



Customers in Vulnerable Situations Strategy

Updated June 2022

**we are
the network**

Contents

Introduction: Looking after our customers in most need	3
Stakeholder Influence	5
Our track record during RIIO- GD1	7
Our strategic approach to vulnerability	10
Our commitments for RIIO-GD2	12
Minimum Standards: Example 1	
Business as usual: Example 2	
Over and above: Example 3	
Measurement and benchmarking	18
Additional information on key new outputs for GD2	
Customer and Vulnerability Competency Framework	19
Hardship Fund	23
Proposal to assess positive outcomes for fuel por connections customers	TBC
Vulnerable Customers Strategy Stakeholder Feedback Survey	26

Introduction: Looking after our customers in most need

As a responsible organisation we recognise, and have a responsibility to support communities and individuals facing difficulties, both directly impacted through our operational activities, and also more broadly within the communities we serve in our network, ensuring that we look to identify and support those that need a little extra help.

We have developed our Community Promises that challenge our entire business to come up with solutions to the blockers that get in the way of us making a real and sustainable improvement to people's lives. Forming lasting partnerships with local government, other utility companies, community organisations and both national and regional charities is already an intrinsic part of our business, and this will be fully supported by our corporate responsibility activities.



Above all else, we want to demonstrate a sustainable approach that delivers long-term positive benefits while minimising the negative impacts of our day-to-day activities on the environment, local communities and economy. Our culture is already one of personal and corporate accountability and this promise will ensure everyone knows, internally and externally, why we're doing what we're doing, what our greater goal is and how they can help us get there.

In 2013 we were proud to have developed our Customer Strategy which was specifically designed to recognise a one-size-fits-all approach simply isn't right, and often doesn't work. We needed to make sure that our business was geared up to have a suite of solutions and support for the full spectrum of customer groups that we serve each and every day. A key facet of our strategy was to conduct exploratory research into 11 unique customer personas identified to understand their needs and expectations and how we could better serve them in the future.

Within the Northern Gas Networks region we serve 2.7 million gas-using households, of which currently over 500,000 are registered on the Priority Services Register. The socio-economic characteristics of our region means that we operate in many communities that are amongst the most economically deprived in the whole country. This was a key factor in us prioritising engagement with vulnerable and hard to reach groups of customers about our services, about what we do and how we could improve. The rigour of the research conducted crucially assisted us to better understand the drivers and impacts of vulnerability.

Given that 1 in 5 customers may need extra support during interactions with NGN¹, and we only might serve that customer once in their lifetime, it is essential that we have strategy that focusses wholly on looking after our customers in vulnerable situations. Our strategy also takes account of the vulnerable situations that occur beyond and outside registration on the Priority Services Register, and also beyond our core function of managing the local gas distribution network.

We understand that vulnerability is complex, and can be transitory and multi-faceted. It cannot be pigeon-holed and prescriptive, but must be looked at through a flexible, wide-eyed, and innovative lens. Vulnerability is not just singular; it could be a whole household that needs extra support, or indeed a whole community, during a large scale interruption.

Our research has highlighted that issues around vulnerability are dynamic, particularly in a rapidly evolving environment such as the energy sector. Changes within the energy market can prevent or slow down customers from moving out of fuel poverty. These market factors can impact individuals, households and communities in very different ways, and we need to be mindful to these with the approach that we take. Our strategy supports:

- Individuals/households that have been directly impacted by our services;
- Individual/households that may need extra support to access our services;
- Colleagues to proactively recognise and act on indications of vulnerability; and
- Individuals/households/communities that are off-grid.

¹ Reflected in the volume of customers in our region who have already signed up to the Priority Services Register to access additional support services.

Stakeholder Influence

More than any other priority in our plan social responsibilities have polarised opinion amongst our stakeholders. Through extensive engagement we have learned it is difficult to gain consensus on which vulnerable customer segments are perceived to be most in need of support. This uncertainty, combined with strong performance, constrains the extent to which customers are willing to pay for additional improvements to our current offering, should investment have a significant bill impact. Notwithstanding these challenges our stakeholders agree that we have a social responsibility to reach out to customers who find themselves in vulnerable circumstances and support them.

There are several useful definitions of vulnerability that our national stakeholders have helped us identify as being relevant in developing and delivering our strategy, including those provided by Ofgem and organisations such as the Money Advisory Trust. However, our local stakeholders have also highlighted that we need to:

- Be careful not to restrict our definition or understanding of the circumstances that can contribute to vulnerability; and the causes of vulnerability can change and adapt, making it more important that we are agile and quick to respond.

“Humanise decisions instead of ticking boxes as circumstances fluctuate.”

Whilst we understand that vulnerability is complex, in practical terms, we have developed 5 broad categories which support our colleagues to recognise and embed our strategy;

1. Physical challenges , inclusive of communication issues, physical space.
2. Mental wellbeing
3. Temporary vulnerability
4. Rural vulnerability
5. Financial hardship.

“People who know they’re vulnerable will come to you, but the people who don’t know, that’s where you have to go and reach out to them.”

Meaningful engagement with our stakeholders has elicited clear preferences:

- A **flexible definition of fuel poverty and vulnerable circumstances** so that each individual’s situation and unique circumstances can be interpreted in isolation.
- **Support provided to all customers, including off-gas households.**
- An **awareness-access-action** framework to assist in meeting social obligations.
- Ensure that initiatives are **‘joined up’** such as offering a suite of support to fuel poor connections to maximise social benefits
- **Partnerships with trusted local community organisations** leveraged to reach customer segments and promote key messages more effectively and efficiently.
- **Co-ordinate** with local utility providers bringing silos together to avoid duplication of effort and deliver stackable benefits.
- Continue to develop a rich **portfolio of tailored initiatives** to meet the needs of a broad range of customers experiencing different vulnerable circumstances.
- Strong support for our policy which gives every colleague the opportunity to take two days’ paid leave each year to undertake **volunteering activities.**
- **Don’t try to replace** social services or the NHS.

“If you’re doing a gas central heating system you need to check they’ve energy insulation in the loft and walls as well.”

Our stakeholders have told us that vulnerability can be introduced or exacerbated during a supply interruption and that the best form of additional support we could offer is a dedicated phone line for customers who find themselves in vulnerable circumstances.

In our wider stakeholder engagement programme we have heard very strongly how safety is at the forefront of stakeholders’ minds. Stakeholders see a strong correlation between safety and our social obligations and have told us that it is essential we continue to raise awareness of Carbon Monoxide because doing so saves lives. They have also been very clear that when undertaking our normal activities, in addition to Carbon Monoxide awareness, our frontline staff should provide energy efficiency advice or referrals, to make every contact count.

“NGN should lead the fight on CO awareness”

Taking account of all this feedback, we developed our suite of outputs for the RIIO-GD2 Business Plan, and our ‘Customers in Vulnerable Situations Strategy’. We then conducted a final piece of engagement in August 2019 to gain feedback on our overall approach. Full details of this research have been included on pages XXXX, but the headline results were:

- 1) There is very strong support for NGN’s framework for identifying and addressing the needs of groups of vulnerable customers, including Physical challenges; Mental wellbeing; Temporary vulnerability; Rural vulnerability and Financial hardship.
- 2) There is good support for NGN’s strategic approach and proposed support and commitments for vulnerable customers.
- 3) There are a range of suggestions for how the approach and commitments can be further strengthened and widened, and these include:
 - language needs, notably of BAME communities and in inner city areas
 - the needs of disabled people (e.g. for visually impaired and blind people)
 - identification of and communication with vulnerable people not on the PSR
 - Further consideration of the challenges of dementia
 - Further consideration of needs and problems associated with cold homes/fuel poverty
 - The importance of training beyond awareness raising
 - A joined-up approach that works with other partners in the community, business, public sector and health organisations and Infrastructure North partners.

These suggestions have all been acted on through our GD2 output commitments and finalised Customers in Vulnerable Situations Strategy.

Our Track Record during RIIO-GD1

Looking after our customers in vulnerable situations has been a key focus for NGN during GD1. Consistently delivering over and above what is required of us through the regulatory targets, we have been at the forefront of delivering an exceptional level of service.

Our current obligations:

GD1 obligations	GD1 Performance
Number of Fuel Poor Connections: Ofgem Target: 14500 NGN Stretch Target: 16000	We've delivered 13,500 fuel poor connections to date, and are confident that we will exceed the Ofgem target and meet the NGN stretch target. Customers provided with a fuel poor connection on average save £350 off their annual house-hold energy bill.
Raise awareness of carbon monoxide	We've conducted over 22,000 doorstep awareness surveys since 2013 to measure the impact of our frontline colleagues' interventions on customers' awareness of carbon monoxide. Stakeholder feedback has demonstrated awareness increases from 6.9/10 to 9.3/10, as a result of our efforts, as scored out of 10 by our customers
Other	Jointly with our partner NPG, we make available £100,000 per year to charities to help provide services for our hard-to-reach customers, in partnership with Northern Power Grid. Awarding criteria is based on a number of key outcomes including: alleviating fuel poverty; raising awareness of carbon monoxide; developing energy efficiency or promoting the Priority Services Register.

Our culture of continuous improvement has been recognised through the Discretionary Reward Scheme. Over the two DRS schemes (2013-15 and 2015-18) so far in GD1, NGN received the most awarded to any GDN as recognition of the initiatives delivered during the period.

During RIIO-GD1 we have been ambitious in terms of reach and scale – demonstrated through some example case studies.

Carbon Monoxide: BPEC Accredited CO Awareness Course.

- We have trained all front-line emergency engineers to deliver customer awareness information as part of our 'make every contact count' strategy
- In 2016 we became the first (and only) gas distribution business to be recognised as a British Plumbing Employers Council (BPEC) accredited training provider

- To date, we have trained over 20 external organisations about the risks and symptoms of CO, who have then reached in excess of 7,000 ‘at risk’ customers – and these are customers that we would have been unlikely to reach through our usual day to day activities

Fuel Poverty: Warm Hubs

- Launched our Warm Hub community project in 2015
- Objective is to help residents facing fuel poverty, isolation and loneliness in rural, off-grid communities
- Warm Hubs provide warm, friendly places, staffed by volunteers where vulnerable residents can go to socialise, get warm, have a hot meal and access information, advice and referrals to relevant support
- The sustainability of Warm Hubs affirms its success: the initiative is flourishing, attracting on-going support beyond our initial investment
- 26 Warm Hubs have been established so far and awarded £750k of external funding

Evolution of Community Partnering Fund

- Launched £50,000 per year Community Promises Fund in 2015
- This fund is open to community/charitable organisations to deliver projects that meet both our own and their objectives
- In 2018, joined forces with Northern Powergrid and evolved to the Community Partnering Fund – this increased the fund to £100,000 per year
- Helps reach customers and communities that we wouldn’t see through our day to day activities
- In 2017/18, 47 applications received, 9 projects supported, 3 new jobs created, 24 volunteers engaged, over 3000 direct beneficiaries

Staff Training to identify and address Vulnerability

We have built an army of ‘Care Colleagues’ during RIIO-GD1, by partnering with specialist organisations to help spot signs of vulnerability and provide appropriate support and referrals. This has included:

- Partnering with the Alzheimer’s Society, and have trained 17 colleagues to be Dementia Champions, who in turn have trained 360 colleagues to become Dementia Friends
- Partnering with the Royal National Institute for the Blind, creating an awareness package that can delivered to all our colleagues.
- Companywide vulnerability awareness sessions are available to all colleagues, covering both how to recognise signs of vulnerability, and how to best support our customers most in need.
- ‘Safeguarding’ training with ‘The Children’s Society’ - helping colleagues to recognise potential signs of neglect and abuse while working in homes across the region. We opened this training up representatives from Northern Powergrid and Northumbria Water.

Speeding up and increasing customer compensation payments.

Whilst our focus in GD1 has been to get things right first time, we know it is equally important to compensate customers when things go wrong. We have:

- 2015/6 - First and only GDN to introduce a voluntary standard of service to compensation customers left off gas overnight;
- 2016/7 - Led changes to the system used by all GDNs to make additional voluntary payments possible
- 2017/8 - First GDN to voluntarily double all GSOP payments if we fall short of our guaranteed standards. (Compensation levels were set in 2005, and have not kept up with inflation);
- 2017/8 - Improved the Loss of Business compensation provide by simplifying the information available, and speaking proactively to businesses impacted. This led to a 48% increase in success claims being submitted.

Our stakeholders such as Citizens Advice continue to encourage us to make further efforts to make our customers aware of the Guaranteed Standards and how to claim against failures to meet them. In response we have:

- 2018/9 – We were the first GDN to make proactive payments for the 2 GSOP standards that customers need to claim for;
 - GSOP 3 - provision of alternative heating and cooking within 4 hours of a supply interruption for PSR customers. Commencing in October 2018, this standard was prioritised as it directly impacted vulnerable customers. So far we have paid £10,994 to Priority Service Register Customers via 228 compensation payments.
 - GSOP 13 – advance notification of planned works. Payments started in January 2019. So far we have paid £15,800 to customers who we failed to notify of planned work within the prescribed time limits via 395 compensation payments.

Our Strategic Approach to Vulnerability

Working with our Stakeholders and building on their input and feedback, we have reshaped our existing vulnerable customer strategy. We have developed, with the help of our stakeholders, the following 'AAA' framework to help us support our customers in vulnerable situations.



By adapting this principles-based approach into our AAA framework, we will ensure that all customers are treated fairly and consistently.

The principles of the AAA framework are:

Awareness: We will make sure that colleagues and customers are aware of all the services that we can offer.

An integral part of our Customers in Vulnerable Circumstances Strategy is to make sure that all our colleagues are equipped to recognise the signs of vulnerability, and be able to either provide help and support there and then, and to understand all the referral networks that we have in place to help customers further.

We also understand that partnership working is key to helping our customers understand who we are, and how we can help support those in most need. Through RIIO-GD1 we have built strong relationships with partner organisations. We created a pioneering and unique collaborative framework with the three other main utility infrastructure providers – Yorkshire Water, Northumbria Water and Northern Power Grid. Infrastructure North² was launched in 2013, it has 5 key ambitions which includes looking after the most vulnerable people in our society and playing our part in the wider social agenda.

In GD2 we will continue to improve the capacity of our colleagues, draw on the strength of existing partnerships, and be strategic in the creation of new partnerships, to make not only the services that NGN can offer more visible, but also to collaborate more to make our combined service position clearer for our customers in vulnerable situations.

Accessibility: We will make sure that our services are easy to access and clearly explained.

We will ensure that colleagues have access to services that directly support the customer, and that customers can easily access these services through their preferred channels of communication. Colleagues will be empowered to signpost appropriate referral services and we will continue to develop strategic partnerships to help reach our 'most in need' customers.

² <http://infrastructurenorth.npproduction.net/safewarmincontrol/wp-content/uploads/2014/05/Stay-warm-healthy-and-in-control.pdf>

From a customer perspective, we know that many people do not consider themselves as vulnerable, and therefore may not identify that they needed any additional help or support. Experience of working with a wide variety of consumer needs has shown us that often, customers want to be able to act independently and help themselves.

Our approach will make sure that customers are given every opportunity to access essential services themselves. We will partner with organisations that customers trust, to make sure that we can provide help to customers who may not necessarily identify as being in a vulnerable situation, or be able to access that help independently.

Action: We will make sure that our actions are outcome focussed.

Key to the success of our Customers in Vulnerable Situations framework will be having a clear set of actions that directly benefit the customers that we are seeking to help. Whilst we are confident that our output commitments represent an ambitious and value-adding proposition for vulnerable customers we are keen to ensure that we continue to push the frontiers of performance.

Examples of how actions will be assessed is detailed in Measurement and Benchmarking

Our Commitments for the RIIO-GD2 Period

Stakeholder input has been central to the development of our commitments. We have heard and counterbalanced dissenting voices and pledged to invest our resources wisely, to ensure outputs derive the greatest possible social benefit. Our commitment to delivering successful outcomes is such that we have introduced new assurances, including but not limited to, only claiming the full Fuel Poor voucher value should the desired customer benefit be achieved.

Our commitments for GD2 have been set within our 'AAA' framework (where appropriate this framework has been referenced alongside the commitment) and each commitment for the RIIO-GD2 period can be placed in one of three categories:

1. **'Minimum Standards'** – these requirements include Licence Condition 0 principles and Guaranteed Standards of Service (GSOP) as the foundation for delivery of services to customers in vulnerable situations;
2. **'Business as Usual'** – We then build on these services by embedding our existing enhanced customer journeys and with improved day to day provisions; and
3. **'Over & Above'** – We have created bespoke commitments that are in direct response to stakeholder feedback

Category	Output	Awareness	Accessibility	Action
Minimum Standards	Licence Condition '0'	YES	YES	YES
	GSOP		YES	YES
	PSR Special Licence Condition D13		YES	YES
	Annual Showcase Event	YES	YES	
Business as Usual	1,000 Fuel Poor Connections / Year		YES	YES
	10,000 CO Awareness Sessions / Year	YES		
	5,000 Eligible PSR Registrations / Year		YES	YES
	1,000 Energy Efficiency Referrals / Year	YES	YES	YES
	Enhanced Customer Journeys	YES	YES	YES
Over and Above	Stretch target of 2,000 Fuel Poor Connections / Year; and		YES	YES

	assessment of 500 FP connections against efficiency measures. Will only claim full voucher value is positive outcomes achieved.			
	Hardship Fund £150k / Year	YES	YES	YES
	Community Partnering Fund £50k / Year	YES	YES	YES
	Customer and Vulnerability Competency Framework	YES	YES	YES
	Dedicated 24/7 PSR Hotline		YES	YES
	100 Community Partners trained / year to deliver CO Safety advice, PSR referrals, Energy Efficient Advice and Referrals		YES	YES

Our continued commitment to achieve the BSI 18477 Inclusive Service Provision will validate and test the effectiveness of our strategic approach.

Below are examples detailing how the outputs will specifically map against our strategic framework.

Example 1 - Minimum Standards

Output: Licence Condition '0'

Awareness	Accessibility	Action
<p>Customer service arrangements:</p> <p>make it easy for a Customer to contact NGN;</p> <p>act promptly and courteously to put things right when NGN makes a mistake;</p> <p>otherwise ensure that customer service arrangements and processes are complete, thorough, fit for purpose and transparent; and</p> <p>seek to identify each Customer</p>	<p>Provide information (whether in writing or orally) to each Customer which:</p> <p>is complete, accurate and not misleading;</p> <p>is communicated in plain and intelligible language with more important information being given appropriate prominence;</p> <p>relates to products or services which are appropriate to the to whom it is directed;</p> <p>does not create a material</p>	<p>Behave and carry out any actions in a fair, honest, transparent, appropriate and professional manner</p>

in a Vulnerable Situation, in a manner which is effective and appropriate, having regard to the interests of the Customer;	imbalance in the rights, obligations or interests of NGN and the Customer in favour of the licensee; and is sufficient to enable the Customer to make informed choices about their supply of gas by NGN;	
--	---	--

Effectiveness to be measured through the BSI 18477 Inclusive Service Provision Framework

Example 2 - Business as Usual

Output: Enhanced Customer Journeys

Throughout RIIO-GD1 we have continually enhanced the services that we provide through our day to day activities. In 2013 we introduced the Customer Care Officer (CCO) role within our operational structure. We have 12 CCOs who work across our Network, offering specialist advice and support to our customers in vulnerable situations. To help make sure that we always taking account of what our customers need, we have sought regular feedback from our customers through a variety of different mechanisms.

Summary of mechanisms

Feedback Channel	Frequency	Internal/External	Qualitative / Quantitative	Regulated / Non regulated	Activities
Customer Satisfaction Surveys	Monthly	External	Quant	Regulated	Connections / Emergency/ Replacement
Complaints	Daily	Internal	Qual and Quant	Regulated	All activities
Enquiries	Daily	Internal	Qual and Quant	Non regulated	All activities
Customer Persona Research	2 per year	External	Qual	Non regulated	11 customer personas, in depth research to inform strategic approach. Vulnerable and Small Business Research were the first personas to be researched.
Bespoke activity surveys	As and when required – usually either 6 or 12 monthly	Internal / External	Quant	Non regulated	To seek feedback on service areas NOT covered by regulated Customer Satisfaction Surveys – e.g. live/dead checks; paid for disconnections

Bespoke activity surveys – collaborative with GDNs	As above	External	Quant	Non regulated	To seek feedback on service areas NOT covered by regulated Customer Satisfaction Surveys, but with customers that collectively serve all GDNs. E.g. UIP/IGT connections
Footpath Feedback	Daily	Internal	Quant and Qual	Non regulated	Conducted by our customers and colleagues – provided real time feedback on our daily activities.
Institute for Customer Service - accreditation	Every 18 months	External	Quant	Non regulated	Conducted every 18 months and results support benchmarking with all sector organisations
Benchmarking Survey	Monthly	External	Quant	Non regulated	Bespoke survey developed by Tti Global to support external benchmarking activities
External consumer reports	Periodically	External	Quant and Qual	Regulated / Non-regulated	E.g. Citizens Advice report on GSOP

Using this information alongside stakeholder feedback, we have mapped each of our key customer journeys, and identified further service improvements at each customer touchpoint for all customers and in particular, vulnerable customers.

Example: Planned work journey

	Minimum Requirement	NGN Enhanced
Site Survey - Awareness	Carry out Site Surveys prior to work commencing and identify which customers are registered on the PSR	Follow-up standard site surveys to identify issues of vulnerability not registered on PSR
Notification - Accessibility	Notification of interruption to supply 7 Working Days prior to start of work	Notify all identified vulnerable customers 15 working days prior to start of work. Offer face to face appointments
Work Execution - Action	Execute work as designed	Carry out work in accordance with any locally agreed requirements to minimise impact on vulnerable customers. Customer Care Officers (CCOs) on site to address issues as they arise.
Gas Supply Isolation - Action		Provide support as identified through site survey – heating/cooking/alternative accommodation. GSOP 3 – minimum standard
Gas Supply Restoration - Action	Internal standard to have all customers reconnected by an agreed time.	Vulnerable customers prioritised reconnection or at a time agreed with CCO. If 'in-house' difficulties occur e.g. gas boiler will not relight use referral routes or hardship fund to ensure we do not 'leave any customers behind' in the short or

		longer term.
Reinstatement - Action	2 Year guaranteed provided	Reinstate to timescales and arrangements agreed with CCO to address specific vulnerable customer needs.
Follow-Up - Accessibility		Final follow-up check by CCO in the days following work completion. Referral to partner organisations for any additional support, if needed

Example 3 – Over and above

Output: Train 100 Community Partners per year to deliver CO Safety advice, PSR referrals, Energy Efficient Advice and Referrals

Awareness: Through RIIO-GD1 our work to educate our customers on the dangers of Carbon Monoxide led to a broader strategic approach, which was to build a network of trusted, well trained partners to help us reach a wider audience with CO messages. In 2016, we became the only GDN accredited by the British Plumbing Employers Council (BPEC) as a CO training provider, allowing us to equip a network of colleagues and partners with the skills and knowledge to educate customers about CO risks and symptoms. Through this route we were able to reach ‘at-risk’ customers, who we would not necessarily serve through our day to day activities.

Building on this established blueprint, we have now broadened the training that we are able to provide, to include:

PSR Awareness and referrals

Energy Efficiency Advice and referrals

Our commitment for GD2 is that we will invest our time and expertise to train a minimum of 100 community partners each year, to deliver these key messages to customers and communities in most need. This will complement the work on education, awareness, and referrals that we already do through our day to day activities

Accessibility: It is essential that our colleagues and community partners can easily access this training. In RIIO-GD1 we received really positive feedback from our Community Partnering Fund applicants, as all were offered this specific training, delivered by NGN, regardless of whether their application had been successful or not. We also trained community partners working on schemes such as Warm Hubs. Our aim is to continue with this approach, and use the following the routes to make sure that this service is accessible to all:

- Training to be offered to all Community Partnering Fund and Hardship Fund partners.
- Training to be offered to all colleagues through the Customer and Social Competency Framework. Colleagues are encouraged to use their 2 volunteering days per year to deliver training to our community partners.
- Clear signposting to book training through key external routes, include NGN Website, Facebook, Twitter.

Action: By effectively training our colleagues and community partners, we will be able deliver positive outcomes for our customers in most need. Measures of success will include:

- Number of CO awareness sessions delivered, Increase in knowledge, evidence of behaviour change
- Number of eligible PSR customers identified and successfully registered
- Number of energy efficiency sessions delivered, and evidence of successful referrals.

Measurement and Benchmarking

To understand the effectiveness of our Customers in Vulnerable Situations Strategy, it is important that have suitable measurement and benchmarking in place.

Measurement:

We are currently working with Ofgem to develop a suitable set of criteria, that all GDNs can report on consistently. It is likely these measures will be closely aligned to the following:

- Number of Carbon Monoxide Awareness Sessions held; measurable awareness increase/behaviour change; reduction in CO related incidents
- Number of PSR referrals
- PSR Customer Satisfaction Survey score, across the three key performance areas (Planned work, unplanned work, connections)
- Number of Fuel Poor Connections, with assessment of tangible benefit/positive outcomes.
- Number of Energy Efficiency Advice sessions help, measurable behaviour change leading to cost savings, successful referrals for further help with in-house measures.

Benchmarking:

In addition to the consistent reporting measures, and annual showcase event, we will also be using a number of other routes to benchmark our approach and performance.

- **Business in the Community:** Responsible Business Tracker. This benchmarking activity recognises and assesses social value and business direction, aligning to the UN Sustainability Goals. We are currently undergoing the assessment, and expect our results in February 2020. This will allow us to benchmark across organisations from all sectors across the UK.
- **BSI 18477 Inclusive Service Provision.** This standard allows us to assess the provision of service against recognised best practice. We have held this standard since Jan 2019, and have committed to retain this standard through RIIO-GD2.

Additional information on key new outputs for GD2

Customer and Vulnerability Competency Framework

We have a business-critical requirement to make sure that all our engineers have the correct Safety and Technical Competencies (STCs) for the role that they are being employed to carry out. These are subject to rigorous internal and external audits, alongside day-to-day compliance reporting. In order to make sure that our colleagues feel equally well trained to identify and help customers in vulnerable situations, we have developed a **Customer and Vulnerability Competency Framework** that mirrors the existing STC process that will form part of the minimum competencies required of our colleagues to carry out their functions.

In order to help us reach the customers that need our help the most, we commissioned a piece of research to quantify the number and proportion of customers in the Northern Gas Networks area that could be classified as vulnerable through our defined list of criteria. An example of the data that this research developed is detailed in Table 1.

The data has been split across our nine operational areas within our region (Pennines; Bradford; Leeds; East Riding; North Riding; Tees; Wear; North Tyne; Cumbria) and all the local authority areas within these, with comparison to national averages. This data will allow us to better target who and what we train, with whom and where we forge partnerships, and finally how we make better investment decisions, for example – through the Community Partnership Fund and the NIA Vulnerability Allowance.

By using this information, we can provide bespoke training to each of our operational areas, based on the characteristics that are present within that particular area.

The framework modules cover areas such as:

- Fuel Poverty and Energy Efficiency
- Recognising and dealing with aspects of vulnerability
- CO Awareness
- Priority Services Register (PSR)
 - o Physical challenges
 - o Mental wellbeing
 - o Rural vulnerability
 - o Temporary vulnerability
 - o Financial hardship
- Talking to customers/ effective engagement
 - o Dealing with complaints
 - o Managing difficult situations

The framework is based on a three-year refresher cycle, and modules will be developed, implemented and reviewed regularly to ensure suitability for purpose.

Colleagues are required to complete with their managers or individually as appropriate the following:

- Enter their name
- Select the zone they operate in
- Select their job role or area
- Enter the date employment commenced/ date the framework starts from.

Entry of the above criteria will generate a training group (1-5) and a required credit value for each staff member for each framework year. It will also determine the dates of each of the three framework years for reporting purposes.

‘Modules Outstanding’ and ‘Zone Specific Training’ will also be populated with the training modules required to be completed over the course of the three-year framework. These modules are determined by the training group the staff member is a part of, and the zone in which they operate. For those staff who are *not* zone based, the table for ‘Zone Specific Training’ will remain blank.

As modules are completed, staff members (or managers if determined to be more appropriate) will input the date of completion and select from a drop-down menu the corresponding component completed. This will look-up the credit value associated with the module, remove it from the outstanding modules tables, and sum-up the credits completed within that framework year. As more modules are completed, the framework year total has been formatted to provide a visual representation of progress.

In addition to the modules assigned to each zone and training group, colleagues are also able to undertake additional tasks (possibly voluntary or outside the NGN work environment) which have been assigned a corresponding credit value.

In order to ensure appropriate controls and governance and effectiveness of the framework, the following will be applied;

Monthly reporting will be undertaken to identify;

- Training due in next 3 months
- Training due in next month
- Overdue Training

Measuring effectiveness, will be managed regarding delivery of training

- Assessment on completion of Computer based training pass/fail
- Evaluation sheets will be taken for face to face sessions delivered

Capturing outputs to ensure positive outcomes

- Tracking and measurement of CO awareness sessions delivered on the doorstep, monthly monitoring
- Increases in number of referrals to PSR, Monthly monitoring
- Energy advice referrals to partner organisations, Qtly reporting
- Capture of case studies, ad hoc
- Identification of suitable project/support opportunities from active engagement
- Retention of BSI 18477

An annual review will be undertaken to cover the following areas;

- Suitability of Training materials
- Externally drive changes
- Effectiveness of framework
- Value of credits applied

Table 1 – Sample of social indicator mapping by type and NGN area

Area	Average journey time to services - car (mins)	Dementia prevalence 65+		Learning disability - adults gaining support		Children with autism known to schools		Registered blind or partially sighted		People with hearing Loss	
		Number	%	Number	%	Number	%	Number	%	Number	%
Leeds/Leeds Patch Total	9.8	6,125	4.80%	2,120	0.35%	901	0.71%	4,540	0.58%	116,500	15.20%
Bradford	9.9	4,263	5.20%	1,670	0.43%	1,128	1.09%	3,070	0.57%	77,000	14.60%
Craven	12.8	544	4.20%	158	0.35%	101	1.22%	310	0.55%	12,500	22.40%
Bradford Patch Total	n/a	4,807	5.10%	1,828	0.42%	1,229	1.10%	3,380	0.57%	89,500	15.30%
Calderdale	10.3	1,553	4.10%	670	0.41%	350	0.93%	950	0.45%	35,500	17.10%
Kirklees	11.1	3,122	4.30%	1,305	0.39%	380	0.55%	1,895	0.43%	70,000	16.20%
Pennine Patch total	n/a	4,675	4.20%	1,975	0.40%	730	0.67%	2,845	0.44%	105,500	16.50%
Wakefield	10.1	2,609	3.90%	1,035	0.39%	848	1.50%	2,650	0.78%	58,500	17.70%
Hull	10.3	1,969	4.60%	735	0.36%	574	1.37%	1,700	0.65%	38,500	14.90%
East Riding	11.9	3,120	3.90%	975	0.36%	350	0.74%	2,115	0.63%	72,500	21.50%
Selby	11.8	845	4.20%	245	0.35%	157	1.22%	481	0.55%	15,500	18.20%
East Riding Patch total	n/a	8,543	4.10%	2,990	0.37%	1,929	1.19%	6,946	0.68%	185,000	18.30%
York	10.6	1,618	4.00%	440	0.26%	314	1.13%	1,075	0.52%	35,000	17.10%
Scarborough	10.6	1,042	4.20%	302	0.35%	194	1.22%	594	0.55%	24,500	22.70%
Harrogate	11.5	1,539	4.20%	446	0.35%	286	1.22%	877	0.55%	32,000	20.30%
Ryedale	15.4	522	4.20%	151	0.35%	97	1.22%	297	0.55%	12,000	22.80%
North Riding Patch total	n/a	4,721	4.10%	1,340	0.31%	891	1.18%	2,843	0.54%	103,500	19.80%
Sunderland	10	2,243	4.30%	820	0.37%	1,048	2.52%	1,830	0.66%	49,500	17.90%
County Durham	10.9	4,951	4.60%	1,845	0.44%	1,051	1.41%	3,530	0.67%	96,000	18.50%
Gateshead	10.1	1,925	4.80%	550	0.34%	417	1.39%	1,170	0.58%	36,000	18.00%
South Tyneside	10	1,432	4.80%	740	0.62%	369	1.67%	815	0.54%	28,000	18.80%
Wear Patch total	n/a	10,551	4.60%	3,955	0.43%	2,885	1.71%	7,345	0.64%	209,500	18.30%
Newcastle-upon-Tyne	9.4	2,055	5.00%	965	0.41%	599	1.35%	1,445	0.49%	42,000	14.50%
North Tyneside	9.5	1,910	4.60%	690	0.43%	350	1.14%	1,500	0.73%	37,500	18.50%
Northumberland County	12.7	3,104	4.10%	1,085	0.42%	630	1.38%	1,440	0.45%	65,500	20.70%
North Tyne Patch total	n/a	7,069	4.50%	2,740	0.42%	1,579	1.31%	4,385	0.54%	145,000	17.90%
Middlesbrough	10	1,023	5.00%	575	0.54%	326	1.34%	630	0.45%	22,000	15.80%
Darlington	9.8	1,067	5.10%	360	0.44%	244	1.48%	670	0.63%	19,000	18.00%
Hartlepool	9.5	865	4.90%	385	0.53%	193	1.27%	455	0.49%	16,500	17.80%
Redcar and Cleveland	11.7	1,225	4.50%	510	0.47%	281	1.28%	720	0.53%	26,500	19.60%
Stockton-on-Tees	10.7	1,644	5.40%	540	0.36%	387	1.16%	690	0.35%	33,000	17.00%
Hambleton	12.5	872	4.20%	253	0.35%	162	1.22%	497	0.55%	19,500	21.70%
Richmondshire	15.6	516	4.20%	150	0.35%	96	1.22%	294	0.55%	9,500	18.00%
Tees Patch total	n/a	7,212	4.90%	2,773	0.44%	1,689	1.28%	3,956	0.48%	146,000	18.10%
Allerdale	12.6	944	4.10%	258	0.33%	175	1.25%	602	0.62%	20,000	20.70%
Barrow-in-Furness	9.5	652	4.10%	178	0.33%	121	1.25%	415	0.62%	13,000	19.20%
Carlisle	10.7	1,052	4.10%	288	0.33%	195	1.25%	670	0.62%	20,500	19.00%
Eden	13.9	513	4.10%	140	0.33%	95	1.25%	327	0.62%	11,500	21.90%
Cumbria Patch total	n/a	3,160	4.10%	865	0.33%	585	1.25%	2,014	0.62%	65,000	20.00%

Table 2 - Initial role requirements including social indicator mapping by area

Example of role requirements and training framework								
To be completed over three year refresher period								
Training Group	Req'd Credits/yr	Core Module	Core Module (e-learning)	Fuel Poverty and Energy Efficiency	Recognising and dealing with aspects of	CO Awareness	Priority Services Register	Talking to customers/ effective engagement
Group 5	60	x		x	x	x	x	x
Group 4	50	x		x	x		x	x
Group 3	50		x					x
Group 2	30		x		x		x	
Group 1	30		x					
Group 5	Group 4	Group 3	Group 2	Group 1				
Core Module	Core Module	Core Module (e-learning)	Core Module (e-learning)	Core Module (e-learning)				
Fuel Poverty and Energy Efficiency	Fuel Poverty and Energy Efficiency	Talking to customers/ effective engagement	Recognising and dealing with aspects of	Core Module (Year 2 refresher)				
Recognising and dealing with aspects of	Recognising and dealing with aspects of	Core Module (Year 2 refresher)	Priority Services Register	Core Module (Year 3 refresher)				
CO Awareness	Priority Services Register	Core Module (Year 3 refresher)	Core Module (Year 2 refresher)					
Priority Services Register	Talking to customers/ effective engagement	Core Module (Year 3 refresher)	Core Module (Year 3 refresher)					
Talking to customers/ effective engagement	Core Module (Year 2 refresher)							
Core Module (Year 2 refresher)	Core Module (Year 3 refresher)							
Core Module (Year 3 refresher)								
Bradford	Cumbria	East Riding	Leeds	North Riding	North Tyne	Pennines	Tees	Wear
Dementia	Rurality	Literacy	Cultural Differences	Age	Dementia	Cultural Differences	Dementia	Unemployment and UC
Cultural Differences	Physical Health	Unemployment and UC	Mental Health	Rurality	Literacy	Mental Health	Unemployment and UC	Physical Health

Hardship Fund

Through our experience in RIIO-1, we occasionally serve customers who are in desperate need of direct financial help, and have been unable to identify help through existing funding routes. For these customers, we are seeking to set up a hardship fund, in partnership with existing similar funds. Access to this fund will have a strict set of criteria, to ensure that we are not duplicating any other available funding streams. This precaution goes straight to the heart of stakeholder feedback – we shouldn't be seen to be replacing social services or the NHS.

Background

As a responsible organisation we recognise that hardship can be multi-faceted in both cause and approaches to support. Creation and allocation of this hardship fund is similarly multi-faceted, similarly is a multi-faceted and looks to provide support at point of need by;

- Providing long term solutions to the causes of hardship
- Addressing circumstantially-related hardship
- Considering health Impacts and support required for those without means to cover urgent repair or replacement of appliances/pipework.

The £150,000/ year fund will be used to fund solutions delivered through community interest partners, and charities, who are close to both impacts of hardship and are aware and able to address the hardship caused. Funding will recognise energy related aspects of hardship all aspects that will be supported will be subject to meeting agreed criteria;

- 60 years old or over and have low household income and/or a disability
- Under 60 and have a low household income and/or a disability or
- Considered exceptionally vulnerable by the Home Improvement Agency(HIA)

Causes (25k)

Helping address causes of energy related hardship will be delivered considering longer terms and sustainable solutions that can be achieved by maximising income, often through lack of knowledge are ability to deal with administration / bureaucracy. Part of the fund will be used to partner with an organisation able to provide support via

- Benefits checks- assessments and support in application
- Warm Home discount- applications

This will ensure maximisation of income, often with back dated funding and providing an enduring long term method of support.

Expected outcomes based on previous engagement will be the unlocking of circa 200k of unclaimed benefits along with the relief to those on restricted income, for [250 homes/year]

Circumstance (£50K)

Recognising that some customers are in considerable hardship, but sometimes fail to meet minimum standards required for funding via National/Government support mechanisms, part of the fund will be used to put in place a mechanism similar to the ECO Flex Criteria, whereby fuel poor customers who fall short of requirements due to nuances of the schemes can be considered for support for cost of connection and installation measures to move them from fuel poverty, whilst in development aspects to consider as criteria are likely to be;

- Age related >60
- Impacted by cold related ill health
- In Fuel Poverty by greater than 10% of household income (as Scotland and wales)

- Unable to benefit as their local authority do not have a statement of intent in order to meet Flex Criteria aspects under ECO

We would anticipate based on assessment and average costs that we will be able to support around 10 Households/ year with costs of supply and installation measures.

Health impacted (£25k)

An accepted aspect of living in cold damp homes, is the increase in aspects associated with chronic obstructive pulmonary disease (COPD), which is more prevalent in the North East than elsewhere in the country, as such a partnership model will be established and maintained with a recognised charity to be able to provide direct support to those with COPD.

Support for cost of repair/replacement (50K)

Working in partnership with the Gas Safe charity, we will expand their network of support within the NGN footprint, by increasing funding to an additional 9 regionally based partner Home Improvement Agencies (HIA), where possible mapped against NGN data indicating areas of most need, given the needs of those in social housing is largely met by their landlords, the focus for this aspect of the fund will be “owner occupiers”, usually on zero hours contracts and minimum wage , previously considered “ Just about managing” as part of the gig economy. The fund will facilitate urgent repairs and safety related support that may otherwise be overlooked or disregarded in favour of acute needs. Work will be in the following areas;

- Gas Safety Checks
- Gas Servicing
- Gas Boiler Repairs
- Gas Boiler Replacements
- Gas Boiler Combustion Analysis
- Gas Cookers
- Gas Fires
- Gas Pipework
- Gas Meters
- Gas Water Heaters servicing, appliance repair and breakdown

In order to do this, we will

- proactively work with new and existing local delivery partners to expand gas safety support to vulnerable people in all districts within the NGN supply area
- Collaborate with other organisations to leverage more benefit from the home improvement agency network for the benefit of those experiencing hardship , including:
 - Promoting the installation of gas cooker valves for people with dementia
 - Supporting CO awareness by facilitating HIA involvement in CO awareness training session with Think CO
 - Distributing CO and cold alarms free of charge through HIAs in partnership with BlueWatch and NPower.
 - Sharing promotional information across the UK highlighting year-round gas safe awareness and sharing good practise of our HIA Partners in Gas Safe Programmes

We would expect to establish 9 new partnerships and support 125 homes/ year through this partnership.

Proposal to assess positive outcomes for fuel por connections customers

Vulnerable Customers Strategy Stakeholder Feedback Survey – 20 August 2019

1. Introduction – Context and Methodology

NGN has been keen to gain GD2 Business Plan input from partners involved in representing and supporting communities and vulnerable people, and in delivering positive projects in local communities or for disadvantaged groups. We describe these partners as ‘social stakeholders’ in this report, mostly third sector voluntary and community groups, as well as some wider partners.

NGN engaged social stakeholders through a workshop earlier in the stakeholder engagement process in February 2019 and this engaged with over 40 stakeholders in discussing key issues, options and potential priorities for the new GD2 Business Plan, and a report of the event has been produced and sent to participants³.

NGN is also updating the current ‘Vulnerable Customers Strategy’ (customers in vulnerable situations) that focuses on people and communities as part of, and in parallel to, its GD2 Business Plan, and which addresses physical and mental health, financial, rural and temporary vulnerabilities. Many of the social stakeholders’ organisations with the most direct, hands-on, interest in this strategy are small groups with limited resources. Given the large number of such groups, it has been difficult to meet directly during the stakeholder engagement process, and in addition, many of the smaller groups would find travelling to a workshop event outside of their local vicinity difficult – especially within the required timeframe. Hence, an alternative route to provide all these groups with the opportunity to feed into both the Vulnerable Customers Strategy and NGN’s GD2 Business Plan development was required. To do this, NGN has:

- a) Designed a short online survey on the key elements of the draft updated Vulnerable Customers Strategy to allow comments and opinion soundings on key points and sent this to 71 social stakeholders on its database of local and community groups
- b) Also invited a further 20 relevant social stakeholders who attended the previous event to complete this survey on the draft Vulnerable Customers Strategy
- c) Ensured both of the above groups have had email invites to complete the core Business Plan Acceptability survey, and to focus on social questions within it.

This report presents the results of the Vulnerable Customers Strategy survey element above.

The online survey was carried out between 28 July and 19 August, with a reminder email built into the process to boost returns. In total, 91 stakeholders were given the opportunity to participate and eleven responses were secured. All those who participated shared their organisational details, and responses were received from seven local level/community based organisations/projects, two national charities/campaign groups and two other

³ NGN/Impact, Social Workshop Report, August 2019

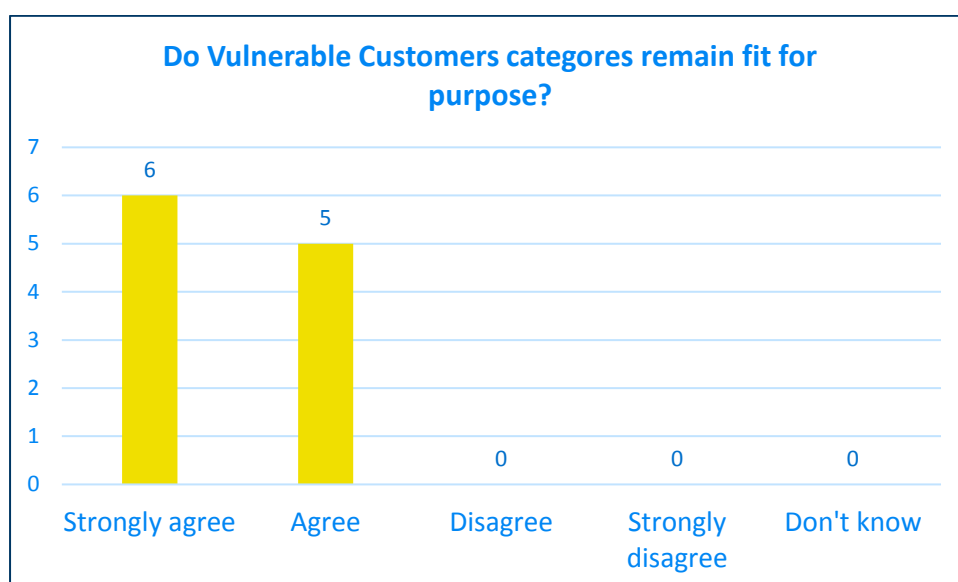
organisations. The activities/interest area of those responding included groups supporting blind and visually impaired people, people with dementia, people in poverty, people experiencing recent bereavement, safety campaigns, and groups focused on particular local or ethnic communities.

The responses from individual partners are not singled out within this report, although anonymised quotes from responses are used to highlight the points being made.

2. Focus of activity and categorisation of 'vulnerable customers'

Following stakeholder feedback in its current 'GD1' Business Plan period, NGN recognises multiple types of vulnerabilities, including Physical challenges; Mental wellbeing; Temporary vulnerability; Rural vulnerability and Financial hardship. In the survey, participants were asked how far they agree whether or not this typology remains fit for purpose?

Figure 1: Support for coverage and definition of types of vulnerability



All of the eleven organisations responding either agreed or strongly agreed with the continuation of the vulnerability categorisation as currently used and proposed in the draft Vulnerable Customers Strategy and GD2 Business Plan.

In addition, stakeholders were asked whether there were any changes they would suggest to this approach, and if so what? Four stakeholders suggested changes to the detail of the five vulnerability categories and their coverage and communication, although not to the headline categories themselves:

- Two organisations were keen that ethnic background and language barriers should be clearly covered
- One suggested bringing health problems associated with a cold home to the fore
- One would like to see 'specific consideration of the unique challenges of dementia'

The latter noted that:

“While I applaud the creation of dementia champions and dementia friends, this is a programme of awareness and is inadequate as training”.

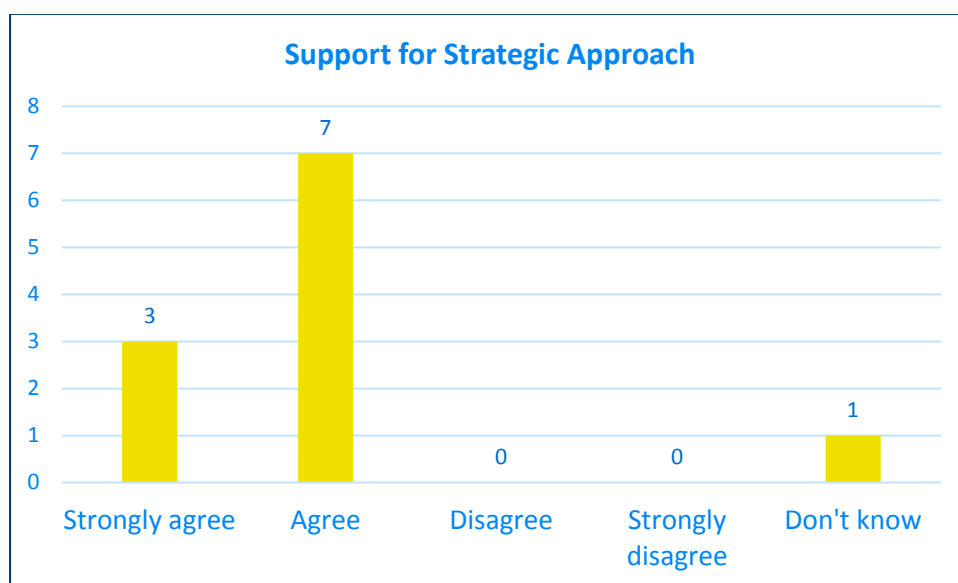
3. Strategic approach of the Vulnerable Customers Strategy

The draft Vulnerable Customers Strategy is based on:

- awareness of vulnerable customers and their needs
- accessibility to services and support for vulnerable customers, and
- action to protect, support and serve vulnerable customers.

Stakeholders were asked how far they agreed with this strategic approach and whether they would suggest any changes to it. Figure 2 shows the results.

Figure 2: Support for the Strategic Approach to Vulnerable Customers



There was strong support for the proposed approach - no organisations disagreed with what is proposed, while one did not express a view. However, most respondents 'agreed' rather than 'strongly agreed' with the approach, suggesting that some room for further improvement or refinement may exist. In relation to that, stakeholders were also invited to describe any changes they would suggest to the strategic approach, and these are listed in summary form below based on the six responses. Appendix 1 lists responses in full (apart from organisation specific details) to capture the depth and detail of the specific comments.

Potential improvements or refinements to the strategic approach – stakeholder comments

- Reaching vulnerable people - the approach is good but there are some potential problems as the most vulnerable people are the hardest to contact and may drop off the Priority Services Register (PSR) – making it important to do every check you can and offer any advice you can when you are able to contact them or gain access to the property.
- Take account of disabled customers - ensure the NGN website meets the Government's minimum standard (WKAG 2.1 Accessibility guidelines) and that there is an accessibility statement on literature (and/or transcription process in place) for those who need documents in accessible formats

- Need to train front line staff, call centre employees and meter readers, etc. regarding the needs of vulnerable and disabled customers
- Commit to training your staff on supporting people with dementia now that the initial awareness raising has been undertaken
- Local awareness in inner [city] areas and promotion is much needed
- We support NGN's strategic approach, but there could be a more joined up approach to identifying vulnerable customers and 'making every contact count', in terms of communication, raising awareness and support provided. Programmes could be scaled up and enhanced through joined up funding from NGN and other funding sources.

4. Vulnerable Customers Strategy commitments and outputs

The proposed Vulnerable Customers Strategy sets out a set of enhanced commitments/outputs for responding to the needs of vulnerable customers. These include actions and outputs such as:

- Ongoing commitment to training, including refresher training
- Commitment to introduce a competency framework related to vulnerability
- Development of a Charity Fund to better support those that need more help with appliances

The survey asked how far organisations support this set of commitments?

Figure 3: Support for the Set of Commitments to Vulnerable Customers



Nine of the eleven stakeholder organisations supported or strongly supported the set of commitments while two partially supported it. All were also asked whether there were any alternatives they would propose. The bullet points that follow summarise the responses from the seven organisations who made suggestions.

Potential Alternative and Additional Commitments/Support for Vulnerable Customers

- Direct subsidy of fuel bills for the most vulnerable clients
- Get key messages about the support available out to the hard to reach who are not already on PSR – including people you don't know about, who are not aware or not able to make themselves known (e.g. by using key community partners and health and care organisations)
- Partner with RNIB to access and achieve best practice advice around accessibility for disabled customers
- Training beyond awareness raising
- Keep local partners involved all year around as more and more people, especially vulnerable people, are moving into the inner areas of Leeds
- The best support for customers in vulnerable circumstances, especially during supply interruptions, emergency disconnections, major incidents, planned and unplanned works, would be an enhanced dedicated customer phone-line/one stop shop and access to specialist trained advisers, tailored energy advice, and a suite of support

5. Assisting consumers in vulnerable situations in the longer term

Social stakeholders were asked an open question about what more could be done to assist consumers in vulnerable situations in the longer term? Eight organisations offered suggestions in response as summarised below:

- Create a way of identifying vulnerable customers that doesn't rely on them self-referring by applying to be on a register
- Vulnerable customers need things made easy for them to report or find advice (e.g. an easy to remember phone number to notify NGN of any problems)
- Make some communication available in RNIB Easy Read format (suitable for customers who have difficulties reading or accessing information because of learning difficulties)
- Partner with external organisation for signposting for additional support once a need is suspected or identified
- Address language needs, especially in inner city areas
- Introduce a gas emergency appliance reconnection service to provide support to fuel poor and vulnerable households following a gas escape
- Utilise the Infrastructure North Alliance as a framework to enable a joined up approach across the gas and electric energy network and water sector in the region

6. Final Comments and Conclusions

In overview, we draw three headline conclusions from the partner input, these are:

- 4) There is very strong support for NGN's framework for identifying and addressing the needs of groups of vulnerable customers, including Physical challenges; Mental wellbeing; Temporary vulnerability; Rural vulnerability and Financial hardship.
- 5) There is good support for NGN's strategic approach and proposed support and commitments for vulnerable customers.
- 6) There are a range of suggestions for how the approach and commitments can be further strengthened and widened, and these include:
 - language needs, notably of BAME communities and in inner city areas
 - the needs of disabled people (e.g. for visually impaired and blind people)
 - identification of and communication with vulnerable people not on the PSR
 - Further consideration of the challenges of dementia
 - Further consideration of needs and problems associated with cold homes/fuel poverty
 - The importance of training beyond awareness raising
 - A joined-up approach that works with other partners in the community, business, public sector and health organisations and Infrastructure North partners