

Beyond good practice guides

Improving support with
essential services for people
with mental health problems



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Summary

In the past year we helped over 56,000 people with utilities and communications issues through our network of local Citizens Advice, and answered an additional 100,000 phone calls through our consumer service. And 41% of our clients have a disability or long term health condition, the most common of these being mental health problems. This means we are uniquely placed to understand the difficulties people with mental health problems face with essential services, and where providers fail to offer the support they need. We use this insight to inform our work as the statutory advocate for consumers.

Over the past few years, regulators have increased their focus on vulnerability. But at the same time, we have seen a 15% increase in consumer, utilities and telecoms issues for clients with mental health problems - compared to no change among our clients overall.¹ This suggests that current protections for vulnerable consumers are leaving people with mental health problems behind.

The Government's plans, laid out in the Consumer Green Paper, to have a Consumer Forum focus initially on mental health and consider the need for minimum standards for consumers with mental health problems, are welcome and timely. Our report shows the urgency of the detriment this group faces. Government and regulators now have an opportunity to significantly improve the quality of support on offer.

Broadly speaking, support with essential services can be financial, for example money off bills, safeguard tariffs or special treatment for vulnerable people in arrears. And it can be non-financial, such as providing information in different formats, help reading a meter or specialist customer service units for vulnerable customers. The exact forms of support providers are obliged to offer varies widely between the essential services of energy, water, telecoms and banking.²

Previous research has shown that people with mental health problems are likely to benefit from both financial and non-financial support.³ But overall, this research finds that in many areas, providers still do not offer effective protection and support for people with mental health problems.

¹ Citizens Advice, [Joining the Dots](#), 2017.

² See Appendix 1 for more details.

³ MMHPI, [Levelling the Playing Field](#), 2017.

- **Most clients are unaware they could get support with their essential services.** Despite providers' efforts, the vast majority of our advisers say that customer awareness of support is non-existent. Providers often tell people about support via letters or bills. But many clients with mental health problems are unable to open, read or understand these. And even the best promotional campaigns require people to take action - but for some clients, simply making a phone call to their provider is a challenge.
- **Even when people know support exists, they struggle to access it without help.** There is huge variation in how well customer service staff respond to requests for support, with rigid evidence requirements and complex processes making things even harder. Our research found telecoms staff particularly inflexible and unsympathetic to the impact of clients' mental health problems.
- **The support on offer is patchy, inconsistent and unreliable.** Support systems in the water sector are generally well designed and delivered. But overall, energy, telecoms and financial service providers do not provide effective support for people with mental health problems. This is particularly true in the telecoms sector, where the lack of consumer support or advocacy is causing high levels of detriment.

This means that in practice, many clients with mental health problems do not get the support they need. As a result, they are struggling to manage their essential services, which can cause stress, financial hardship and worsening health.

In their Consumer Green Paper, the government and regulators pledged to agree principles for improving services for consumers with mental health problems. In order to achieve this, the Government and UKRN should start by considering the following areas:

Recommendations

1. Through the UK Regulators Network and the proposed Consumer Forum, regulators should agree and introduce minimum standards of support for vulnerable consumers across all essential services
2. Providers should develop systematic, market-wide mechanisms for recording information about vulnerable customers' needs.
3. Providers should offer multiple ways for customers to get in touch in order to request extra support.
4. Evidence requirements for accessing support should be simple, consistent, and as low as is feasible.

Background

In recent years, essential service providers and regulators have focused increasingly on the importance of supporting vulnerable customers. There have also been a number of good practice guides, partnerships between third sector organisations and suppliers, and increased collaborative working.⁴ But at the same time, Citizens Advice have seen a 15% increase in consumer, utilities and telecoms issues for clients with mental health problems - compared to no change among our clients overall.⁵

Previous research has shown that people with mental health problems are particularly likely to struggle with their essential services.⁶ But beyond debt support, the needs of those with mental health problems have not historically been considered within traditional models of vulnerability. The increasing focus on this group, and subsequent understanding of the impact mental health problems can have, is a relatively recent development. So existing services have not been designed with their needs in mind.

Regulators and Government have made steps to address this gap. Ofgem recently amended their licence conditions to include a requirement for firms to identify and support vulnerable consumers.⁷ Ofcom will extend their accessibility requirements from October 2018, and will require all telecoms providers to identify and support vulnerable consumers.⁸ The Financial Conduct Authority (FCA) have identified both physical and mental health as potential drivers of vulnerability.⁹ And in their Consumer Green Paper, the Government announced the creation of a Consumer Forum focusing on vulnerability.¹⁰

Support can be financial (like money off bills or special treatment for people in arrears), or non-financial (like providing information in different formats, help reading a meter or access to a specialist customer service unit). But the support on offer varies widely.¹¹ And evidence from our service shows providers are not consistently meeting basic standards.

⁴ For examples, see Money Advice Trust and Energy UK, [Vulnerability, Mental Health and the Energy Sector](#), 2017 and UKRN, [Making better use of data](#), 2017.

⁵ Citizens Advice, [Joining the Dots](#), 2017.

⁶ MMHPI, [Levelling the Playing Field](#), 2017; Citizens Advice, [Joining the Dots](#), 2017.

⁷ Ofgem, [Final Decision: Standards of Conduct for suppliers in the retail energy market](#), 2017.

⁸ Ofcom, [Review of the General Conditions of Entitlement](#), General Conditions 10&12, 2017. General Condition 5 will require providers to have fair and effective policies to deal with vulnerable customers. This review also extends debt regulations to mobile providers.

⁹ FCA, [Our Future Approach to Consumers](#), 2017.

¹⁰ Department for Business, Energy and Industrial Strategy, [Modernising consumer markets](#), 2018.

¹¹ See Appendix 1 for more details.

We interviewed local Citizens Advice advisers to better understand how well services work for people with mental health problems and what could be improved. Since most existing schemes are targeted at those in debt or on a low income, many of our findings focus on these areas. The phrase ‘Financial Services’ generally applies to consumer credit and retail banking, since these are the financial services clients use most regularly. Advisers referenced the following support mechanisms most frequently:¹²

Scheme	Description
Priority Services Register (PSR)	Free service by energy suppliers and network operators to people who are of pensionable age, disabled, chronically sick/have a long-term medical condition, or are otherwise in a vulnerable situation. Support varies, but can include advance notice of planned power cuts, priority support in emergencies or meter reading. ¹³
Warm Home Discount	£140 off energy bills for people receiving Pension Credit Guarantee Credit. People who are on certain means-tested benefits may also be eligible, depending on their provider. Only energy providers with over 250,000 domestic or business customers must offer this. ¹⁴
Watersure	Caps water bills for those entitled to/receiving certain benefits, and are either responsible for children in full-time education, or have a medical condition that requires greater use of water. ¹⁵
Grants to clear arrears	Given at the discretion of energy and water providers to people who can't afford fuel debts. Some third party organisations give grants to specific groups, or to people in specific locations. ¹⁶
Debt and Mental Health Evidence Form (DMHEF)	Filled out by health and social care professionals. States a patient's mental health problem has impacted their ability to manage their money. The FCA notes the form and MALG Guidance accompanying it may be useful to creditors when defining procedures and policies for dealing with consumers with limited mental capacity. ¹⁷

¹² For more information about the support available in different markets, see Appendix 1.

¹³ Ofgem, [Priority Services Register for people in need](#), accessed 2018.

¹⁴ Ofgem, [Warm Home Discount](#), accessed 2018.

¹⁵ For more information regarding eligibility, see Citizens Advice, [Watersure scheme](#).

¹⁶ For more information, see Citizens Advice, [Grants and benefits to help you pay your energy bills](#) and [Help paying your water bill](#).

¹⁷ Money Advice Liaison Group, [Debt and Mental Health Evidence Form](#). Throughout this report, references to debt that are not in the context of a utility refer to general consumer debt.

Research method

Throughout this research, we deliberately avoided asking about specific mental health conditions, focusing instead on the impact of someone's mental health problem on their life. When interviewing advisers, we asked about 'clients with mental health problems'. In our quantitative research, we asked if respondents had experienced mental health problems that impacted their ability to manage everyday tasks. The findings of this research cover England and Wales.

Qualitative data

We carried out 31 telephone interviews with local Citizens Advice advisers from across England and Wales (27 advisers from England, 4 from Wales). Each interview lasted 30 minutes, and focused on the two essential markets where the adviser had the most experience. A further breakdown of the experience and specialisms of advisers we interviewed is located in Appendix 2. These interviews were conducted between 8th and 30th January.

To supplement these, we collected data on existing protections for people with mental health problems from the FCA, Ofgem, Ofcom and the Consumer Council for Water. We also gathered data from the Extra Help Unit (EHU),¹⁸ Ombudsman Services: Energy, Ombudsman Services: Communications, the Communications and Internet Services Adjudication Scheme (CISAS), and the Financial Ombudsman Service (FOS). Further details of their responses can be found in Appendix 3. This report was also informed by the findings of a longitudinal ethnography conducted by BritainThinks on behalf of Citizens Advice.¹⁹

Quantitative data

We supplemented our qualitative data with two online surveys. One was carried out by ComRes between 15th - 22nd March, and the other by YouGov between 22nd - 27th March. YouGov surveyed 4,257 adults, nationally representative of GB adults. ComRes surveyed 3,031 adults from across England and Wales. 1,530 respondents had mental health problems and 1,501 did not. A booster sample was applied to Wales in order to reach a minimum sub-sample size of 500. ComRes and YouGov are members of the British Polling Council and abide by its rules.

¹⁸ The [Extra Help Unit](#) is a specialist team of caseworkers investigating complaints in energy and post on behalf of vulnerable consumers.

¹⁹ Britainthinks on behalf of Citizens Advice, [Essential service markets and people with mental health problems](#), 2018.

1. Why don't people know support exists?

Most customers with mental health problems²⁰ are unaware that they could get support with paying for or managing their essential services.²¹ In fact, despite providers' efforts, the vast majority of advisers we interviewed find that customer awareness is non-existent. This prevents many people from ever investigating services they might be eligible for.

"A shocking number of clients [with mental health problems] are not aware that they could be on the Priority Services Register."²²

- Jane, adviser, London

One reason for this is that advertising and awareness-raising efforts are rarely tailored to the needs of people with mental health problems. For example, providers often tell people about support via letters or bills. But many clients with mental health problems are unable to open, read or understand these. And even the best promotional campaigns require people to take action - but for some clients, simply making a phone call to their provider is a challenge.

Another problem is that people often have to disclose their mental health problem before support is offered to them. But our research finds that people with mental health problems are much less likely to trust providers to treat them fairly, compared to those without. And they are unlikely to disclose their mental health problem unless they know they can access support as a result. So in order to be successful, providers' advertising techniques need to be far more targeted and proactive.

Typical communication methods don't work

Providers often let customers know about the support they offer in letters or bills. But many customers with mental health problems struggle to engage with these 'typical' forms of advertising.

²⁰ To understand how we have defined 'mental health problems' for the purposes of this research, please see the Research Method.

²¹ For example, through the Priority Services Register in energy, Priority Fault Repair for landlines, affordability schemes like the Warm Home Discount and the need for companies to take mental capacity into account when negotiating debt repayment plans.

²² For more information about the support available in different markets, see Appendix 1.

Advisers said that their clients can struggle to open letters if they are worried about what's inside. If a customer has anxiety or depression, a letter can exacerbate their mental health problem rather than provide a solution. Similarly, people with mental health problems can struggle to pick up the phone to a customer service team, if they are anxious about speaking to people who they don't already know.

“Things like envelopes coming through the door can be very daunting. They can make people anxious. So they tend to sort of stick with what they've got rather than go out there and see if there's a better deal for them.”

- Annie, benefits adviser, Wales

An ethnographic study conducted on behalf of Citizens Advice found that there was no single method of communication preferred by all participants.²³ Previous research conducted by Citizens Advice found that when people are experiencing a period of poor mental health:²⁴



Allowing customers to have greater choice over communication methods could increase the chances of them finding out about a support scheme. Some advisers said their clients found information included in text messages easier to process than in letters or bills. And some suggested that more opportunities for face-to-face contact in shops or community spaces like libraries could provide support for those who struggle to manage their account online or over the phone.

²³ An ethnographic study carried out on behalf of Citizens Advice.

²⁴ Survey conducted by Comres on behalf of Citizens Advice, March 2017. Base: 1000.

Advertising practices are generally poor

Providers often adopt a 'one size fits all' approach to the awareness-raising methods which they use. This means they often don't tailor the content or delivery of their communications to people who are eligible to claim it.

Frequently, communications are either too long or too dense to understand, with information about support schemes buried in bills or standard correspondence. The language that they use can also be overly technical and incomprehensible to someone with relatively low literacy levels or cognitive impairments.

"You get a brochure about 15 or 20 pages long, and what do you do most of the time, you don't read it. It's bound to happen, when people send out the letters. They don't read it."

- Colin, adviser, South West England

"Websites vary, leaflets are few and far between these days. Terminology is very different and you need to know the buzz word. Each one has their own buzz word."

- Esther, adviser, South West England

Ofgem's own qualitative research found that the 'Where to get help' section in providers' literature was not noticed by a typical energy consumer, let alone someone with a mental health problem.²⁵ Participants in their consumer panel also found the 'design and density [of the literature]... difficult to navigate' and expressed cynicism about providers' willingness to help. And previous research by Citizens Advice found that typical consumers find it difficult to navigate the information provided by essential service suppliers.²⁶

An example of this can be found in the telecoms sector. An audit of providers' websites reveals the difficulties that a customer with mental health problems may face, when trying to search for support on their providers' website. The following table shows the minimum number of clicks a consumer would have to make from each website's homepage to find information about Priority Fault Repair.²⁷ It also shows the title a consumer would have to click on at each stage of their journey.

²⁵ Ofgem, [Consumer First Panel: understanding consumer needs](#), 2017.

²⁶ Citizens Advice, [The Cost of Loyalty](#), 2018.

²⁷ People with a long term mental health problem that means they are unable to leave the house unaided are likely to be eligible for this service. For more information, see Appendix 1.

Provider	Number of clicks	Journey
BT	5	Help and Support Landline Getting Set Up Help for people with impairments or particular needs I rely on my telephone and need it repaired urgently
Talk Talk	4	Help Phone Troubleshooting Priority Fault Repair
Plusnet	5	Help Legal Accessibility Support for Customers with Disabilities Hearing
Virgin Media	3	Scroll down to the footer Accessibility More about Virgin Phone Telephone Fault Priority
Sky	5	Scroll down to the footer Accessibility Cognitive impairment Read about our support for Sky Talk and Sky Mobile Talk & Broadband Our Sky Talk service for you

To find out information about Priority Fault Repair on Plusnet’s website, for example, a customer has to make 5 clicks to get to the relevant page. Each click opens a new web page containing a new set of information, and the journey is not always intuitive. For example, few people would go to a page entitled ‘Getting set up’ to find out about extra support they can access in an emergency.

Many energy companies require a similarly high level of customer engagement. One energy company requires consumers to make 5 clicks to see information relating to the Priority Services register. For another, researchers had to search specifically for the term ‘Priority Services Register’ in order to find the page. It’s

likely this is why one adviser said that it sometimes feels as if the Priority Services Register operates on a 'need to know basis'.²⁸

"I don't think it's advertised very obviously by the companies themselves. Perhaps they think if they advertised it too prominently, too many people would claim [...] In terms of clients knowing that they can get help from the companies, I don't think they want to advertise it too much."

- Mohamed, adviser, South West England

Several advisers did point to the existence of good awareness-raising schemes. One said that energy providers often ask whether a new client is aware of the Priority Services Register. And another said that several ask clients about their mental and physical health when they switch. But in most cases, access depends on a consumer already knowing about the support service in question.

Communications rely on consumers being proactive

Much of providers' promotional material assumes that vulnerable consumers will be proactive in seeking support. For example, letters will often provide a phone number that customers can ring to access support or details of where to find information on their website. But according to our advisers, clients with mental health problems often don't have access to a working telephone or internet.

Beyond this, some actions that a 'typical' customer might reasonably be expected to take are impossible barriers for those with mental health problems. Letters and bills, for example, can sometimes include a form that customers can fill out to be put on a register. But if someone is struggling with day-to-day life, then it's more difficult for them to take the initiative in this way. And if they have anxiety associated with speaking on the phone, they are unlikely to ring up a special assistance unit on their own.

"There's an awful lot of information they ask for...very often people that need to access these bits of help are already not well, or not as able to sort themselves out to get these things in order and have evidence to show, or post off or put online"

²⁸ The sample size for our adviser interviews has meant that it is not possible to offer substantiated conclusions about smaller energy companies. Accordingly, we have focused on the 'Big Six' in this report.

- Olivia, adviser, South West England

Since these specific difficulties are rarely taken into account, providers' efforts to support customers can sometimes fall at the first hurdle.

People with mental health problems often don't trust their providers

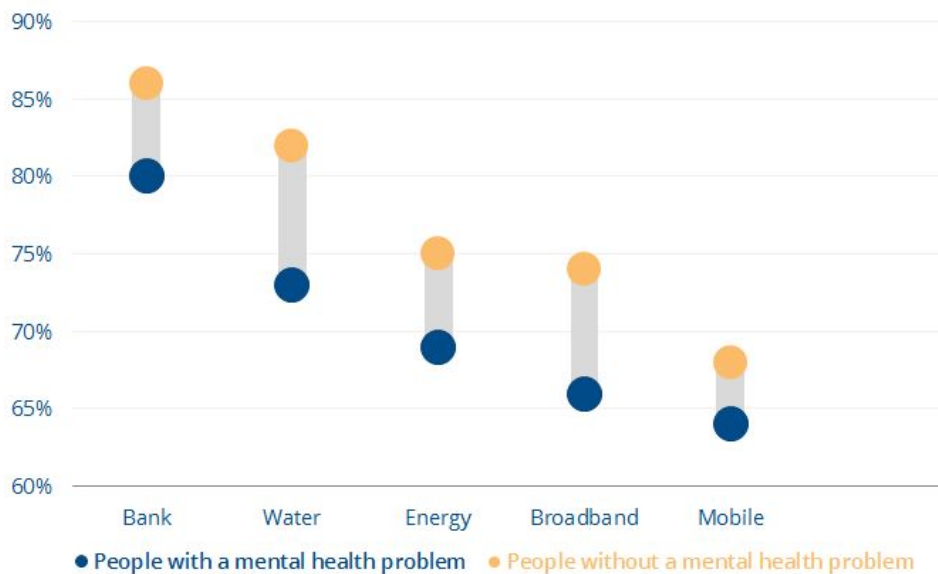
Our advisers recognised the difficulties that companies face when it comes to raising awareness about their support schemes. Customers with mental health problems are often very isolated and don't necessarily use local services in the same way as other customers. And several advisers believed that, for customers with severe mental health problems, face-to-face support might always be needed.

"A person with mental health problems just wouldn't contact people on their own. Sometimes that's part of their illness. They won't open their mail because it creates so much of an anxiety, so they'll just leave it. And they can only deal with those problems if there's someone with them."

- Dan, adviser, North West England

In keeping with this, our research found that people with mental health problems are consistently less likely to trust their essential service provider to treat them fairly, compared to those without mental health problems.

Chart 1: % of people who trust their provider to treat them fairly



Source: Survey conducted by Comres on behalf of Citizens Advice. Base: 3,031.

Further analysis carried out by Citizens Advice found that among consumers with mental health problems who had high levels of trust in their essential service providers, 84% thought providers were likely to offer extra support to one or more vulnerable groups.²⁹ But among consumers who had mental health problems and low levels of trust, only 68% thought this was likely.³⁰ So lower trust means lower expectations that support will be available.

Advisers said that many clients find relationships with providers stressful and antagonistic from the start. Long and costly waiting times on phone lines can create barriers between customers and their provider. As one adviser said, for a client with a mental health problem, being constantly 'on hold' can reinforce a sense that nobody wants to talk to them. This adds to the perception of utility companies as 'scary' and intimidating.

"The letters that they send out are usually very cold, clinical letters. 'Do this now or else'."

- Miriam, benefits specialist, North West England

"It's that constant 'nobody wants to speak to me'. And if you're getting that constantly reinforced then it does push back that engagement level."

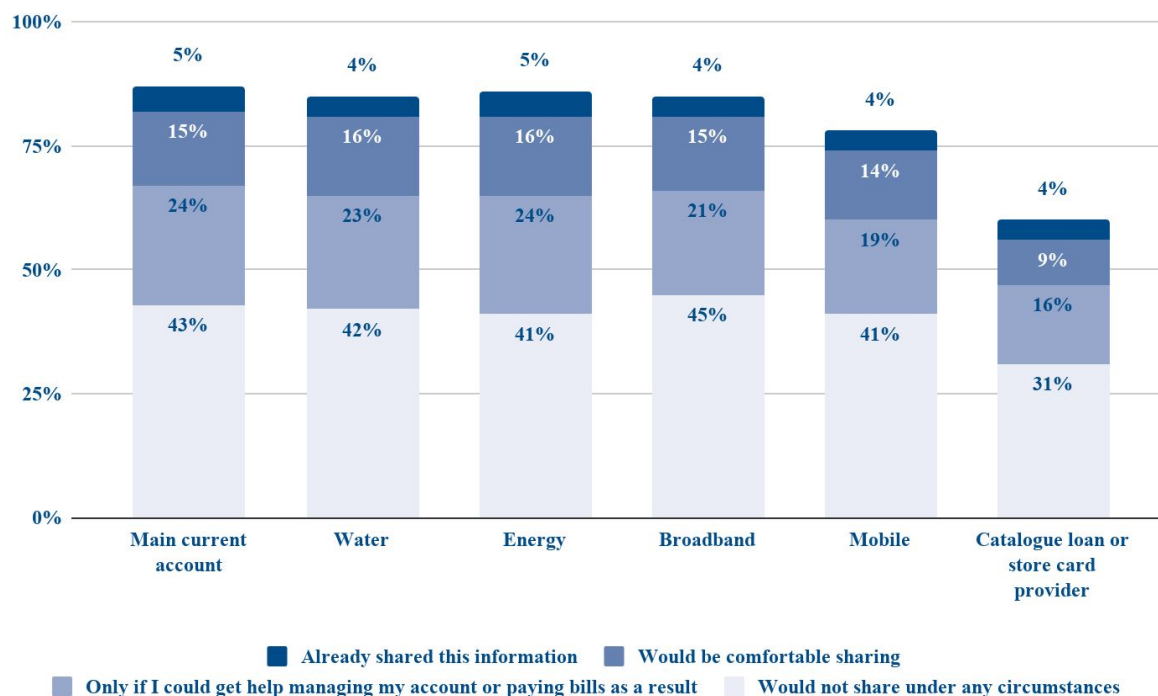
- Joan, employment adviser, North East England

Many people with mental health problems find it particularly hard to divulge personal information. One adviser mentioned clients are sometimes unwilling to do so because they are embarrassed or scared to 'admit' they have a mental health problem. On the other hand, our ethnographic research finds that a significant number of people would be willing to share information about their health condition if it meant they could get extra help as a result. National polling also shows a split between consumers who are willing to disclose their mental health problem and those who are not.

²⁹ For all survey analysis in this report, the term 'mental health problems' is used to refer to those who have experienced a mental health problem that had an impact on their ability to carry out daily activities. 'Those without mental health problems' refers to people who have either not experienced any mental health problems, or whose mental health problems have not impacted their ability to carry out daily activities.

³⁰ For the purposes of this analysis, 'high trust' was defined as respondents who trusted more than half of their essential service providers 'a great deal' or 'to some extent'. 'Low trust' was defined as those who trusted fewer than half of their providers 'a great deal' or 'to some extent'. We looked at responses from all respondents who said their mental health problem impacted their ability to carry out daily activities 'a lot' or 'a little', since these are the people most likely to need, and be eligible for, extra support. Base: 172 'low trust', 944 'high trust'.

Chart 2: How comfortable would you feel telling providers about your mental health problem?



Source: Survey conducted by Comres on behalf of Citizens Advice. Base: 1530.³¹

If customers with mental health problems don't trust their providers, they are less likely to expect essential service providers to offer support for vulnerable customers. And they are less likely to tell their providers about their mental health problems as a result. On the other hand, advisers said that good relationships between clients and providers can help to increase awareness of support. One adviser said that when a provider 'goes the extra mile', clients feel more valued and are more comfortable asking for support.

³¹ The remaining responses to this survey question for each sector are accounted for by people who said 'Don't know'.

2. Is support easy to access?

This research finds that even those who know support is available struggle to access it without help.

Often providers limit how tasks can be carried out, so that a customer can only access support over the phone, or online, for example. For many people with mental health problems, this restriction can create an insurmountable barrier. These restrictions also highlight the crucial importance of access to telecoms services for all vulnerable groups.

Our research found large inconsistencies in the quality of support provided by customer service staff. Advisers report waiting on hold for long periods of time, struggling to navigate telephone systems, and finding customer service staff inflexible, unsympathetic or unaware of the support their company offers. Many described the process of navigating frontline customer service as a 'lottery'.

Finally, our research finds that simply having a mental health problem does not always qualify people for extra support with essential services. And where they are eligible, people with mental health problems are likely to struggle to produce the necessary evidence. This was particularly highlighted with regards to means-tested social tariffs and negotiations with creditors.

Communication options are too limited

To make services accessible to all, it's important that people are able to choose which medium of communication works best for them. But when it comes to specific tasks, consumers are often limited in their options. These limitations can disadvantage people who struggle with certain forms of communication - regardless of whether they are trying to access support. For example, while it's possible to terminate a mobile handset contract and take out a new one online, consumers still need to call up their old provider if they want to keep the same number.³²

³² From July 2019, this will change to an 'auto-switch' process which will allow consumers to request a PAC code online or via text. However, this will not be possible for some multi-sim contracts. Ofcom, [*Consumer Switching: Decision on reforming the switching of mobile communication services*](#) (2018)

When it comes to accessing extra support, similar barriers exist. For example, the processes for accessing energy suppliers' priority services register are inconsistent, and often limited:³³

Provider ³⁴	Specified service	Advertised access options
British Gas	Accessing all priority services	Telephone, textphone
Npower	Accessing all priority services	Online, telephone, webchat
Scottish Power	Accessing all priority services	Paper form, telephone
SSE	Accessing all priority services	BSL SignVideo, email, paper form, telephone, text
E.ON	Authorising someone else to handle your account	Letter, telephone
	All other support services	Email, letter, minicom, telephone
EDF Energy	Accessing all priority services	Minicom, online, paper form, telephone
First Utility	Accessing all priority services	Email, online, paper form, telephone
Ovo	Accessing all priority services	Online, paper form, telephone
Utilita	Accessing all priority services	Email, online, telephone

Allowing people to sign up for these services from the Citizens Advice website or that of other charities could help encourage more vulnerable people to do so.³⁵

Similar barriers exist in other sectors. For example, it is mandatory for all telecoms providers to offer third party bill management to all customers. But on providers' websites, it is often unclear how to go about setting this up. One of the largest mobile service providers does not include any information regarding how to set up third party bill management. Two more say that customers should get in contact for more information - but this is not followed with contact details or a list of communication options.

³³ See the Background section for a definition of the PSR.

³⁴ The findings from our interviews with advisers apply primarily to the Big Six energy companies, since few advisers we interviewed had encountered smaller suppliers. However we have included other energy suppliers in this table to enable effective cross-provider comparisons.

³⁵ Citizens Advice, [9 million people are missing out on support with their energy supplier](#), 2018.

Beyond the problems caused by poor advertising, there are also practicalities to overcome. Advisers praised the quality of support some clients received at physical bank branches. But it's not always possible for people to access these due to closures and limited opening times. Physical locations for help with an energy provider are rare. And in telecoms, the sales-focused setup of shops can cause anxiety and confusion for those with mental health problems. These practical limitations can have a disproportionate impact on the ability of those with mental health problems to access extra support.

This also means access to telecoms services is vital for clients. Calling customer helplines requires a working phone service. Filling out an online form requires internet access. But both services can be disconnected if someone is in debt, or has a disputed bill. This, in turn, can make other essential services unmanageable. Our research into the lived experience of people with mental health problems supports this.³⁶

Customer service is inadequate

While advisers reported very consistent customer service training and support from water providers, they described huge variation in how staff in other sectors respond to queries about support. Many described the process as a 'lottery', where success or failure depends more on the knowledge and empathy of the individual than on a company's official policy. This is supported by evidence from the Ombudsman Services: Energy:

"Some suppliers showed a little more empathy when the customer has an illness and will treat the situation more delicately. Others did not show any empathy and clearly state they cannot comment on health issues and these are the customer's own opinion.

We also found that there was no consistency within a supplier itself and it was probably the actions of individual advisors that leant itself to this, some showing more empathy than others."

A representative of the Extra Help Unit said that energy suppliers seem to have particularly poor understanding of the difficulties caused by mental health problems.

³⁶ Britainthinks on behalf of Citizens Advice, [Essential service markets and people with mental health problems](#), 2018.

“Consumers with mental health conditions are often not identified, instead being perceived to be difficult or unreasonable, and therefore the fact they have mental health concerns is not properly identified or understood...”

“Even when a consumer has informed the supplier of the fact that they have mental health concerns, there seems to be poor awareness and understanding of how the condition affects consumers and how they need to be supported.”

Evidence from the Extra Help Unit also suggests that knowledge of existing support systems is low among frontline customer service staff, with smaller energy suppliers being particularly poor in this respect. This echoes the experiences of our local advisers. One adviser had been told that there are no support services in energy. Another was told that the company in question was not obliged to supply any kind of extra support. A third said that on multiple occasions customer service staff didn’t know what the Priority Services Register or Warm Home Discount were.

“to be perfectly honest, even though I’m aware of it...I’ve spent hours...having very, very strong conversations with call centres and people from services, they will deny that these things exist”

- Shereen, adviser, North West England

In financial services, there are fewer formal support mechanisms. One informal protection is the Debt and Mental Health Evidence Form (DMHEF).³⁷ If a client produces this form, creditors may respond by writing off some of their debt, creating a more flexible repayment schedule, or not referring their case to a debt collector.³⁸ Most advisers said this form is an effective tool for helping clients.

However, this research also found pockets of unacceptably sharp practice in this area. Two advisers said that they regularly invoke the FCA’s guidelines on debt collection practices in order to ensure creditors accept the DMHEF. It’s unreasonable to expect this level of knowledge and assertiveness from consumers who have already identified themselves to a provider as potentially

³⁷ Throughout this report, references to ‘financial services’ generally apply specifically to the consumer credit and retail banking sectors. These are the areas where most problems mentioned by advisers occurred.

³⁸ Throughout this report, where we have discussed ‘debt’ without making reference to a particular essential service or utility, it should be assumed that the debt in question is not a utility debt. Utility debt are subject to different regulations, and have been discussed in the context of the specific service in question.

vulnerable. Most Citizens Advice clients would not be able to challenge a creditor in this way - making it harder for them to get fair treatment.

Advisers also reported instances where creditors claim not to have received letters, insist on seeing a client in person and refuse to accept photocopied consent forms.

“a remarkably large number of letters to creditors seem to disappear compared to the national average of lost post....you try again and usually they accept their responsibilities, we use the complaints procedure of the FCA fairly regularly and that usually forces them.”

- Colin, adviser, South West England

Telecoms lags behind other sectors

“I haven't had a great deal of success in getting a lot of support within the telecoms industry”

- Joan, employment adviser, North East England

“With the telecoms it was very, very difficult. And even me being involved, pinning them down, getting it to the stage where it was a complaint, where you get a case manager, and fixing an appointment so we all meet up as a triage over the phone to get the next stage of the problem sorted, or even looked into, was difficult. They weren't adhering to their promises”

- Olivia, adviser, South West England

Advisers reported less variation across telecoms providers, but largely because they considered it to be ‘the worst’ sector in terms of the quality of customer service and responsiveness to a client’s mental health problems. This reflects the findings from previous work examining debt collection practices in consumer markets.³⁹ Our research also finds that problems with telecoms can have a disproportionate impact on this group - so it is particularly worrying that practice is considered to be so poor.

A number of advisers said clients with mental health problems were at risk of taking out unsuitable telecoms contracts during periods of poor mental health. For these clients, it’s vital that telecoms providers have effective processes for redress and problem resolution.

³⁹ Citizens Advice, [Falling Behind](#), January 2016.

But our advisers reported considerable difficulty in proving to mobile handset providers that a contract has been mis-sold, especially if the sale took place in person and there is no record of the sales process. They said providers dismiss the impact of mental health problems on their customers, and show very little flexibility when informed of someone's mental health condition.



Maria recently helped a client who took out an unaffordable mobile phone contract online while an inpatient in a mental health ward. Maria contacted the provider to cancel this contract, since her client did not have the mental capacity to make the purchase. However, the provider refused to terminate the contract on these grounds.

The provider said they couldn't have known this information when the contract was first taken out, and so were not obliged to cancel it. Despite Maria showing that her client had used the hospital's address when registering for her contract, the provider still refused to negotiate or terminate the contract.

"they still claim that 'how were they supposed to know that that person might not have capacity?'"

It's easier with support from an adviser

When it comes to resolving issues, advisers said that support from a third party makes processes quicker and easier for all involved. There are a number of reasons for this:

- Providers are more willing to negotiate with a third party
- Advisers have specialist knowledge and expertise
- Many local Citizens Advice have direct lines to specialist support units.

"I feel for clients who haven't got our support and have to do it themselves. Very often they'll only come to us as a last resort, when they've made efforts to engage with a supplier or try to explain their personal circumstances or their mental health problems, and they've been met with short shrift"

- Alun, utilities adviser, South Wales

When it comes to negotiating debts and arranging repayment plans, a number of advisers said creditors are generally more flexible and less reliant on extensive negotiation and proof when an adviser is involved. Some advisers

suggested this is because third party support benefits creditors as well as clients. Impartial support reduces feelings of stress and makes the process easier for clients to navigate. This in turn makes it more likely that debts will be paid.

When negotiation with a provider does not go smoothly, advisers can challenge unfair or unreasonable behaviour, since they have a stronger understanding of industry standards and best practice. Advisers said this specialist knowledge is crucial, prompting providers who might otherwise not comply with their responsibilities to do so.

And finally, a number of advisers interviewed said their local office had direct lines to specialist 'vulnerable customer' units within energy and financial service providers, allowing them to bypass the 'usual channels'. Advisers generally praised the quality of support offered by these units, and said having a direct line to them helps enormously.

"Once you've got through the telephone system and got to the right department it's normally quite straightforward, but... it's difficult to get through to people on the phone nowadays, especially with the utilities companies, you can be on hold for quite some time."

- Janine, adviser, South Wales

On the other hand, specialist units are not always available. And even for advisers, without a direct line, or an existing relationship with a sympathetic staff member, it's difficult to access appropriate support.

Evidence requirements are too rigid and onerous

Our research finds that poorly designed systems, rigid application processes and restrictive eligibility criteria can also shut people out. This primarily applies to instances where people are accessing financial support, or where there is a significant cost attached to providing a service.

Having a mental health condition rarely qualifies people for financial support with their essential services, unless they are also on a low income. Our ethnographic research shows that sometimes this leaves people without much-needed support.⁴⁰ And where people with mental health problems are eligible for support, advisers say they often struggle to apply.

⁴⁰Britainthinks on behalf of Citizens Advice, [Essential service markets and people with mental health problems](#), 2018.

“There’s an awful lot of information they ask for... very often people that need to access these bits of help are already not well or not as able to sort themselves out to get these things in order”

- Olivia, adviser, South West England

Advisers told us that clients with mental health problems often struggle to complete applications for accessing support due to difficulties completing paperwork correctly and meeting deadlines. If applications are incorrectly completed, they will be closed, and the process must be restarted.

“If they send an application form to a client and say ‘if you complete this and send it back to us, we will offer you this’... if the client doesn’t send it back, they’re not going to chase it... that client most likely hasn’t got the time or the ability to understand it.”

- Mohamed, adviser, South West England

Advisers also reported large variation in the level of evidence required to access similar services in different markets. One common requirement for accessing financial support in energy and water, and for negotiating debt repayment plans with creditors, is providing proof of income and expenditure. This is arguably necessary for a debt repayment plan. But advisers mentioned that water companies often show flexibility when it comes to proof of income.

“The energy companies often want proof of all income, whereas [the regional water provider] will generally accept if we say we’ve seen evidence... it would be great if the electricity companies could accept at some level accept our view on whether a client was going to cope”

- Jane, adviser, London

Another common requirement is for clients to produce proof of benefits receipt or GP diagnosis. For the former, providers often require a recent award letter, which clients are unlikely to have to hand. This could be because they struggle to keep track of paperwork, or because their letter isn’t recent enough. Similarly, very few people have a signed letter from their GP stating their diagnosis to hand. In these cases, clients need to request a new award letter, or contact their GP. Both of these can take some time. In the meantime, their application will be delayed - and some people may give up altogether.

Our research finds that people with mental health problems are significantly more likely to find it difficult to produce the evidence required for accessing services. Of those with mental health problems:

- 33% would find it difficult to send an essential service provider a letter showing proof of benefit receipt, compared to 15% of those without
- 39% would find it difficult to contact their GP to ask for evidence of a health problem, compared to 22% of those without
- 33% would find it difficult to send an essential service provider proof of income or expenditure, compared to 16% of those without

There will always be some services where a high threshold of evidence is required. But wherever it is feasible, application processes should be simplified. And providers should consider whether there is scope for more flexibility when it comes to the forms of evidence that are acceptable. For example, the word of a third party advocate or social worker could be considered adequate proof of someone's mental and financial ability to cope.

Beyond this, while people with mental health problems may be eligible for extra support services due to another reason, their mental health will not necessarily qualify them for it. With the exception of Watersure, most existing schemes require people to either be receiving certain benefits, be on a low income or over a certain age.⁴¹ This risks excluding people with mental health problems from services that could provide much-needed support.⁴²

⁴¹This scheme caps the water bills of customers who are entitled to, or receiving, certain benefits and are either responsible for children in full-time education or who have a medical condition that requires greater use of water. Their bills are capped so that they pay no more than the average household.

⁴² This is supported by our ethnographic research, conducted by BritainThinks on behalf of Citizens Advice, [Essential service markets and people with mental health problems](#), 2018.

3. Are people's needs being met?

To understand how well support services work once people access them, we supplemented our adviser interviews with desk research and polling data.

Our findings show that support for people with mental health problems in essential services is often patchy, inconsistent and unreliable. Where support does exist, it is primarily designed to kick in at crisis point - for example, when a person is in debt or needs an emergency repair. There are few services that help clients who struggle to pay their bills, before they become indebted. There is even less to help them manage day-to-day tasks like communicating with providers, resolving minor problems and keeping track of bills.

And compared to other essential services, the telecoms sector has significantly fewer protections to support people with mental health problems. This is particularly true in cases where issues reach crisis point. Our evidence shows that this is leading to high levels of detriment.

Most sectors have good systems for dealing with debt

In general, advisers said most sectors have effective systems in place for supporting people in debt, and most providers acknowledge the role that mental health problems play in this. This was particularly evident in the water sector, where providers' practices were frequently praised.

Advisers pointed to the wide availability of grants and trusts to clear water debts, the ease of applying for Watersure on a client's behalf and the accessibility of customer helplines. In comparison to energy providers, advisers report much quicker processing times for social tariff and grant applications. One adviser said that while hearing back from a grant application from an energy provider usually takes around 2 months, the equivalent process in water takes around 2 weeks. This is partly due to a more flexible approach to evidence.

'The energy companies often want proof of all income, whereas Thames Water will generally accept if we say we've seen evidence.'

- Jane, adviser, London

Similar good practice was seen in financial services. Advisers highlighted the usefulness of the Debt and Mental Health Evidence form in compelling creditors to take a client's mental health into account. And many advisers praised the service delivered by specialist units within the six largest banks.

But telecoms providers are far behind

This research finds that the telecoms sector is far behind other essential markets when it comes to preventing, addressing and recovering debts from people with mental health problems.⁴³ In particular, advisers reported that the focus placed on sales, and the resulting issue of contracts being mis-sold, causes a number of issues for clients with mental health problems.

Advisers reported a lack of understanding from providers on the impact of mental health problems on customers' ability to make informed decisions. And they reported great difficulty in negotiating repayment plans, extra support or special circumstances for clients due to their mental health problems. A number of advisers said that telecoms providers tend to be more inflexible in their approach, compared to other essential service providers.

"[telecoms providers are] a lot more hard work...they don't listen to what you're saying. They have set letters and speeches and you have to fit in one of them: 'the client signed the contract, so they must be liable'"

- Angela, debt adviser, South East England

This is reflected in comments from Ombudsman Services: Communications:

"We do have concerns about how people with mental health problems are treated when they are in debt. Some providers do not allow customers to set up payment plans when they fall into debt, and instead refer them to debt collection agencies. This can be an upsetting experience. In addition, most providers will suspend the services of customers who fall into debt and will not remove the suspension until the debt has been paid off in full – even if the customer needs to stay in touch with others because of health problems."

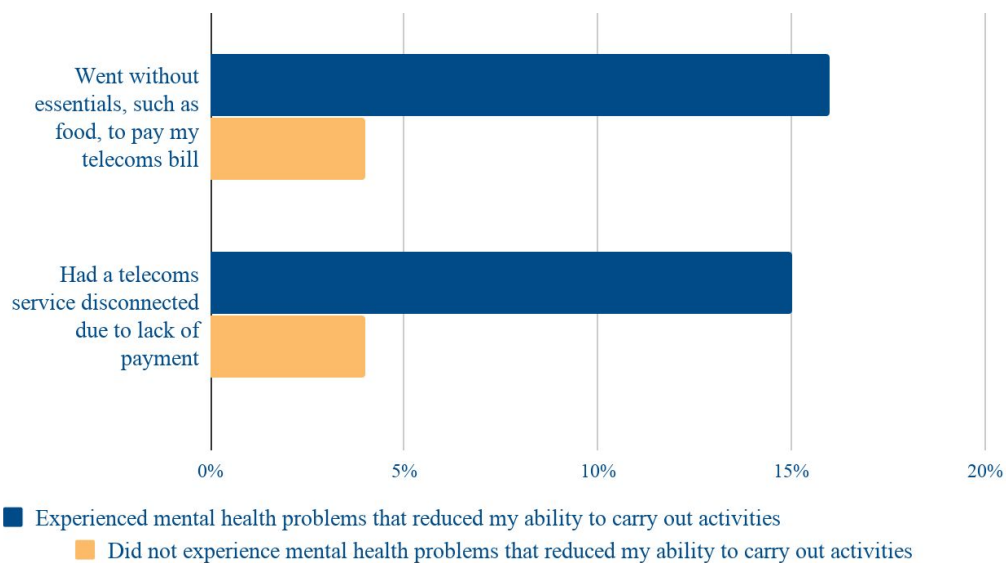
In October 2018, regulations regarding debt collection in fixed voice services will be extended to mobile and broadband. Providers will be required to ensure that

⁴³ This is supported by previous Citizens Advice research, which found that debt collection practices in the mobile phone market are far behind other sectors. Citizens Advice, [Falling Behind](#), 2016.

their debt collection practices are 'proportionate and not unduly discriminatory'. However, the regulation does not set out what action providers should take to ensure they meet this requirement and Ofcom have not committed to issuing any further guidance.

Recent research by Citizens Advice found that those who experienced a mental health problem that significantly reduced their ability to carry out daily activities were more likely to struggle paying their broadband, mobile or landline bill:⁴⁴

Chart 3: % of respondents who have experienced the following in the past 3 years



Source: Survey conducted by Yougov on behalf of Citizens Advice. Base: 4257.

Telecoms consumers with mental health problems who had been disconnected due to lack of payment were more than twice as likely to say they had experienced a negative impact on their wellbeing as a result (21% compared to 9% of those without mental health problems).⁴⁵ This echoes the findings of both our ethnographic study and our interviews with advisers. A number of participants in both studies mentioned the very high negative impact associated with telecoms services being disconnected.

⁴⁴ People who self-disconnect from their prepayment meter are more likely to have a long term health condition, compared to people who have not self-disconnected. Citizens Advice, [Switched on](#), 2018.

⁴⁵ Base: 394 people who said they had experienced mental health problems that affected their ability to carry out daily activities 'a little' or 'a lot'. 376 people who had either experienced no mental health problems, or whose mental health problems did not impact their ability to carry out daily activities at all.

It's likely this is partly due to the knock-on effects that disconnection from mobile or internet services can have. According to the Extra Help Unit, the smart meter rollout in energy and the changing supplier landscape has led to people increasingly needing to be online. And evidence from our service shows just how wide-ranging the consequences of disconnection can be.

Case study: Denise

Denise recently left an emotionally and financially abusive relationship. She is currently receiving Universal Credit and has long term mental health problems. Her mobile phone is her only form of internet access.

Denise accidentally called a charged-for number, and incurred a mobile phone debt of £44. She couldn't afford to pay this bill, and was very worried that her service would be disconnected as a result. This would mean she could not manage her Universal Credit claim, or contact her daughter. She came to Citizens Advice for help resolving the issue.

Even the threat of disconnection causes clients anxiety, and can lead to them prioritising telecoms debts over other debts that may be more costly or have higher consequences for non-payment.⁴⁶ Respondents to our survey who had experienced mental health problems were more likely to say that paying their mobile phone bill, or topping up a prepaid phone, would be one of their top three priorities if they were struggling to pay their bill. 52% of those with mental health problems said they would prioritise this payment, compared 41% of those without.

Day-to-day support is not widely available

'[Energy providers are] very good at giving grants to clear arrears...they're not good at flagging that people could get better tariffs'

- Jane, adviser, London

While it's important that services work well at crisis point, more needs to be done to support people who struggle to manage day-to-day. For example, while energy providers generally respond well to clients who are in arrears, there is little support for clients before this point.

⁴⁶ Money Advice Service, [How to prioritise your debts](#), April 2018.

Similarly, conversations about support for clients in financial services tended to focus mainly on debt, possibly because this is the area where there are the clearest regulatory protections. But a number of advisers said their clients with mental health problems would benefit from wider support, such as help setting up a 'bill account' or direct debits, or learning how to use online banking services. It is likely that other vulnerable people would also benefit from this. But there were very few examples of providers offering this kind of support, or proactively working to identify those who might need it.

"I think the supplier should ask that question at the start, 'have you got a health issue'? I don't think I've ever been asked that question...it's got to come to a head before they ask that question"

- Dan, adviser, North West England

Earlier support could help prevent more serious problems from developing, and ensure that clients are more able to access support in the future. A number of advisers said that having a specific contact, or positive experience of support, was helpful in encouraging clients to reach out to their provider in the future. This is supported by evidence from the Extra Help Unit (EHU):

"Normally in the EHU one caseworker will always be assigned to deal with one consumer, to build understanding and rapport. Some of the suppliers who deal with vulnerable consumers best... apply the same principles, by having one or a small group of agents developing long term relationships with the consumer. This can even include calling consumers before large bills are dispatched or to check payment plans are still suitable at certain intervals."

Some existing schemes are poorly delivered

Even after successfully accessing a support scheme, clients face barriers. For example, it is relatively straightforward to join a Priority Services Register. But if the client needs anything beyond special measures in an emergency, they need to proactively request it. And our evidence shows most people are unaware of the services that exist - so they are unlikely to request them without prompting.

Even if someone requests a specific form of extra support, advisers say there's no guarantee it will be delivered. These findings are supported by information collected from the Ombudsman Services: Energy.

"Where it seems to be a diagnosed illness the majority of suppliers would request the customer's consent and add them to the PSR. This seems to be a

standard course of action and highlights the suppliers that would be able to meet the needs of these customers in emergency situations. However, in the majority of cases reviewed, there did not seem to be many adjustments to meet the everyday needs of the customer.

For example, one customer advised their mental illness meant they could not cope with telephone conversations, but there was no adjustment to only make contact with them by email/letter. Another customer stated their mental illness meant they were not capable of writing and only wanted contact by telephone, but again there was no adjustment made.”

What’s more, Priority Service Registers are delivered individually by each provider. This means consumers need to re-register every time they switch. And there is no guarantee their new energy provider will offer the same priority services as their old one, and consumers will face the same difficulties in getting agreements put into practice.

There is ongoing work to ensure that, with the consent of the customer, information about vulnerability is shared between energy companies. This would reduce the need for people to continually submit their information in order to receive the right support. However the work needed to align systems, codes and legal requirements means that this is a very gradual process.

Those who benefit from the Warm Home Discount may also face a financial penalty for switching.⁴⁷ Only energy providers with over 250,000 customers are obliged to offer the Warm Home Discount - and the eligibility criteria are left, in part, to each provider’s discretion. People could switch for a cheaper tariff, only to find they can no longer access their discount. So not only do patchy, inconsistent services cause additional stress and difficulty - they can also end up penalising those who try to get a better deal.

⁴⁷ Having a mental health problem does not automatically qualify you for the Warm Homes Discount unless you meet other qualifying criteria. However, our research shows that people with mental health problems are more likely to be eligible for each of the qualifying benefits, compared to people without mental health problems.

Conclusion

Our advisers' experiences show that energy, telecoms and financial services do not provide effective enough support for people with mental health problems. The Government's proposal in the recently published [Consumer Green Paper](#), to consider the case for minimum standards of support and identify principles for improving services for people with mental health problems, presents an opportunity to change this.

The government has rightly identified data sharing, open banking, and other new technologies as possible solutions to the difficulty of identifying vulnerable consumers. This is likely to bypass the current 'vicious circle' whereby access to schemes depends on consumer awareness. But even if all vulnerable consumers were aware they could be getting help, our evidence suggests they would still struggle to get meaningful support in practice. Energy, financial service and telecoms markets in particular need to improve the ease of access, breadth and quality of support they offer.

By addressing the key underlying issues of access to and quality of support, government and regulators can help make services work better for people with mental health problems. This in turn will improve services for all vulnerable consumers and ensure essential markets are fit for purpose.

Where support exists, access is too difficult. People are rarely offered help without directly asking for it. And even for those who successfully access support, services are often patchy, inconsistent and poorly delivered. Where support doesn't exist, people with mental health problems can end up getting into debt, experiencing worsening physical and mental health, paying too much for their services or going without essentials altogether.

To work effectively, support services need to be consistent across providers, straightforward for vulnerable people to access, and flexible enough to accommodate a range of needs.

Recommendations

1. Through UKRN and the Consumer Forum, regulators should agree and introduce minimum standards of support for vulnerable consumers across all essential services. Without clear minimum standards, it's difficult for suppliers to be sure they are meeting their obligations - and it's difficult for regulators to hold them to account. From a consumer's perspective, it's

unreasonable that people's needs are accommodated by some essential services but not others. And it's unreasonable that someone could switch suppliers to find they no longer receive the same basic support. Through the Consumer Minister's proposed Consumer Forum, regulators and government should collaboratively identify and implement the minimum standards expected from providers. As a starting point, people with mental health problems should be able to expect:

- Access to well trained, specialist customer support
- Priority repairs of faulty or broken equipment
- They won't be prematurely disconnected due to lack of payment
- Any arrears or debts will be dealt with in-house, rather than being sold on, taken to court or dealt with by a third party.

2. Providers should develop systematic, market-wide mechanisms to record information about vulnerable customers' needs. In order to identify and support vulnerable consumers, providers first need mechanisms for recording (and acting on) this information. This is already standard practice in energy and water in the form of 'Priority Service Registers'. Broadband, mobile and current account providers should follow their example by creating 'support registers' of their own. The support required will vary by sector, and there should be discretion in how this is delivered - but as a minimum, registers should:

- Be held by all providers
- Enable customers to move between providers without re-registering.

3. All providers should offer multiple ways for customers to get in touch in order to request extra support. Restricting the ways in which help can be requested prevents people with mental health problems from accessing support. Consumers should be able to choose, from a range of options, the form of communication that works best for them. And access should never be limited to a single medium.

4. Evidence requirements for accessing support should be simple, consistent, and as low as is feasible. Anyone with a mental health problem should be eligible for basic support with their essential services. This should be explicitly stated on application forms and in promotional materials. For more intensive support where proof of eligibility is needed, providers should be flexible about the evidence they will accept. For example, any evidence that someone is accessing mental health services (including talking therapies, GPs and community health services), should be considered sufficient.

Appendix 1: existing support for people with mental health problems

Duties placed on providers by regulators

There are a number of ways that extra support for vulnerable people is ensured. Some provisions are required by the regulator, which could have been originally required by the government or an EU regulation.⁴⁸ A supplier has to comply with them in order to fulfil a regulator’s licensing condition. Within this, some provisions are more prescriptive than others. This means that in some cases, providers may fulfil their obligations in different ways. Beyond this, some trade associations and individual providers implement voluntary measures that support customers with mental health problems.

Regulator	Obligations
Ofwat	Protect the interests of consumers, wherever appropriate by promoting effective competition with regard to the interests of— <ul style="list-style-type: none">• individuals who are disabled or chronically sick;• individuals of pensionable age;• individuals with low incomes;• individuals residing in rural areas.⁴⁹
Ofgem	Protect the interests of consumers, existing and future, wherever appropriate by promoting effective competition with regard to the interests of: <ul style="list-style-type: none">• Individuals who are disabled or chronically sick• Of pensionable age• With low incomes• Residing in rural areas.⁵⁰

⁴⁸ See the [NAO's briefing note](#) for an overview of the EU laws affecting EU regulation.

⁴⁹ Under section 2 of WIA91.

⁵⁰ Revised Social and Environmental Guidance to the Gas and Electricity Markets Authority issued by the Secretary of State under section 4AB(1) of the Gas Act 1986 and section 3B(1) of the Electricity Act 1989.

FCA	<p>Promote effective competition in the interests of consumers, and secure an appropriate degree of protection for consumers, considering:</p> <ul style="list-style-type: none"> • the differing degrees of experience and expertise that different consumers may have • the needs that consumers may have for advice and accurate information⁵¹ <p>Protect consumers from harm caused by misleading contract terms, poor sales practices or when services are not delivered with appropriate care and skill.⁵²</p>
Ofcom	<p>To further the interests of consumers in relevant markets, where appropriate by promoting competition with regard to such of the following as appear to them to be relevant in the circumstances</p> <ul style="list-style-type: none"> • children and others whose circumstances appear to put them in need of special protection; • the needs of persons with disabilities, of the elderly and of those on low incomes • the different ethnic communities within the United Kingdom and of persons living in rural and in urban areas.⁵³ <p>Enforce general consumer protection legislation in the sectors Ofcom regulates, where this is in the collective interest of consumers; and to uphold the Universal Service Directive.⁵⁴</p>

Water

The main support scheme for vulnerable water customers is WaterSure. This is a mandatory service that water companies must provide to certain customers with a water meter.⁵⁵ To qualify, a customer must be entitled to receive certain benefits and either be responsible for children in full-time education or have a medical condition that requires greater use of water. These customers' bills will be capped so that they pay no more than the average household bill - i.e. the average bill for that particular water company.

Water providers have also voluntarily adopted measures to help their vulnerable customers. These include repayment plans and debt write-off schemes, which provide flexibility for customers in arrears. And they include schemes like Water Direct which directly deducts arrears off customers' benefits. Partnerships with

⁵¹ [Financial Services and Markets Act](#), 2000.

⁵² The FCA is an enforcement body in the [Consumer Rights Act](#), 2015.

⁵³ [Communications Act](#), 2003.

⁵⁴ [Universal Service Order](#), 2003, and the [Communications Act](#), 2003.

⁵⁵ Gov.uk, [Explanatory memorandum to the the water industry \(charges\) \(vulnerable groups\) \(consolidation\) regulation](#), 2015.

third party organisations also exist, which raise awareness about, and facilitate access to, providers' services. The vast majority of water providers have teamed up with Local Citizens Advice offices or community groups. Providers have also partnered with local fire and police organisations and NHS services to organise home visits and distribute priority service leaflets to patients when they are discharged from hospital.

A number of water providers also offer 'priority services' to which customers can sign up. These ensure that consumers who are unable to leave their property - as a result of mental health problems such as agoraphobia - can receive emergency water supply. As well as being able to nominate a third party to make representations on their behalf, customers can receive help with reading their meters and receive personalised customer service assistance. Some providers have put wider customer service training in place so that their staff can spot consumers that may need special assistance. And CC Water has also encouraged water providers to gain 'inclusive service accreditation' by adopting the British Standards Institution's code of practice (BS 18477:2010). This is an inclusive service provision stating the requirements for identifying and responding to consumer vulnerability.

Energy

Ofgem imposes a number of obligations on energy suppliers and network companies, which they must fulfil to meet their licence conditions. Since Ofgem is a principles-based regulator, suppliers often have discretion about how they meet broad outcomes, one of which is establishing a Priority Services Register (PSR) to assist vulnerable consumers. Ofgem's licence conditions require suppliers to take reasonable steps to promote the PSR, identify customers who could be eligible and offer to add their details to it.⁵⁶ Following modifications to Ofgem's PSR license condition, the industry has aligned their PSR needs codes to ensure the data they collect and share is consistent.

More broadly, Ofgem requires companies to identify and understand the characteristics and needs of vulnerable customers. It demands that companies pay due regards to the needs of vulnerable customers who are receiving a smart

⁵⁶ Ofgem, [Electricity supply standard license conditions](#), Licence condition 26. Suppliers must also offer relevant services to that customer (if they've agreed to have their details added to PSR).

meter during its installation.⁵⁷ And it requires that prepayment meters are only used when it's 'safe and reasonably practicable' for the consumer.⁵⁸ Companies with more than 250,000 customers also have to offer a certain number of Warm Home Discounts, which entitle eligible customers to money off their fuel bill during the winter.⁵⁹ Energy companies can also seek support from the [Extra Help Unit \(EHU\)](#), which has statutory duties and powers to resolve complaints from consumers who have been disconnected. It also helps consumers who are vulnerable, including a significant number of people with mental health problems.

Beyond these mandatory measures, some of the bigger energy suppliers have voluntarily adopted measures which assist vulnerable customers.⁶⁰ These include switching guarantees and their own guidelines for prepayment meters. Some suppliers also employ a large unit of specially trained support staff to help vulnerable consumers and ensure customer service staff have receive vulnerability training. A lot of suppliers also have formal partnerships in place with debt charities.

Financial services

The FCA imposes a number of obligations on companies providing financial services. These seek to protect all consumers, rather than those in vulnerable situations. Firms must pay due regard to the interests of their customers and treat them fairly. They must pay due regard to the information needs of their clients. And they must communicate information in a clear manner.⁶¹ Perhaps most importantly for people with mental health problems, the FCA requires firms to establish and implement clear and effective policies and procedures to identify particularly vulnerable customers and deal with these customers appropriately.⁶² This requirement applies only to consumer credit activities - not to all financial service products.

Although, unlike the water and energy regulators, the FCA does not have a specific statutory duty to protect vulnerable consumers, legislation does impose

⁵⁷ There is a separate code of practice for smart meter installation that mandates the treatment of vulnerable consumers - this sits alongside the supplier licence conditions. Ofgem, [Smart Meter Installation Code of Practice](#), 2013.

⁵⁸ Ofgem has released [guidance](#) on what is 'safe and reasonably practicable', 2015.

⁵⁹ The process is complex and difficult to engage with. We hope there will be data-matching place soon which will mean suppliers can automatically send the money/discount to those who qualify.

⁶⁰ Energy UK intend to consolidate all the agreements that relate to vulnerability into one set.

⁶¹ FCA Principles for businesses 6 & 7 and ICOBS.

⁶² CONC 8.2.7.

wider obligations which cover this group. The Financial Services and Markets Act 2000 requires the FCA to have regard to 'the differing degrees of experience and expertise that consumers may have' and the Equality Act 2010 imposes a public sector equality duty which demands that the regulator eliminates discrimination. Similarly, although the FCA has no statutory duty to ensure all consumers can access financial services, it does monitor obligations imposed by the Payment Accounts Directive (PAD) which requires the 9 biggest banks to provide basic bank accounts.⁶³

When the FCA has intervened in markets, its target has often been consumers as a whole rather than a subset of customer. Its price-cap on high-cost short-term lending ('payday loans'), for example, benefited all consumers who would purchase this product.

Telecoms

Ofcom mandates a suite of requirements for disabled people (which in some cases would include mental health conditions) that telecoms providers need to provide. Of these, the most relevant are third party bill management and, in some cases, priority fault repair.⁶⁴ In addition, BT and KCOM are both required to offer at least one social tariff for consumers in receipt of certain means-tested benefits.⁶⁵

Third party bill management enables the customer to nominate a trusted family member or friend to help manage the account, but without becoming liable for the bill. Priority fault repair is offered by all providers of landline telephone services in the UK, to customers who are so disabled as to be dependent on the telephone. This includes people who cannot leave the house due to their mental health symptoms.⁶⁶ This requirement is being extended to broadband from this year.⁶⁷ Evidence of need is required for this service: BT's application form must be countersigned by a doctor and stamped with an official stamp, and other providers have similar processes.

⁶³ FCA, [Payment Accounts Directive](#), 2016.

⁶⁴ Ofcom, [General Conditions](#), GC C5.12.

⁶⁵ Ofcom, [Universal Service Notification](#), Universal Service Condition 2, 2003. BT's social tariff is called BT Basic and KCOM's the Social Access Package.

⁶⁶ For more information, see BT, [BT Free Priority Fault Repair Scheme](#). Other fixed line providers use the same or very similar forms of words to describe eligibility criteria

⁶⁷ Ofcom, [General Conditions](#), C5.11.

In 2017 Ofcom concluded a review of the General Conditions of Entitlement. They made significant changes to the rules, which take effect from 1 October 2018. The relevant changes are outlined below:

Requiring all communications providers to have clear, effective policies and procedures for identifying vulnerable customers – such as people with learning or communication difficulties or those suffering physical or mental illness or bereavement – to ensure they are treated fairly and appropriately.

Extending priority fault repair to broadband, and requiring all communications providers to offer third party bill management and accessible bills.

Expanding telecoms regulations on debt to cover mobile providers. The new rules will require mobile providers to have debt and disconnection practices that are proportionate and not unduly discriminatory.

Appendix 2: Research method

Interviews with local Citizens Advice advisers: sector breakdown

Sector	Advisers interviewed
Energy	20
Financial Services	17
Water	12
Telecoms	10
Other	1 ⁶⁸

Some local Citizens Advice work in partnership with government mental health services, GP surgeries or mental health charities. Of the advisers interviewed for this research:

- 6 work exclusively within mental healthcare settings
- 7 work occasionally in mental healthcare settings (but also deliver advice within their local Citizens Advice)
- 18 do not give advice in mental healthcare settings

⁶⁸ One adviser was a gateway assessor, and did not have particular experience in any of the four sectors.

Appendix 3. Responses from Ombudsmen and the EHU

Ombudsman Services: Energy

Experiences of people with mental health problems and the type of issues we see.

Ombudsman Services: Energy reviewed a selection of cases to assess the actions energy suppliers take when presented with a customer who has mental health problems. Our current data does not specifically record a flag to identify customers who confirm they have a mental health problem. Therefore at present we are not in a position to determine whether these customers are over or under represented among the overall complaints received by Ombudsman Services: Energy. This is an area we are currently working on to address.

In the cases we reviewed, it was found that the customer would say the complaint had been the cause of their anxiety rather than it being a diagnosed illness they have suffered with prior to the complaint starting. This is more likely to be a feeling of stress when dealing with a difficult situation and possibly short-lived, recovering fully when the complaint is resolved. However, we did see some instances of customers with diagnosed illnesses, which included paranoid schizophrenia, depression, PTSD and bipolar, along with anxiety.

Where it seems to be a diagnosed illness the majority of suppliers would request the customer's consent and then add them to the Priority Services Register (PSR). This seems to be a standard course of action and highlights the suppliers would be able to meet the needs of these customers in emergency situations.

However, in the majority of cases reviewed, there did not seem to be many adjustments to meet the everyday needs of the customer. For example, one customer advised their mental illness meant they could not cope with telephone conversations, but there was no adjustment to only make contact with them by email/letter. Another customer stated their mental illness meant they were not capable of writing and only wanted contact by telephone, but again there was no adjustment made. Therefore, while a supplier will put measures in place for emergency situations in line with the PSR, the general trend was that there are no measures for a customer's specific needs.

Some suppliers showed a little more empathy when the customer has an illness and will treat the situation more delicately. Others did not show any empathy and clearly state they cannot comment on health issues and these are the customer's own opinion. We also found that there was no consistency within a supplier itself and it was probably the actions of individual advisers that led to this, some showing more empathy than others.

In terms of complaint types, our sample of cases confirmed the majority of issues related to billing. This reflects the general trend of complaints received by Ombudsman Services: Energy where billing complaints account for approximately three quarters of the total complaints accepted for investigation.

Overall, the two main conclusions were:

- Suppliers are competent at adding the customer to the PSR, when they gain consent from the customer
- Suppliers could do more and make adjustments to try and meet individual customer needs.

These findings are supported by the experiences of our Enquiry Team who register complaints for investigation or provide advice if a complaint does not meet the eligibility criteria for acceptance. The main theme reported were concerns raised by customers around a lack of or delayed responsiveness to reasonable adjustment requests on a consistent basis.

Financial Ombudsman Service

We aren't able to search complaints to this level of detail and often consumers who come to us might not tell us about health issues unless they were relevant to their case. Colleagues in casework and the accessibility team said that in their experience, consumers will often not tell us about mental health issues unless they feel this is relevant to their complaint. Sometimes this might be after we've given them our view on the case. Even anecdotally, we aren't able to say that mental health issues are more commonly raised or more impactful in specific areas of casework.

Ombudsman Services: Communications

Are people with mental health problems over/underrepresented among those who make complaints?

Our current complaint management system does not specifically record whether complainants have a mental health problem. Therefore, at present we are not in a position to say definitively whether people with mental health problems are under or over represented within the complaints we receive. Going forward, our move to a new operating system will provide us with more specific data on this subject.

We have recently carried out an analysis of the telephone calls received by our contact centre to gain a greater understanding of the number of complainants who approach us in vulnerable circumstances. We found that customers mentioned phrases associated with vulnerability in around 10% of cases. Mental health was the third highest category of vulnerability identified in our study, behind people in financial difficulties and people who have been in hospital. We probably receive more complaints from people in vulnerable circumstances than this study suggests – as it is likely that some people did not mention issues that might affect them when making their complaint – but at least provides a guide.

We think it is reasonable to assume that people with mental health problems are under represented within the complaints we receive, for some of the reasons set out by Citizens Advice. Before we can become involved in a dispute, the complainant must first raise the issue with their Communications Provider and give them the opportunity to put things right. If people with mental health problems find it difficult to access complaint handling procedures, they are less likely to ask us to become involved.

It is for this reason that it is important that Communications Providers learn from the complaints that do reach our service. We work with providers to help them to understand the issues driving complaints so that they can improve the services they offer.

What kind of complaints do people with mental health problems tend to make?

Communications providers are required to offer certain services that are available to people with mental health problems – for example, priority service registers for fixed line telephone repairs. However, we sometimes find that customers who may qualify for such services are not made aware of them. It seems to us that some providers do not proactively offer such services and it is left for customers to request services themselves. In some complaints we have reviewed, customers have given clear indications that they are in vulnerable

circumstances when speaking to a Communications Provider, but the Provider had still failed to offer services that might be of use to them.

We also think that some Communications Providers could offer more options to customers who need support managing their accounts. Most providers allow customers to give third parties authorisation on their account, but such authorisation tends to be limited to giving the other person full authority to manage all aspects of the account. It seems to us that some people might like to give someone else the authority to view bills and speak to the provider on their behalf but do not want to give full authority to make changes to their account and order new services. We regularly see complaints where a third party has made changes to an account which the account holder is not happy with.

In some complaints we have reviewed, customers with mental health problems have got into financial difficulties as a result of Communications contracts they have entered. Some customers have, for example, been allowed to take out multiple mobile phone contracts that they cannot afford to pay. In some cases, we have concluded the customer has lacked the capacity to enter into a contract and required providers to cancel accounts without penalty. In other cases, we have concluded that providers could have done more to find a satisfactory resolution to a complaint – for example, by reducing the cost of the price plan a customer signed up to or by only seeking to recover the actual cost of the handset that has been provided.

We acknowledge that it would not be desirable for providers to refuse to supply services to those with mental health problems. However, there may be more they can do to prevent people from entering into contracts which are not in their best interests. In at least one case, the complainant told us that they asked the Communications Provider to mark their account to ensure that they could not take out any further contracts, but the Provider was unable to agree because of computer system limitations.

Similarly, we have reviewed complaints from customers with mental health problems who have run up very large bills that they are unable to pay. For some time, there have been calls for customers to have the facility to be able to specify a cap to be applied to accounts. This is now being introduced in October 2018 for mobile customers. We hope that this will solve this problem – so long as providers ensure all customers are aware of the availability of such caps, including those with mental health problems.

In fixed line complaints, our biggest single category of complaint relates to the quality of service customers receive – in particular, how Communications Providers respond to faults and complaints about broadband speeds. When a customer reports a problem, they are usually required to carry out a series of diagnostic checks to ensure the problem does lie with their own equipment or internal wiring before the service provider will send an engineer to carry out a repair. This might involve moving computer equipment so it can be plugged into the telephone socket, for example. We sometimes receive complaints from customers who are unable to carry out such work themselves. Some providers can send someone out to help customers to complete the tests, but some do not. In consequence, some customers are without service for prolonged periods because the diagnostic checks have not been completed.

We do have concerns about how people with mental health problems are treated when they are in debt. Some providers do not allow customers to set up payment plans when they fall into debt, and instead refer them to debt collection agencies. This can be an upsetting experience. In addition, most providers will suspend the services of customers who fall into debt and will not remove the suspension until the debt has been paid off in full – even if the customer needs to stay in touch with others because of health problems.

We think some providers could do more to recognise and accommodate the needs of different customers. Customers sometimes have strong preferences for how they communicate with providers and setting rigid requirements can result in customers being treated unfairly. For example, one complainant who approaches us told that he suffered from Post Traumatic Stress Disorder and preferred to speak to people in person. He asked his Communications Provider if he could make his complaint in-store, but the Provider refused. In other cases, complainants have expressed a preference to contact the Provider in writing, but the Provider has insisted that they speak to the complainant by telephone.

Do you think our findings are reflective of the difficulties people with mental health problems face in the telecoms sector?

We should bear in mind that different providers approach mental health problems in different ways and that some providers seem to be more effective than others at handling complaints. We should also take account of the fact that the complaints that reach our service are likely to be some of the worst customer experiences and may not be reflective of the sector as a whole. Nevertheless, as can be seen above, the complaints we receive echo many of the findings set out in Citizen Advice's report.

Telecommunications services are increasingly essential utilities, allowing people to shop, socialise and access services. This has presented many new opportunities for telecommunications providers. But it has also placed new responsibilities upon them. Communications providers need to ensure that all customers can access services confidently and without undue problems.

From our discussions with providers, we are aware that there is an acknowledgement that more needs to be done to support customers in vulnerable circumstances. Some providers have asked us to work with them to help them improve the service they offer to such customers. Our initiatives have included facilitating discussions between communications providers and energy suppliers, to help share best practice across industries.

We think the Citizens Advice report has identified some of the key areas in which people with mental health problems are experiencing problems and so it will be extremely useful in helping Communications Providers to identify areas in which improvements can be made to ensure services are accessible to all.

Extra Help Unit

Are people with mental health problems significantly over or underrepresented among those who make complaints?

We have noticed over the past 2 – 3 years that a growing proportion of consumers are people affected by mental health concerns. Many vulnerable consumers are now identified and supported much better by suppliers, however consumers with mental health conditions are often not identified, instead being perceived to be difficult or unreasonable, and therefore the fact they have mental health concerns is not properly identified or understood. Even when a consumer has informed the supplier of the fact that they have mental health concerns, there seems to be poor awareness and understanding of how the condition affects consumers and how they need to be supported.

Currently I can't provide statistics to say how many consumers referred to the EHU have mental health concerns. However I can confidently say that a very significant percentage of the consumers referred to the EHU have told us that they have some form of mental health concern.

What kind of complaints do people with mental health problems tend to make - are these the same as general complaints trend? Or are people with mental health problems particularly affected by certain issues?

I don't think there is a particular issue that affect people with mental health conditions more than others. There is possibly some more issues reported due to escalating debt problems, as some people with mental health concerns may not actively seek assistance until a situation has escalated, or have tried to deal with the supplier themselves and found they have struggled to make progress with their suppliers customer service department over an extended period.

Does the support providers offer to people with mental health problems adequately meet their needs?

For people with mental health concerns, I feel the main benefit of the PSR is that it places a flag on the account to identify that this is a person who may need extra support. Individual people with mental health concerns may benefit from quarterly meter readings or password protection for supplier visits. However I think simply flagging that someone may have special requirements can be used as a tool to alert customer service staff that extra consideration is required, more time may need to be spent on the phone call, communication at certain times of the day may be advisable, that the consumers behaviour is not as a result of them being unreasonable etc. The customer service staff involved still need to understand the concept of mental health concerns and have some knowledge of how they can tailor their interactions to make sure the correct outcomes are achieved. Given the various requirements that someone with mental health could have, IT systems need to allow customer service agents to easily see not only that a consumer has mental health concerns, but whether there are specific things that they can do to support that consumer more effectively.

Normally in the EHU one caseworker will always be assigned to deal with one consumer, to build understanding and rapport. Some of the suppliers who deal with vulnerable consumers best (including those with mental health concerns) apply the same principles, by having one or a small group of agents developing long term relationships with the consumer. This can even include calling consumers before large bills are dispatched or to check payment plans are still suitable at certain intervals.

Accessing the PSR and knowledge of the PSR from frontline customer service staff can often be poor. Although this can be true of all suppliers, some of the smaller suppliers are particularly poor in this area.

Compared to our average client, what kind of support do people with mental health problems need from the EHU?

Some complaints for consumers with mental health concerns can be more difficult to handle, as it can take several calls with the consumer to get all the information we need to articulate the concerns effectively to the supplier, although our team are very experienced and efficient in working with people with mental health concerns. Depending on the circumstance we can have situations when people do not want to communicate with us for periods of time and we need to encourage them to engage with us again, and also consider how we approach this - are there times of day or the week when it is better to call the person for example. Sometimes we need to allow the consumer time to come back to us when they feel they are in a better position to deal with the case - and suspend action with the supplier in the meantime. There will be situations when EHU Caseworkers and Managers accept some verbally aggressive behaviour - we have found frequently that people who have behaved in this way later apologise or thank the Caseworker/Manager for helping them resolve the problem involving their energy supplier, as they have struggled to fix it for so long and feel someone has now listened and supported them.

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