivered.	25

4.12. After the Panel has made its decision it will provide some general feedback on Submissions to each network company on the day of the Panel Session.

4.13. Following the Panel Session, we will provide detailed feedback to each network company to explain the Overall Panel Score received, highlight best practice and identify key areas for improvement. This will take the form of written feedback, setting out the score for each category and explanation as to how this value was decided. It will include points the Panel liked, as well as areas for improvement. We will also provide individual oral feedback to each network company that requests it.

The Panel Members

4.14. The Panel will be comprised of at least four scoring members and a non-scoring chair (who will be an Ofgem employee). All members will be drawn from organisations with expertise in stakeholder and consumer engagement. At least one member of the Panel will also have consumer vulnerability expertise. Tenure on the Panel will be time-limited, with a proportion changed from time to time to allow for a diversity of views, regions and organisations to be represented. We will publish the biographies for each of the Panel Members in advance of the Panel Session. Panel members must declare any potential conflict of interest to Ofgem in advance of the Panel Session.

4.15. We will provide guidance to the Panel and brief them before the Panel Session (eg on the role of energy network companies, the regulatory framework, the purpose of this incentive and the Panel's role). We will also provide the Panel with a copy of the Panel Assessment Criteria to undertake an initial assessment of the network company's Submission ahead of the Panel Session.

Consultant assessment against the Consumer Vulnerability Criteria

4.16. Before the Panel Session, an independent third party (appointed by Ofgem in advance, but funded by the network companies) will critically assess the network companies against our high-level **Consumer Vulnerability Criteria**:

- Strategic understanding and commitment to the role that network companies can play in tackling social issues relevant to vulnerable consumers.
- Engagement with stakeholders to improve the data and information that they hold on vulnerable consumers and what they do with it.
- Approach taken to management and use of the Priority Service Register (PSR) and associated services.
- Approach taken to develop and utilise partnerships (eg referral networks) to identify and deliver solutions (both energy and non-energy) for vulnerable consumers.
- Embedding their strategy for addressing consumer vulnerability in their systems, processes and how they manage consumer interactions.

4.17. The high-level Consumer Vulnerability Criteria are underpinned by Detailed Consumer Vulnerability Sub-Criteria; these are given in Appendix 2.

4.18. The Consultants will focus on assessing the company's Part 3 Submission, but will also receive the company's Part 1 and Part 2 Submissions. In their Submissions, the network companies need to justify why activities undertaken and the outputs delivered are appropriate for the consumers they serve.

4.19. The Consultants will critically assess the network company's activities and outputs against the Detailed Consumer Vulnerability Sub-Criteria. The Consultants used to assess performance will be common across all the network companies.

4.20. To help assess performance, the Consultants will conduct a site visit to each network company. The purpose of the site visit is to challenge and probe the Consultant's initial assessment of each network company. The Consultants will carry out an initial assessment of each network company's performance in advance of the site visit. The site visits will be conducted after the Submissions have been made and will be prearranged between the Consultant and the network company, and can only be delayed in exceptional circumstances. The Consultant will provide the network company with a list of key topic areas that they wish to discuss prior to the visit. Information such as slides or notes may be given to the Consultant on the visit but this should not contain any new information. If the Consultant asks the network company to explain or clarify any aspects of their Submission, the network company is allowed to provide new information, but the new information will not form part of the Consultant's assessment.

4.21. The Consultants will produce a report outlining their results ("the Consultant's Report"). The Consultant's Report will score each network company out of 10 against each Consumer Vulnerability Criteria. Each of the Detailed Consumer Vulnerability



Sub-Criteria will have the same weighting in the Consultant’s assessment. The score out of 10 will be given using the reference points below.

Score	<i>Below 5</i>	<i>6-7</i>	<i>8</i>	<i>9-10</i>
Description	Weak	Fair	Good	Excellent

4.22. The Consultant’s Report will provide a written narrative to explain the score given. The Consultant’s assessment will be based on the activities undertaken and outputs delivered in that Regulatory Year; it will not consider future activities and/or proposed outcomes.

4.23. The network companies will get the opportunity to check a draft version of the Consultant’s Report for a short period, to highlight any factual inaccuracies and information they wish to be redacted.³ This is not an opportunity for network companies to comment on the views stated by the independent third party.

4.24. The Panel will use the Consultants’ Report to help assess network company performance against the Panel Assessment Criteria. The network companies’ performance addressing consumer vulnerability issues is relevant to all of the Panel Assessment Criteria, most notably criterion five (“*the quality of the network company’s strategy to address consumer vulnerability and the quality of the outcomes delivered*”).

³ Any debate regarding redactions will be referred to Ofgem for arbitration

5. Format of the application and timescales for reporting

Chapter Summary

This chapter outlines the format of the application and the timescales for reporting.

Format of application

5.1. Applications should consist of the following -

Application Checklist	Length of Submissions
<p>Part 1 Submission:</p> <ol style="list-style-type: none"> 1. Entry form (template outlined in Appendix 1) providing evidence that the network company has met the Minimum Requirements; and 2. Overview of evidence; 	<p>Entry Form (template outlined in Appendix 1) – maximum of four A4 pages.</p> <p>Overview of evidence – maximum of ten A4 pages (excluding covers pages, content pages and blank pages).</p>
<p>Part 2 Submission:</p> <ol style="list-style-type: none"> 1. Summary of outcomes/activities/action plans resulting from stakeholder engagement activities carried out during the Regulatory Year in question. 	<p>Maximum of ten A4 pages (excluding covers pages, content pages and blank pages).</p>
<p>Part 3 Submission:</p> <ol style="list-style-type: none"> 1. Summary of the outcomes, activities and actions plans resulting from its activities carried out during the Regulatory Year in question to address consumer vulnerability. 	<p>Maximum of ten A4 pages (excluding covers pages, content pages and blank pages).</p>

5.2. The Submissions should clearly identify the driver for activities where that driver has come from an Ofgem, DECC and other statutory body incentive (eg activities that form part of a Low Carbon Network Fund, Network Innovation Competition or Network Innovation Allowance project) or intervention. Such activities are not necessarily out of scope, but highlighting them is intended to increase transparency for the Panel and stakeholders.

5.3. The format of the application and the use of graphics are flexible and there is no restriction on the font sizes used in Submissions (however Submissions must be legible). Embedded URLs are acceptable.

5.4. The network companies should not provide any supplementary information as part of the Submission, unless requested by the Internal Team, the Consultants or the Panel Members.

Timescales for reporting

5.5. This guidance document applies to Submission made from April 2016 onwards. From this date, electronic copies of the Submissions should be received by us **on the final Friday in April, the year following the Regulatory Year in question. Six hard copies of the Submissions should be received by us by the Friday of the first week in May** (the hard copies should be prepared so that they can be easily placed in an A4 ring binder file). All Submissions should be sent to our office in London for the attention of RIIO Electricity Distribution, Networks and emailed to RIIO.Implementation@ofgem.gov.uk.

5.6. We will not consider any Submissions that are received after the deadline date, unless the network company has consent from us for late submission. We will only consider requests for late submission in exceptional circumstances.

5.7. The network companies' Submissions and the Consultant's Reports will be published on our website. We will also publish any supplementary questions asked by the Internal Team as well as the answers provided by the network companies. The network companies should highlight any information that they consider to be confidential. If a network company's Submission includes information that the network company considers to be confidential, then the network company should provide an alternative redacted version of their Submission for us to publish.

Ofgem confirmation of arrangements

5.8. We will confirm the name of the independent third party appointed by us to critically assess the network companies against our high-level Consumer Vulnerability Criteria and the date of the their site visit by the final Friday in April.

5.9. We will confirm the name of the panel members and the date of the Panel Session by the final Friday in May.

6. Converting the Overall Panel Score into a financial reward

Chapter Summary

This chapter outlines how the Overall Panel Score will be converted into a financial reward.

6.1. Under this incentive, a network company may receive a financial reward depending on the quality of its stakeholder engagement and consumer vulnerability activities. The value of any financial reward is directed by us, pursuant to CRC 2C Broad Measure of Customer Service Adjustment of the electricity distribution licence (in 2012/2013 prices).

6.2. Performance is assessed by an independent panel of consumer and stakeholder engagement experts – the Panel. In making its assessment, the Panel awards an Overall Panel Score out of 10. We convert the Overall Panel Score, into a financial reward, as per the following formula:

If $OPS \geq 9$, then $SE_t = MSER$

If $OPS < 4$, then $SE_t = 0$

If $OPS \geq 4$ and < 9 , then $SE_t = MSER \times ((OPS - 4) \times 0.2)$

Where:

SE_t the positive adjustment (if any) to Allowed Distribution Network Revenue in Regulatory Year t in relation to stakeholder engagement performance, pursuant to the provisions of Part G of CRC 2C Broad Measure of Customer Service Adjustment of the electricity distribution licence.

$MSER$ Maximum stakeholder engagement reward (£m, in 2012/13 prices) outlined in Table 16 of CRC 2C of the electricity distribution special licence conditions.

OPS The Overall Panel Score calculated in accordance with paragraph 4.7 to 4.13 of this document.

6.3. The formula states that any network company that scores below 4 out of 10 will not receive a financial reward. Any network company that scores 9 out of 10 or above will receive all of their financial reward. There is a straight line incentive rate between these two values.

6.4. This approach rewards good performers, does not reward weaker performers, and ensures that excellent performers are able to realise 100 per cent of their incentive.

7. Glossary

Broad Measure of Customer Service

The RIIO-ED1 Broad Measure of Customer Service incentive drives network companies to deliver good customer service, engage with stakeholders and address consumer vulnerability issues. It comprises of a customer satisfaction survey, a complaints metric and the SECV incentive. For more information on the Broad Measure of Customer Service please see Chapter 6 of the Strategy decision for the RIIO-ED1 electricity distribution price control - Outputs, incentives and innovation.⁴

Consultants

An independent third party appointed by Ofgem (but funded by the network companies) that will critically assess the network companies against our Consumer Vulnerability Criteria, in accordance with paragraphs 4.16 to 4.24 of this document.

Consultant's Report

A report produced by the Consultants to outline the result of their assessment of the network companies against the Consumer Vulnerability Criteria.

Consumer Vulnerability Criteria

The Consumer Vulnerability Criteria are the criteria that the Consultants will use to assess the network companies performance addressing consumer vulnerability issues. The Consumer Vulnerability Criteria are outlined in paragraph 4.16 of this document.

Consumer Vulnerability Sub-Criteria

The detailed sub-criteria that form the Consumer Vulnerability Criteria. The Consumer Vulnerability Sub-Criteria are stated in Appendix 2 of this document.

Internal Team

A team of Ofgem employees that will critically assess network companies against the Minimum Requirements, in accordance with paragraphs 4.2 to 4.6 of this document.

4

https://www.ofgem.gov.uk/sites/default/files/docs/2013/02/riioed1decoutputsincentives_0.pdf

Minimum Requirements

The Minimum Requirements are the basic requirements that network company must meet to be eligible for a reward. The Minimum Requirements are outlined in paragraph 4.2 of this document.

Overall Panel Score

The overall score awarded to each network company by the Panel, in accordance with paragraphs 4.7 to 4.13 of this document.

Part 1 Submission

Part 1 Submission is aimed at demonstrating that the network company meets the Minimum Requirements. More information on the contents this document and the assessment process can be found in Chapter 3 and 4 of this document.

Part 2 Submission

Part 2 Submission is aimed at demonstrating the network company's performance against the Panel Assessment Criteria. More information on the contents this document and the assessment process can be found in Chapter 3 and 4 of this document.

Part 3 Submission

Part 3 Submission is aimed at demonstrating the network company's performance against the Consumer Vulnerability Criteria. More information on the contents this document and the assessment process can be found in Chapter 3 and 4 of this document.

Panel

The Panel Members and Panel Chair that will assess the network companies' Submissions against the Panel Assessment Criteria.

Panel Chair

A non-scoring Ofgem employee that is appointed to chair the Panel. The Panel Chair will oversee the Panel's assessment and will lead the Panel Session.

Panel Member

An individual with stakeholder engagement and consumer vulnerability expertise appointed by Ofgem to sit on the Panel.

Panel Assessment Criteria

The Panel Assessment Criteria are the criteria that the Panel will use to assess and score the network companies' performance engaging with stakeholders and consumer vulnerability issues. The Panel Assessment Criteria are outlined in paragraph 4.9 of this document.

Panel Session

A meeting of the Panel to discuss the Submissions, assess performance against the Panel Assessment Criteria, and determine an Overall Panel Score for each network company.

Priority Service Register

Means the register containing details of Priority Services Register consumers that must be established and maintained by the licensee in accordance with standard condition 10 (Special services and complaints procedure) of the electricity distribution licence.

Regulatory Year

Means a period of twelve months beginning on 1 April in any calendar year and ending on 31 March of the following calendar year.

Stakeholder Engagement and Consumer Vulnerability (SECV) Incentive

The SECV Incentive drives network companies to engage with stakeholders and address consumer vulnerability.

Stakeholder Engagement and Consumer Vulnerability (SECV) Incentive Guidance

The SECV Incentive Guidance sets out the regulation, governance and administration of the SECV Incentive. This document is issued by the Authority under Part H of the relevant licence condition (Charge Restriction Condition (CRC) 2C. Broad Measure of Customer Service Adjustment). This document may be revised and reissued in accordance with Part H of CRC 2C.

Submission

The network company's combined Part 1 Submission, Part 2 Submission and Part 3 Submission.

Vulnerable consumers


As defined in our Consumer Vulnerability Strategy,⁵ a vulnerable consumer is a consumer whose personal circumstances and characteristics combine with aspects of the market to create situations where he or she is:

- Significantly less able than a typical consumer to protect or represent his or her interests in the energy market; and/or
- Significantly more likely than a typical consumer to suffer detriment, or that detriment is likely to be more substantial.

⁵ Our Consumer Vulnerability Strategy;
https://www.ofgem.gov.uk/sites/default/files/docs/2013/07/consumer-vulnerability-strategy_0.pdf

Appendix 1: Part 1 - Entry Form

Please complete the following Entry Form alongside your Part 1 Submission.

STAKEHOLDER ENGAGEMENT AND CONSUMER VULNERABILITY INCENTIVE SCHEME	
 Making a positive difference for energy consumers	
PART 1 SUBMISSION ENTRY FORM	
COMPANY DETAILS: (please complete)	CONTACT DETAILS: (please complete)
Company: Licensee(s):	Name: Title: Telephone: Email:

MINIMUM REQUIREMENTS		
Please provide supporting evidence and high level overview of how your company has met the Minimum Requirements set out below:	Evidence referred to within application (ie, evaluation, assurance report, survey, etc.)	Overview of your arguments demonstrating compliance with requirement. Clearly signpost as to additional relevant evidence/ information within Submission
The network company has comprehensive and up-to-date stakeholder engagement and consumer vulnerability strategies.		
A broad and inclusive range of relevant stakeholders have been engaged. This specifically includes engaging with challenging or hard-to-reach stakeholders (eg community energy).		
The network company has used a variety of appropriate mechanisms to inform and engage their stakeholders – these have been tailored to meet the needs of various stakeholder groups, and are fit for purpose in allowing a detailed analysis of a breadth of stakeholder perspectives.		
The network company can demonstrate it is acting on input / feedback from stakeholders.		
The network company can demonstrate that stakeholder engagement has led to positive outcomes for stakeholders.		

Appendix 2: Detailed Consumer Vulnerability Sub-Criteria

These are the scoring requirements to be used for each of the sub criteria.

A: Strategic understanding and commitment to the role that network companies can play in tackling social issues relevant to vulnerable consumers				
	Weak	Fair	Good	Excellent
Understanding of the definition of a vulnerable consumer and awareness of the range of social issues	Understanding of vulnerability restricted to a general definition of vulnerability. Little or no knowledge of what vulnerability looks like for the network company's consumer base. General poor awareness of the social issues that vulnerable consumers face.	Basic understanding of vulnerability across its consumer base. Largely focussed on the key vulnerability characteristics Good awareness of the range of social issues associated with the industry relevant to vulnerable consumers in general. For example, the network company's focus is not restricted solely to 'fuel poverty', but takes other issues such as 'vulnerability to a power cut' into account.	Network company aware that there isn't a 'one-size fits all' approach to vulnerable consumers. Good understanding of the main 'vulnerability issues' facing its consumers Good awareness of the social issues associated with the industry that are most prevalent across its vulnerable consumer base.	Enough flexibility to adapt to differences in vulnerability and changing needs of vulnerable consumers. Network company also thinking about issues external to the energy industry which could affect the vulnerability of consumers to energy issues or the utilisation of partner organisations.
Recognition and integration of role in relation to social issues	Recognition of social role confined to generalised statements. Limited integration into overall business strategy.	References to social role within strategy but tendency to treat as 'add on' aspects of business strategy and practices rather than integral aspect of service development and delivery. Limited use of targets to basic targets to improve performance and increase impact.	Fully integrated understanding of social role with clear plans for developing systems and consumer facing services to reflect role with targets for improved performance and increased impact.	Delivering on social role a key business driver underpinning design, planning and delivery of all services with core objective to 'make the most of what network company does' to tackle relevant social issues. Network company has challenging targets to improve performance and increase impact.

B: Engagement with stakeholders to improve the data⁶ and information that they hold on vulnerable consumers and what they do with it				
	Weak	Fair	Good	Excellent
Acquisition and Management	No clear link between network company's stakeholder engagement programme and data acquisition strategy. Latter largely based on existing PSR and associated PSR 'recruitment' systems. Basic data and information management strategy in place, but not always implemented.	Clear link between Stakeholder Engagement programme and the network company's data acquisition strategy, but the former is not fully utilised in the development of the latter. Data and information management strategy an integral part of network company's wider data and information strategies. Evidence of good progress in keeping records up-to-date. Awareness of data gaps and processes in place to address these. Some consistency between data sources still exists.	Stakeholder engagement programme is fully utilised in developing the network company's data acquisition strategy. Broad and inclusive range of stakeholders are engaged using a variety of appropriate mechanisms. Data acquisition carried out by the network company in a timely and systematic way. Data and information updating strategies working very well. Good progress in closing previously identified data gaps. No data source consistency issues.	As 'Good', plus Stakeholder Engagement programme includes challenging and hard-to-reach stakeholders, using mechanisms fully tailored to meet the needs of various stakeholder groups.
Use	Ad hoc use of data to enhance insight but no strategic approach to consumer insight to enable targeting work to address vulnerability and support social role.	As 'Weak', plus basic systems in place to keep track of data use and some feedback to data acquisition and management strategies.	Clear evidence of how data use is influencing and improving service development and delivery. Extensive system of use checks across all data and information with evidence of a feedback loop to data acquisition and management strategies.	As 'good' plus using data to assess future risk of vulnerability and shape partnerships with other relevant organisations. Clear strategy underlying the feedback loop to data acquisition and management strategies.

⁶ In accordance with the requirements of the Data Protection Act.

C: Approach taken to management and use of PSR and associated services

	Weak	Fair	Good	Excellent
Eligibility and take up of the PSR	<p>Eligibility for the PSR is largely confined to the “core” eligible groups defined by Ofgem.</p> <p>Basic reactive PSR recruitment programme by the consumer-facing services team when contact with a consumer is made who displays possible vulnerable circumstances.</p>	<p>Well-managed PSR list with some evidence of strategic approach to eligibility outside of the “core” groups.</p> <p>Basic advertising of the PSR and the services offered, e.g. posters and leaflets, in key locations linked to vulnerable consumers, e.g. doctors’ surgeries.</p>	<p>Informed by good data analysis, network company is proactively identifying vulnerable consumers outside of the “core” groups, fully reflecting fact that vulnerability can be complex and multidimensional.</p> <p>Targeted advertising of the PSR and the services offered to vulnerable consumer groups.</p>	<p>As ‘good’ plus approach reflects fact that vulnerability may be transitory, providing options for temporary access to PSR and ensuring that those consumers who are no longer eligible (due to temporary nature of their vulnerability) are taken off the PSR list.</p> <p>Extensive PSR recruitment programme, drawing on data and information sources to proactively identify and contact eligible consumers.</p>
Services offered to consumers on the PSR	<p>PSR services are restricted to the minimum list of services defined by Ofgem.</p>	<p>Limited additional services offered with some links to the needs of the “core” eligible groups of consumers that have been defined by Ofgem.</p> <p>Network company able to provide basic justification of the practicality of offering these services and how they ‘add value’ for these groups of consumers.</p>	<p>A wide range of additional services offered that clearly reflect the specific needs of the “core” eligible groups of consumers. Detailed analysis of need undertaken which demonstrates how these services reflect the complex and multidimensional nature of vulnerability. Some additional services also offered for PSR consumers outside of these “core” eligible groups.</p>	<p>A full range of additional services developed according to detailed needs analysis of all PSR consumers and the nature of their vulnerability. Approach also reflects the fact that vulnerability may be transitory. Full justification for how these services add value to the associated group of PSR consumers.</p>

D: Approach taken to develop and utilise partnerships (e.g. referral networks) to identify and deliver solutions (both energy and non-energy) for vulnerable consumers				
	Weak	Fair	Good	Excellent
Overall partnership strategy	Some links with other services for vulnerable consumers and partnerships to improve cross-referrals, and some participation in referral networks in area when invited. However, no clear strategy.	Clear strategy towards developing partnerships with relevant organisations, including ideas about what can be achieved from these partnerships in relation to the identification of vulnerable consumers, and identification and delivery of solutions.	Clear strategy towards both developing partnerships with relevant organisations and how to utilise these partnerships when they are in place. Strategy informed by evidence of benefits of existing partnerships on vulnerable consumers.	As good, plus fully utilising existing partnerships with other organisations. Network company aware of the limitations of existing partnerships and the wider limitations on the network company in relation to expanding those partnerships. Partnership strategy includes plans to overcome these limitations, where possible.
Developing partnerships	Participation in partnerships with a limited range of organisation types, largely within the utility sector. Partnerships provided limited support for the “core” groups of vulnerable consumers.	Wide range of partnerships extending beyond the utility sector. Partnerships provide some support to most groups of vulnerable consumers.	Extensive range of partnerships, with a wide variety of organisation types. Partnerships provide full and effective support for all groups of vulnerable consumers.	
Utilising partnerships	Partnerships largely restricted to referral and signposting.	Partnerships utilise data and information flows where appropriate, but these flows are largely one-sided and can be infrequent.	Network company has leading role in the partnerships that it has developed, with the organisations working together to identify vulnerable consumers and identify solutions.	As ‘good’, but network company is utilising these partnerships in an effective way to not only identify solutions, but also deliver solutions without creating unnecessary work for the network company.

E: Embedding their strategy for addressing consumer vulnerability in their systems, processes and how they manage consumer interactions				
	Weak	Fair	Good	Excellent
Embedding strategy in managing consumer interactions	Consumer-facing services and associated processes show only a basic reflection of the network company’s social role. They do not focus on capturing information to identify vulnerabilities beyond basic PSR recruitment.	Consumer-facing services routinely capturing information on consumer needs and vulnerabilities to support tailoring of PSR services and work with partners for further support to limited range of services delivered by others.	Consumer service staff trained in identifying and responding to consumer vulnerabilities with a range of network company and partner services, selected to meet wide range of consumer needs and circumstances.	As ‘good’ with social role a key aspect of consumer services and front-line staff training and service design, with all front-line staff trained to identify and record consumer vulnerability with access to a wide range of responses developed and available to support consumers. Evidence that staff have the flexibility available to ‘do right thing’ for any consumer (to meet evident need) and are empowered to focus on areas where they can be most effective.

E: Embedding their strategy for addressing consumer vulnerability in their systems, processes and how they manage consumer interactions (continued)				
	Weak	Fair	Good	Excellent
Embedding strategy general systems and processes and awareness of impact and effectiveness of actions.	<p>Basic reflection of network company's role into general systems and processes throughout the business. Very little information therefore provided from consumer facing services to other business systems and processes.</p> <p>Network company able to provide little justification as to why its chosen actions address social issues relevant to vulnerable consumers.</p>	<p>Clear feedback loop, with the information captured on consumer needs and vulnerabilities being reflected in network company's stakeholder engagement strategy, work around the PSR, and its partnership strategy. Network company able to provide basic justification as to why its chosen actions address social issues relevant to vulnerable consumers. Basic understanding of any areas where it is currently falling short and could improve its performance. Lack of clarity around plans to address shortcoming and/or barriers to performance improvement.</p>	<p>As 'fair', plus services routinely monitored and evaluated to test extent to which they are meeting consumer needs. Feeds into wider service design and other general systems and processes throughout the business. Full senior management buy-in to the network company's strategy in this area.</p> <p>Network company provides more justification than "Fair", but is not able to fully justify why its chosen actions address social issues relevant to vulnerable consumers. Network company has clear plans to address shortcomings and/or barriers to performance improvement it is currently facing.</p>	<p>High level of integration of the network company's role into general systems and processes throughout the business. Very clear feedback loop between the monitoring and evaluation of services by the consumer-facing teams to the overall strategy in relation to social issues relevant to vulnerable consumers. Evaluation not restricted to retrospective assessment of activities or quantitative assessment of activities.</p> <p>As 'Good', plus network company able to fully justify why its chosen actions address social issues relevant to vulnerable consumers and demonstrate why these 'add value' and are more effective over alternatives.</p>