

Citizens Advice

Consumer work plan 2024-25



Foreword

In our last annual work plan, we highlighted the unprecedented demand for advice that our service was seeing. The following year has seen the need for help escalate still further, with record demands for our help and far too many households reaching crisis point. We have seen further increases in the number of people approaching us who have negative budgets - spending more on essentials than they have coming in. And many more are on the brink, one unexpected cost away from their finances spiralling out of control.

While inflation is starting to fall, basic costs such as energy bills remain stubbornly high. Our work for the coming year will remain framed by the backdrop of a deep cost-of-living crisis.

While consumers struggle to pay their current bills, the sectors that serve them are changing rapidly. The way we produce and consume energy must evolve quickly if we are to meet our net zero targets. With fewer letters being sent, the future of mail services is under threat creating significant challenges for the consumers who rely on them. Artificial Intelligence and the power of data processing is opening up real opportunities and challenges in a range of markets. It has never been easier to personalise products and services to an individual's advantage or to discriminate or disenfranchise them.

Against this backdrop of crisis and change, ensuring a fair deal for consumers, and particularly for people from marginalised groups, remains essential. New technologies, products and services can deliver savings but they must be designed in a way that protects the interests of consumers. We will ensure that consumers' voices are heard in that process.

Our own role is evolving, as we will be preparing to take on new duties as the statutory consumer advocate for heat networks during this financial year. This requires new funding, alongside a wider budget increase for our energy advocacy work to help us manage the increasing demands for our input and insight from regulators and government departments.

The four main themes for our work in 2024/25 are:

- Future-proofing markets to meet evolving challenges
- Addressing affordability issues in essential markets
- Infrastructure that delivers value for consumers
- Harnessing innovation to build fairness into essential services

These themes will guide our advocacy work in the coming year. They will provide us with a framework but not a straitjacket for our work, as we will also need to respond to emerging challenges.

We remain committed to delivering positive outcomes for consumers throughout the difficult year ahead.

Dame Clare Moriarty

Chief Executive Officer, Citizens Advice



Equity, diversity and inclusion (EDI)

We have continued to make progress against our 3 equity, diversity and inclusion commitments:

- Integrating equality by design into every major advocacy project we undertake
- Doing regular stock takes of our data to understand how our clients' problems map against protected characteristics to identify any gaps in our advocacy work
- Ensuring at least one of our policy changes each year has a positive impact on groups who experience intense disadvantage, detriment or harm

Relevant examples include:

- Using our data on experiences of online choice architecture to identify differences in how design patterns affect different groups of consumers
- Highlighting how the cost of living crisis has been felt by some groups more than others
- Exploring how <u>targeting energy efficiency policies may</u> need to change to reflect the differing needs and barriers of racially minoritised people

To ensure that equity, diversity and inclusion considerations are at the heart of all our advocacy work, we have made a number of changes to the ways in which we design and prioritise our work. These include:

- Ensuring that EDI implications are outlined within every influencing plan - these must be completed and signed off for every advocacy project at Citizens Advice, and they are reviewed regularly by our Leadership Team.
- Scoring competitive research tenders on their EDI considerations
- Creating an EDI in research checklist to ensure all our policy research projects are inclusive and accessible in design

In addition, we've built new tools and programmes to help us ensure that our policy work is supporting marginalised communities including:

- Our <u>EDI dashboard</u> which illustrates the issues clients are coming to us about by protected characteristics, including intersectionality this means we can identify the policy areas where our work will have the greatest impact on marginalised groups
- Our Citizens Advice <u>cost-of-living data dashboard</u> which shows the impact of the crisis on different groups (including by protected characteristics) and clearly demonstrates the fact that the cost-of-living crisis is not impacting everyone equally.

We've made both of these tools publicly available, and hold regular cost-of-living dashboard events to allow us to share our data with key stakeholders and demonstrate the inequitable nature of this crisis. We will continue to ensure that equity, diversity and inclusion considerations are at the heart of all our advocacy work and that we're championing the needs of marginalised groups.



A robust and impactful approach

As an advocate working for consumers, we do everything we can to maximise our impact and to make decisions based on evidence. To guide our thinking, we have designed our work plan on the basis of **4 principles**.

1. Our work is proportionate to the evidence or risk of consumer detriment

We build our work plan on the principle of proportionality. To do this, we focus our efforts on areas where we have reason to believe detriment to consumers could be averted. We assess the need for action against 6 core outcomes that characterise a successful consumer market.

6 core outcomes that characterise a successful consumer market

Value	Products and services are good value for money	
Inclusive	All consumers are served well, including those in vulnerable circumstances	
Quality	Consumers get what they pay for. Their reasonable expectations are met or exceeded	
Redress	If things go wrong, they're put right quickly, with compensation where appropriate	
Protected	Products and services are safe and secure to use	
Sustainable	The needs of current consumers are met without jeopardising the needs of future generations	

2. We apply unique insights, adding value over and above other organisations

We ensure our work adds value that is additional to that provided by other organisations.

A key aspect of this is our data. We have millions of contacts with consumers through our Consumer Service, Extra Help Unit and local Citizens Advice offices. We use this to inform our advocacy work and develop solutions to the problems people face.

Another aspect is the cross-cutting perspective we provide. The value of this is increasing as technology blurs boundaries between markets. Regulators and consumer advocacy bodies must increasingly learn lessons and develop solutions across sectors. To reflect this, this year's work plan is again designed around cross-cutting themes rather than specific markets.

3. We engage consumer groups, government and regulators to avoid duplication

We want to have an open and substantive conversation about the work we do and how we do it. The consultation on the draft work plan earlier this year was the first step in this. But this isn't a one-off process.

This work plan is a living document and we will meet regularly with regulators, industry, other consumer bodies and charities, and government officials to discuss and refine our work throughout the year. We engage in many formal processes to embed our work in the wider context, avoid duplication, and make sure we complement the work of like-minded organisations.

4. We focus on outcomes, using both advocacy and research to shape decisions

While there are many positive outcomes from our work, the most tangible and measurable are better financial returns for consumers.

As well as immediate financial benefits, we look to the long term and prevent costs for consumers before they arise. In recent years our work has paid dividends on this.

How our advice and advocacy roles support each other

Our advice provision gives us unique insights into the problems people face, with real-time data.

We use this to advocate for evidence-based policy changes that deliver the biggest improvements in outcomes for consumers.

Advice provision

Our local Citizens Advice offices (LCAs)

provide face-to-face advice on a range of issues in over 3,300 locations across England and Wales.

LCAs

EHU

The Extra Help Unit (EHU) is a

specialist support service investigating complaints for domestic and micro business energy consumers, and postal service users, who are in vulnerable circumstances across Great Britain. The service is managed by Citizens Advice Scotland.

Other advice projects

Consumer service

Our consumer service gives advice on all

consumer issues, with specialist advice on energy and post issues.

Policy and advocacy

Social policy

Cross sector consumer policy

Post policy

Energy policy

Our policy and advocacy work gives us insight into the organisations and systems consumers deal with and into the emerging risks for consumers.

This helps us provide advice and support that is up-to-date and effective.

> Non-statutory role Statutory role

Work plan projects

Our energy, post and cross-sector consumer projects for 2024-25

Four themes for our work

Applying these principles, this document sets out our plans for 2024-25. There are 4 themes for our work this year.

Future-proofing markets to meet evolving challenges

Addressing affordability issues in essential markets

Infrastructure that delivers value for consumers

Harnessing innovation to build fairness into service

For each theme we have also included success stories from the past year. More information about our work from 2022-23 can be found in our <u>Annual Report</u>.

We have also indicated which sector each project covers with these icons:

Energy



Post



Cross-sector consumer

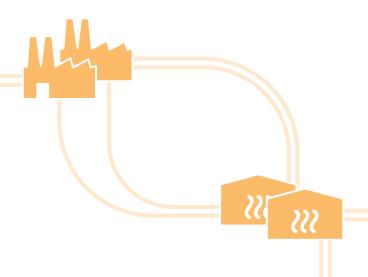


Preparing for our new role as the heat network advocate and advice provider

Heat networks supply heat from a central source to consumers, via a network of pipes carrying hot water.

They can cover a large area or even an entire city, or be fairly local supplying a small cluster of buildings. Heat networks are typically much smaller than electricity or gas networks, and there are around 14,000 in Great Britain in total.

By supplying multiple buildings, heat networks avoid the need for individual boilers or electric heaters in every building. They can also use local sources of low carbon heat which would otherwise go to waste. This could be from factories, the ground or even from rivers. Because of this, a significant expansion in the number of homes and businesses on heat networks is expected as we look to decarbonise the way we heat our homes and buildings.





But heat networks have historically been unregulated monopolies, which has caused some concerns that consumers may not be adequately protected against poor or exploitative commercial practices. The Government has acted to remove that protection gap with the passage of the Energy Act 2023, which provides for a heat network regulator. That role has been assigned to the existing electricity and gas regulator, Ofgem.

The Government will extend Citizens Advice's role so that it can act as the statutory representative of consumers on heat networks in England and Wales. There are obvious synergies in our taking on this role given that we already carry out that function for electricity and gas consumers. Our current understanding is that the Heat Network regulations will go live from April 2025.

To hit the ground running from April 2025, we'll need to conduct preparatory work in work plan year 2024/25. We expect to:

- Build our baseline understanding and evidence base of the consumer experience of heat networks reviewing existing research in this space and talking to stakeholders to get their take on areas we should be focussing on. We will commission our own consumer research with consumers using heat networks to understand their experiences and identify areas of detriment.
- **Establish a monitoring function.** Gathering frontline intelligence on the consumer experience of heat networks and sharing these insights with Ofgem, Government and other key stakeholders will be an important aspect of this role. We have a lot of experience in this area which we can learn from through our monitoring function which sits within the energy retail team. In the first instance the focus will be on:
 - Mapping out available intelligence sources,
 - Developing data monitoring processes internally
 - Agreeing data sharing agreements with Ofgem and other key partners, and
 - Putting in place statutory information request arrangements with heat networks using our information gathering powers.

- Build our profile amongst consumers and stakeholders. A priority for the first year will be building awareness of our new role and the work that we'll be doing with consumers and stakeholders within the heat sector and more broadly. We'll develop more detailed plans for this once we have a team in place, but activities could include public awareness campaigns, parliamentary drop ins, attending and arranging stakeholder events and targeted one to one meetings with senior stakeholders.
- Ensure the consumer voice is heard in key debates. Decisions due to be made in the next few years will be pivotal in shaping the consumer experience of heat networks for years to come. As a new regulatory framework is put in place and beds in, it is vital that we're able to be a strong and influential advocate for consumers. We'll contribute to these policy making processes; working with Ofgem as it develops the new regulations, attending events and building trusted stakeholder relationships.
- Prepare for our new advice and support role. We will begin work on setting up our new advice function as well as a new Extra Help Unit style service for consumers on heat networks, ready for the launch of the new arrangements in April 2025.

The pace of change in the consumer economy is fast and ever-increasing. The need to decarbonise our economy will revolutionise the way we produce and consume energy. The postal service is transforming towards a parcels market with fewer people sending letters. Big Data is opening up new opportunities for companies to exploit consumer data, bringing opportunities for some but the prospect of discrimination and disenfranchisement for others. We will work to ensure that evolving consumer markets better meet consumers' needs across England, Wales and Scotland.



Understanding how suppliers can meet consumers' needs in the future energy system

Between July 2021 and July 2022, 29 energy suppliers failed. This market meltdown called into question the way energy suppliers had been working and the effectiveness of regulation. It also undermined consumer trust in the sector and discouraged consumers from switching suppliers. As part of the transition to net zero, energy consumers will need to play a more active role in the energy system. They may be encouraged to shift their demand and store energy in their homes and vehicles.

We will continue to look at how suppliers can best meet consumers' needs. This includes considering the suppliers' role in the energy system, building on our recent paper Ripping Off the Band-Aids on enabling more supplier specialisation, and the impacts on the universal service obligation and default products. This will include an ongoing examination of the potential benefits and drawbacks of different supply models, including identifying where barriers are faced by particular demographic groups.

This work will consider how consumers can be supported to understand energy products as they get more complex. We'll continue to publish our star rating on energy supplier customer service (see p.26) to support informed decision making. In 2024/25 we'll review the methodology, and work closely with Ofgem as it develops its own data on satisfaction to ensure these work well together to support consumer understanding.

Effective consumer interest representation in an evolving energy landscape

The energy system is changing rapidly, and so is the way it is managed. Key to these changes are the creation of a Future System Operator and reform to the codes that govern the industry. This provides an opportunity to put consumer interests at the heart of decisions.

We will build a close working relationship with the Future System Operator to help it fulfil its duty to reflect consumer interests and understand the potential impacts on consumers of changes to the energy system. We will also work closely with the government and Ofgem to ensure adequate consumer representation in the reformed code landscape and effective scrutiny of code modifications.

The rollout of smart metering and the Market Wide Half Hourly Settlement programme are the building blocks of the new energy system. We will consider the strategy for maximising their benefits and how this can be delivered in practice..



Monitoring the effect of the Consumer Duty

The Financial Conduct Authority's Consumer Duty came into force in July 2023, with the aim of improving outcomes for consumers. As it comes to the end of its first year it will be important to monitor the impacts of the duty, to understand how it's affecting consumer experience.

We will use our service data to identify where the Duty is being effective, or areas that would benefit from further attention from the FCA.

We will consider whether the consumer duty is providing better outcomes on known consumer issues. This will include exploring practices around forbearance, and identifying whether action has been taken to tackle the ethnicity penalty in car insurance. We will revisit these issues in summer 2024 to explore whether progress has been made.

We will consider how to apply the lessons learnt from the consumer duty in financial services to other sectors and services, such as post and energy.



Supporting microbusiness consumers

95% of all businesses are microbusinesses, employing less than 10 people. They enjoy far fewer protections than domestic consumers. We will review whether current regulations go far enough to protect them, with a particular focus on debt and disconnection practices.

Ofgem has recently consulted on whether consumer protections should be expanded to businesses larger than microbusinesses. We will continue to work with Ofgem and the Government to extend our advice and advocacy services should this be required.



Understanding postal consumers' evolving needs

The postal sector is undergoing profound changes. Parcel volumes have increased rapidly over the last decade. Yet at the same time we have seen a decline in letter volumes and the conditions Royal Mail must meet under the Universal Service Obligation (USO) are under scrutiny. These trends, plus changes in the wider context such as the move towards net zero, raise important questions about how postal services will adapt - and how they can do so in a way which continues to meet consumer needs.

With the backdrop of the last few years one of ongoing delays for letter consumers, 1 in 3 experiencing problems with their last parcel delivery, and millions shut out of access to post for lack of a secure address, there's a debate around what the future of postal services should look like. We will therefore carry out cross-cutting foundational research to explore both current use of postal services and what consumers want moving forwards. As part of this research, we will talk to consumers about the future shape of the USO, the options for reducing delivery problems in an expanded parcels market, and the role of postal services in reaching net zero to understand consumers' priorities for a rapidly evolving postal sector.

Designing a regulatory framework fit for the future

With the letters market monopolised by Royal Mail and much of the leverage in the parcels market linked to retailers rather than consumers, regulation plays a vital role in the consumer experience of the postal sector.

Yet, at the moment, Ofcom's tends to be reluctant to intervene and slow to act. For example, we first raised the issues disabled people face in the parcels market back in 2018. But Ofcom has only finally introduced a new condition in this area 5 years later, in autumn 2023. This year, our 3rd parcels league table revealed consumers still faced poor service across the board, and our research found almost 1 in 3 adults affected by letter delays in early summer 2023.

In 2024/25 we will continue to research and advocate for a more powerful, proactive regulatory framework, better capable of tackling consumer harm. We will:

- Review existing evidence of postal regulation and compare approaches in other regulated essential service markets, such as the FCA's Consumer Duty, and the lessons from other sectors experiencing transition, such as energy.
- Remain closely involved in Ofcom's review of the USO, advocating for a framework to improve consumer outcomes.
- Assess the effectiveness of Ofcom's new guidance around complaints and it's new accessibility related condition.
- Develop our own vision for a regulatory framework that truly benefits consumers, based on consumer preferences and regulatory mapping.

Addressing affordability issues in essential markets

The cost of living crisis is deep and broad. 2023 saw unprecedented levels of demand for our advice services and it is clear that many households are overwhelmed by the financial challenges that they face. We will work to identify - and deliver - positive changes in essential services markets that put money back into their pockets. Much of our work will be GB-wide, though our work on fuel poverty will concentrate on England and Wales, respecting that it is a devolved matter in Scotland and sits within Consumer Scotland's remit.



A market safety net for essential services

Many essential services are delivered by markets - but the cost-of-living crisis has revealed that they can't provide reliably affordable access for low income consumers. We continue to see record numbers of people turning to us for help with support for their energy bills and our research has found that millions have been priced out of essential markets like broadband, mobile and insurance.

These consumers need a safety net to be put in place in essential markets, to ensure they can retain affordable access to the services they need. We will explore what it could look like in the short and long term. In addition to our work on targeted bill support in energy, we'll look in detail at three other essential markets: water, broadband and insurance. Some support for lower income consumers exists in the water and broadband markets, but uptake is low and there is a postcode lottery aspect to what support is available. In insurance, there's currently nothing on the table to help people on low incomes afford to stay insured.

Building on our Closing the Gap report, we'll work with the government and regulators to ensure plans for a <u>new</u> multi-sector priority services register meet people's needs. In the future, this would make it easier to target support to those who need it most.

Addressing affordability issues in essential markets



Fair value for consumers in essential markets

Consumers have experienced sharp increases in the cost of essentials. Energy bills are nearly double what they were in summer 2021. Costs have also increased across a range of essential services, including water, telecoms and insurance. Where price rises are taking place, many consumers would expect to see improvements to service delivery. But in some markets consumers may be paying more for a poorer quality service.

In 2024/25 we'll monitor our data to identify where consumers are experiencing poorer outcomes - and speak out where we find consumers are getting a poor deal. Where necessary, we'll advocate for regulatory action to be taken to ensure promises of improvements in service delivery are being kept and consumers are getting better value for increased prices.



Making prepay work better for consumers

Following the publication of Kept in the Dark at the start of 2023, Ofgem strengthened the protections for prepay customers and introduced a moratorium on force fitting prepay meters. Suppliers are gradually being allowed to restart this process subject to tough new safeguards. As restarts happen, we'll rigorously monitor contacts to our service to ensure consumers are protected and prevent the re-emergence of poor practice.

Citizens Advice continues to help growing numbers of people who cannot afford to top up their prepayment meters, with these figures reported in our monthly cost of living dashboard. Our advice and referral relationships to suppliers, the Extra Help Unit and the Fuel Bank Foundation are making a difference for many, but we are keen to see support improve further..

A key challenge is being able to identify households on traditional prepayment meters who are regularly self disconnecting. We will work with Ofgem and energy suppliers to improve outcomes, aiming to significantly reduce the number of consumers who are self-disconnecting for 3 hours or more.

We'll analyse the barriers to smart meter uptake among consumers on traditional prepayment meters, and work with energy suppliers and others to ensure these consumers are offered appropriate solutions, energy efficiency and technological support to minimise the risk of self-disconnecting.

Addressing affordability issues in essential markets

4

Targeted bill support in an era of higher energy bills

Energy prices have risen significantly since 2021, and despite welcome falls from their peak may remain elevated throughout the 2020s. Reforms like half hourly settlement and possible changes to wholesale market and energy levy design may also change how costs are distributed between consumers.

We are seeing the impact of rising prices in record levels of energy debt and significantly higher numbers of people needing support from Citizens Advice because they can't afford to pay their bill or top up their meter. Following support provided to all households during 2022/23, it's vital to ensure that consumers at most risk are able to afford their essential energy needs.

In 2023 we completed a major project <u>Fairer</u>, <u>Warmer</u>, <u>Cheaper</u> which considered design options for new targeted bill support, based on focus groups and polling and working with a panel of expert stakeholders. We refined these options in <u>Shock Proof</u> to take account of changing fiscal and market conditions, and to ensure that solutions can be delivered more rapidly.

In 2024/25 we will continue to make the case for targeted enduring support and demonstrate the role it can play in safeguarding consumers and maintaining support for net zero. We'll also make the case for better support and protection for consumers who have built up unmanageable energy debt. This includes engaging with Ofgem's work on standing charges and affordability to make the case for solutions that are sustainable for the long term and <u>fair to all consumers</u>.

\geq

Making sure essential postal services are affordable

The price of a first class stamp has increased 3 times more quickly than second class stamps, which are protected by a price cap. But Royal Mail have said that they want to remove this price cap - the only price protection in this essential market. With Ofcom considering the future outline of the Universal Service Obligation, it is more important than ever that we continue to advocate for effective affordability measures - such as the price cap - for consumers who rely on affordable access to postal services.

We also plan to explore and highlight the growing digital exclusion penalty in post. People who buy USO postage in person are charged more than people who buy online, with a 22% price difference for someone purchasing a 2kg 2nd class medium parcel. This means digitally excluded consumers - who tend to be more reliant on post - end up paying more for something which should be a universal service.

Finally, we will review and assess the effectiveness of recent affordability measures including mail redirections. Redirections are essential when you move house to protect against fraud and financial harm. Royal Mail re-launched a discount scheme for people on certain benefits in 2021 but there's no official uptake figures from Ofcom to assess how this is working. We'll explore consumer awareness and perceptions of the discount scheme, to make sure that consumers aren't missing out on considerable savings when they move.

Infrastructure that delivers value for consumers

Essential markets rely on investment in both new projects and in maintaining existing infrastructure, funded by either consumers or taxpayers. The requirement to reach net zero emissions provides an added challenge, requiring a transformation of the economy as a whole. Investment must be well managed to ensure value for money and good consumer outcomes. In markets dominated by a monopoly provider, regulators need to act to make sure consumers don't pay more than they need to for an essential service. We will consider the regional impacts of infrastructure investment, and any differential impacts between England, Wales and Scotland.



Delivering value for money net zero infrastructure

The transition to net zero requires investment in the energy infrastructure in the coming decade. This will enable consumers to use low-carbon technologies and benefit from cheaper renewable energy.

Net zero infrastructure investment needs to offer good value for money. On behalf of consumers, we will scrutinise the arrangements for funding and delivering new infrastructure and engage with the process of setting new price controls for Transmission and Gas Distribution. An early part of this engagement is to see what aspects of the price control process need the most improvement. We'll review how well the current controls are providing value for money.

We will also continue to consider how the right balance is found between the interests of communities hosting this infrastructure and the benefits to wider society.

We'll continue our work with local authorities and energy networks to put consumers at the heart of plans for delivering net zero at a local level. We'll work closely with Ofgem to make sure that plans for a Future Systems Operator (FSO) and Regional Energy Strategic Planner (RESPs) are joined up with Local Area Energy Plans (LAEPs) to amplify the voices and experiences of local communities. And building on our Close to Home report, we'll keep advocating for the expansion of Local Area Energy Plans (LAEPs) and the inclusion of community engagement as a key part of this process.

Infrastructure that delivers value for consumers



Monitoring network performance

Network costs make up approximately 20% of our energy bill. We will work to improve our ability, and that of other parties, to scrutinise how network companies are performing including by comparing across companies. This will include working with Ofgem and others to improve the accessibility, range of analysis, and reporting of network performance. It will also include working with network companies to provide transparency, and comparability, of performance against business plan commitments.

We can then combine this information with insights from our own data regarding consumers' interactions with network companies to highlight emerging trends.



Making the most of innovation funding

Various sources of funding are available to encourage the development of innovative approaches to solving some of the challenges to delivering net zero. We will look across the different funding pots and see how well all the different initiatives work together. We will also look at how well the interests of consumers are represented through the Innovation lifecycle - from when the specific challenges to be addressed through innovation funding are identified, to how successful ideas are rolled out.



Holding Royal Mail accountable for delivering for consumers

Royal Mail has failed to meet its delivery targets under the USO in 4 out of the last 5 years. And it didn't hit its target in a single postcode area in the first half of this year. Consumers want and need reliable postal services and good value for money. But almost 1 in 3 were hit by delays last summer, and 7.3 million experienced negative consequences as a result. This included missing health appointments, fines or bills.

Citizens Advice will continue to hold Royal Mail accountable for quality of service failures and the harm caused to consumers. This is particularly important for letters where, given Royal Mail's virtual monopoly, people have nowhere else to go for their mail. In 2024/25, we will monitor Royal Mail delivery delays. If we continue to observe quality of service issues in the coming year, we'll engage with Royal Mail and Ofcom, carry out tactical research and provide advice to consumers.

Infrastructure that delivers value for consumers

Monitoring performance in the parcels market

Rates of online shopping have more than doubled in the last decade, with almost 4 billion parcels delivered to households across the country in 2022-3. Yet our most recent parcels league table found that consumers face poor service across the board, with little to no improvement in scores since the previous year. We again found that over a third (34%) of those who'd had a parcel delivered in the last month experienced a problem. And almost half (43%) then faced further problems when resolving their parcel issue.

Ofcom's changes to the regulatory guidance around complaints and accessibility are a step in the right direction but, as the league table results show, far more needs to be done to improve outcomes for consumers. Next year we will continue to monitor the parcel market's performance through our annual league table and work with Ofcom and individual carriers to ensure that the issues highlighted in last year's table are tackled.

The future of the post office network

The next government faces some important decisions over the future size, shape and role of the post office network. People in vulnerable circumstances, those living in rural areas, and small businesses are particularly reliant on post offices to access services. We're therefore concerned that decisions are taken in a way that ensures post offices can continue to meet most consumers' needs, particularly those in these groups.

Our previous research has highlighted a big increase in part-time outreach services and decline in full-time services, which has had a significant impact on those who rely most on post offices. In addition, a decision on the future of government funding to support the most rural branches is due in March 2025.

In the coming year, we will:

- Carry out research to understand what post office access people really need, looking at aspects such proximity to a branch and range of services, in the context of the challenges facing the network
- Provide input into discussions and consultations on the future shape and role of the post office network
- Make the case for the continuation of subsidy to support the most rural post offices beyond March 2025

Consumers in vulnerable circumstances are more likely to experience harm in essential service markets. Our previous research showed that these consumers are more likely to be paying a high loyalty penalty. They can find it harder to access essential services. And they're more likely to come to Citizens Advice for help. It doesn't have to be this way. Smart, sensitive design can deliver products and services that better meet people's needs.



7 Ensuring consumers have access to the products, services and support they need in an increasingly digital world

The UK has seen a rapid period of increasing digitisation. At the same time provision of face-to-face services has declined across a range of sectors. This may leave some consumers in vulnerable circumstances at greater risk when it comes to accessing the products, services and support they need.

We will monitor data from our advice networks to identify where consumers are facing difficulty accessing products, services and support, and engage with sector regulators where necessary to ensure consumers in vulnerable circumstances can access the services and support they need.

This will also include identifying areas where digitisation may increase risks for consumers, for example where it may leave consumers more exposed to scams or bad actors.

Harnessing innovation to alleviate fuel poverty

There are rising numbers of households in fuel poverty. Schemes such as the Energy Company Obligation (ECO4), the Great British Insulation Scheme (GBIS) and the Home Upgrade Grant (HUG) offer low-income households support with energy efficiency measures and low-carbon heating. These schemes are key to enabling households to move out of fuel poverty, keeping people warmer and helping to meet fuel poverty targets. But take-up is lower than needed in part because identifying eligible households continues to be challenging. Our work in 2024/25 will focus on how to improve access, identifying what support is needed to increase take up.

We will explore opportunities to maximise insights from anonymised "metadata" collected by the Data Communications Company (DCC). This includes information on when consumers top up their pre-payment meters, when they receive low credit warnings and when they disconnect. Those insights can be used to identify consumers in fuel poverty, particularly when combined with other data sets from local authorities. If organisations providing support - whether energy networks, suppliers or local authorities - also have access to geographic data they will be able to target support to the households that need it most.

This will help ensure that energy companies are better able to reach out to different groups of consumers and provide them with the support and services they need.

Making sure consumers benefit from future services - flexibility & retrofit

Meeting net zero targets will require changes both to our homes and the energy market more widely. We know there are specific barriers to adapting existing homes and accessing products or services that enable flexible, better value energy use.

Building on our **Demand: Net Zero report**, we will continue work on funding options for homeowners and landlords as well as focussing on the role of trust in driving behaviour changes. We will continue to build our understanding of what's needed to inspire specific demographic groups to make changes to their homes.

We will regularly monitor case data from our Consumer Service relating to low carbon home technologies and work with partners to ensure that any emerging issues are rectified as swiftly as possible. Our Home Safe report outlined how to future proof the consumer protection regime and we will continue to make the case for mandatory consumer protections in the net zero retrofit market.

We want more households to be rewarded for increasing their energy flexibility, as this can reduce overall energy energy systems costs. Our work in 2024/25 will have a particular focus on those who are digitally disadvantaged. This will include continued engagement with the government's Review of Electricity Market Arrangements and reforms to network charges. We will explore how these changes will impact consumers and how system costs are reflected in services and products offered to consumers.



Protecting consumers from digital design harms

Design isn't neutral. There are many ways that design decisions affect the choices we make online, from people unwittingly taking out Buy Now Pay Later products, to purchasing things they didn't want or need, or finding themselves stuck in a subscription they didn't mean to take out.

In 2024/25, we will continue to push for legislative and regulatory changes that deliver better outcomes for consumers' shopping for products and services online. We will continue to engage with the Digital Markets, Competition and Consumers Bill as it progresses through Parliament. We will also be considering other tools and approaches that could be used to prevent more digital design harms from developing, including exploring the role of outcomes based regulation akin to the Consumer Duty model.

We will build on this work by exploring why certain design practices are contributing to disproportionately poor outcomes for consumers in vulnerable circumstances. We will use these insights to identify recommendations to ensure that they don't pay the price for poor design.

We will also undertake horizon scanning work in relation to Artificial Intelligence, and identify where there may be additional risks or opportunities for consumers.



Ensuring networks deliver for at-risk customers

The energy market should be accessible, inclusive and responsive to energy consumers' needs. Energy networks can access funding to support vulnerable customers, including those in or at risk of fuel poverty, under the RIIO framework.

This year, we will carry out research to improve our understanding of the needs and expectations of consumers in circumstances that put them at higher risk of disadvantage and harm. The research will evaluate the effectiveness of projects designed to assist customers on the Priority Service Register and projects that address fuel poverty. We will also explore how these needs and expectations can be met. This research will focus on electricity networks, as consumers increasingly rely on electricity.

We will use the research results to develop policy recommendations and advocate for their adoption by relevant networks.

Making post a truly universal service for all consumers, even the most marginalised

Our previous research found that, in the decade leading up to 2020, 7 million people weren't able to access their post - either because they didn't have a fixed address or because someone was intercepting it. These people struggle to access essential support and services, often at a point when they need help most.

Since 2018, we've worked with industry, regulators, charities and people with lived experience to develop a solution. This 'Address & Collect' service would allow people who don't have access to post to collect their letters at a post office. Similar models have already proved successful in other countries.

We believe this issue harms consumers every day it goes unresolved. And cost of living pressures mean it's getting worse. At Citizens Advice, we've helped more people with a homelessness issue this year than we had at the same point in any of the past 6 years.

This year we have begun research looking into the impact of the cost of living crisis on access to post. In the next financial year, we will continue making the case to government and Ofcom that a solution needs to be found to stop more people being shut out of an essential service.

Providing clients with tailored energy advice

Advice has and continues to play a fundamental role in the energy market. Over the last few years, demand has been volatile as the market reacted to significant supplier failures, an energy crisis and changes to bill support policy. Though energy prices have decreased, we know the reality is much the same for households struggling to pay their bills this winter and it is likely these problems become more entrenched over time.

We know a greater emphasis needs to be placed on creating pathways for additional support, such as income maximisation and debt. In the short term, we'll look to identify referral routes for our clients to responding to a growing affordability demand.

This year, we'll continue to respond to local demand through our Energy Advice Project and through the Energy Outreach Project we run (formerly known as Big Energy Saving Network), particularly focusing on how we can reach marginalised communities needing our support.

We'll use other channels for targeted advice, such as our online and campaign content. We'll react year round to make sure the most up to date and relevant information is readily available to clients.

Success story:

Every quarter, Citizens Advice produces a <u>customer service</u> star rating, ranking energy suppliers based on published criteria. In 2023 we changed the methodology and decided to make the ratings more accessible for our audience. We researched the behaviour of digital users to increase visibility in search engine results and designed new user journeys for those searching supplier names. We redesigned the presentation of data and tested the new approach with users, ready to be used in the next quarterly update. We anticipate the new star rating will be seen by many more consumers and have a higher impact in the energy market. This should drive competition amongst energy suppliers to score more highly, with a knock on benefit for the experience of consumers. From December 2023, Ofgem requires energy suppliers to display the star rating prominently on their websites, giving it even greater visibility.

The Extra Help Unit – supporting consumers in vulnerable situations

The Extra Help Unit (EHU), founded in 2008 and managed by Citizens Advice Scotland, delivers a statutory service supporting domestic and micro-business consumers in vulnerable situations with energy and postal complaints across Great Britain. This includes supporting energy consumers who are off supply or at risk of being off supply due to affordability, technical or customer service problems.

Licenced energy suppliers are obligated to have appropriate arrangements in place to manage EHU cases in a prompt and effective manner.

As energy prices have increased by an unprecedented amount, along with the cost of many other household essentials, the EHU has fulfilled a vital role in the last 2 years, supporting increasing numbers of consumers in vulnerable situations.



During 2023 the EHU progressed **30,000 Priority Complaints**where a consumer required **immediate support**, and over **6,000 standard Complaints** where the consumer needed the
Unit to **advocate on their behalf** due to their personal
circumstances or the complexity of the complaint.

Over £5,400,000 was secured in financial redress and a significant proportion of this was to help consumers remain on supply. This will also have a wider impact by reducing pressures on NHS and other key public services that are placed under greater pressure by the consequences of people living in cold homes and/or impacted negatively by lack of power.

Cases logged under **self-disconnection** categories, where a household was unable to top up their prepayment meter due to affordability problems, accounted for **72% of all cases** referred to the EHU in 2023 (almost **26,000** in total). The EHU **worked with energy suppliers** to ensure Additional Support.



Credit was provided when necessary, reviewing the debt repayment rate, and discussing the suitability of the prepayment meter and exploring other forms of support available. This included securing **vouchers from the Fuel Bank Foundation** and **supporting almost 400 people through our Additional Support Project Team** to maximise income, enabling consumers to continue their journey in a trusted environment.

The EHU engages with suppliers to improve policies and processes, as well as providing evidence and insight to the regulator Ofgem and policy teams within the Citizens Advice service. In the past year evidence was provided to Ofgem in relation to concerns about inappropriate fitting of prepayment meters for debt, the impact self-disconnection was having on vulnerable consumers and how suppliers were supporting these consumers in practice and also concerns about the customer service and complaint handling arrangements at specific suppliers, with one particular set of concerns leading to a compliance case being opened into OVO Energy.

As the EHU has grown and received more referrals from first tier advice providers including the Citizens Advice consumer service, steps have been taken to evolve how the service operates, including:

- Development and introduction of an online supplier portal to give energy companies a live view of key data and the status of their EHU cases.
- Continued development of the Scottish Government funded Civ Tech Project, working with Helpfirst to develop a solution for identifying and prioritising casework, delivering further safeguards to consumers, and protecting staff well-being. <u>More here</u>.
- EHU secured the British Standard 18477 in inclusive service provision; identifying and responding to vulnerability.

The EHU continues to receive extremely positive feedback from the independent customer service satisfaction survey conducted by Accent. On average during 2023:



95% of consumers surveyed said they were **satisfied or very satisfied** with the quality of service provided



82% felt **less stressed** after EHU support



85% felt the EHU had helped them **find a way forward**



79% felt more confident in **dealing** with future issues

The comments provided by the service's clients during the survey also highlight the positive impacts the EHU has achieved:

"At the time I was very scared and frightened, alone, and isolated all improved or resolved following EHU engagement." "They really cared about me until the end. Overall I couldn't believe that they got the job sorted."

"They went extra lengths without judgement - it was such a caring manner as it's hard to ask for help - so it was lovely not to be judged."

Making a difference

Some examples of our work in 2023/24

Our work is carefully designed to identify and solve the practical problems that consumers face in different markets. To give a flavour of the impact it can have, here are some examples of recent projects that have made a difference.

New prepayment meter protections

Our Out of the cold? and Kept in the dark reports in late 2022 and early 2023 revealed a rise in forced prepayment meter installations and warned of the hardship many were facing, including showing the scale of people being disconnected from their energy supply. We used this evidence to call for enhanced protections for prepayment customers, to prevent self-disconnection and avoid inappropriate forced installations and remote switches. Our data and insight also showed the need for substantial reform in debt pathways and streamlined contact procedures.

Since then, new regulations have come into force requiring energy suppliers to follow stricter rules before force-fitting a prepayment meter. We have worked with Ofgem and other stakeholders to define and enhance consumer protections through the new rules, which came into force from November 2023.

Modelling commissioned by Ofgem projects that the new rules will reduce excess winter deaths among vulnerable people by roughly 4%, delivering expected health benefits of at least £328m. And industry-wide improvements on debt pathways and ease of contact will help to provide a stronger safety net for consumers, helping to prevent the recurrence of some of the challenges we saw in 2022.

In Autumn 2023, we partnered with Energy UK and Ofgem to develop the Winter Voluntary Debt Commitments. Together with Energy UK and its members, we launched the Speak, Seek, Save campaign to ensure people know how to seek help if they're struggling to afford their energy bills.

Constructive engagement with suppliers has also seen some companies go further than the licence requirements in providing support for their more vulnerable customers this winter, including debt write-offs and bespoke support for people who are struggling to pay their bills.

Energy Price Cap

The expertise required to engage with policy issues also allows us to scrutinise detailed proposals. For example, we identified that the Energy Price Cap was applying some data that was only relevant for non-prepayment consumers to all consumers. Ofgem then amended its methodology.

In total, we calculate that the current retail price cap is around £2.50/household lower due to our direct interventions, compared to the cost of our energy advocacy levy funding, which is around £0.08/per household in 2023/24.

\subseteq

Successfully advocating for Ofcom to keep the cap on second class letters

Letters are an essential service which allows consumers to connect with Government, financial services, businesses and loved ones. Our research shows 25 million people in Great Britain send at least 1 letter a month.

Royal Mail has made it clear it wants to get rid of the price cap for second class letters. But the price of a first class stamp is now almost 100% more than it cost just 5 years ago, increasing 3 times more quickly than second class stamps. Without the cap, consumers might have been hit by similar hikes for second class post.

By raising our evidence with the regulator and with stakeholders across the sector, we have campaigned to keep the second class safeguard cap. The regulator has now proposed the cap will stay in place for the next five years, protecting affordable access to postal services for consumers.



Helping to deliver energy flexibility

For domestic energy flexibility to make a meaningful role in achieving net zero, it's estimated that 3.7 million households must be flexible on a regular basis at times of peak demand by 2035. That will require time-of-use tariffs and smart appliances to be made accessible and appealing to more people.

Since 2019, we've built the case for regulations in the flexibility market. In our market <u>risk register</u>, first published in 2019 and updated in 2022, we identified protection gaps. In <u>Smartening up</u> we shared research exploring what people need to feel confident about the flexibility market and in <u>A flexible future</u> we unpacked the barriers faced by particular household groups. The government rightly <u>recognises</u> that it needs to support people with barriers to taking part in and benefiting from energy flexibility. We continue to call for a clear plan for how this will be achieved, focusing on 3 main outcomes: better information, appropriate regulation and inclusive innovation.

In 2023, the Energy Act passed and included powers to regulate companies providing energy flexibility. We continue to work closely with government policy teams to help shape the content of the regulations, ensuring they are designed to improve consumer confidence and fill protection gaps.



Fairer pricing for mobile and broadband consumers

In September 2022, we called out the £2.5 billion set to be added to mobile and broadband bills in 2023 as a result of inflation-linked hikes to contract prices. In April 2023 Ofcom launched a review into the use of inflation-linked in-contract price rises - its first since 2013.

In October 2023 we published a detailed report looking at different types of price rise terms in telco contracts: Dialling up prices: Why mobile and broadband consumers need better protections from unfair pricing practices. It identified that £1.4 billion was set to be added to consumer bills as a result of another round of price hikes in 2024. Our report highlighted that consumers strongly prefer fixed prices in mobile and broadband contracts to help with budgeting and financial planning.



New best practice for smart meter in home displays

After identifying that more people were experiencing problems with broken in home displays (IHDs) for smart meters, we worked with the Government's smart meter programme to create new best practice. This will help ensure more households will be able to get a replacement IHD in future. With the growing availability of time of use tariffs and trials, this will help ensure more households know how much energy they are using and when.



Network price control CMA appeals

As part of our work to ensure net zero infrastructure represents value for money, we provided extensive scrutiny of the new price controls arrangements for electricity distribution companies.

One of the network companies, Northern Powergrid, chose to make a technical appeal of the outcome to the CMA, seeking to claim an additional £157m from consumers. We intervened on behalf of consumers and used our expertise to provide analysis and insight, which is of value to both CMA and Ofgem as they have made their decisions. In particular, we have sought to translate the regulatory framework into real work impacts, including on consumers. The outcome is that Northern Powergrid will receive only a fraction of their claim (£42m).



Calling for an end to drip-pricing

In July 2023 we published <u>Pushed to Purchase: Counting the cost of deceptive digital design in e-commerce</u>, which explored the cost to consumers from design decisions. This report found that 1 in 6 consumers had bought something they did not want, need or later regretted due to the design of an app or website. Of this number, 25% reported that they had spent more on an item than they wanted because a product was originally advertised as cheaper. This can sometimes be the result of drip-pricing, and we used this report to recommend that the government add drip-pricing to the list of banned practices within the new Digital Markets, Competition and Consumers Bill. Our previous report, <u>Tricks of the Trade</u>, identified that consumers can pay more for products and services, and it also has a negative impact on competition.

In September 2023, the Government launched a consultation on pricing transparency, which included several questions related to drip-pricing. Our response set out a suggested framework for how legislators and firms can respond to challenges around determining what is a genuine additional add-on and what features should be incorporated in headline fees. We will continue to engage with key stakeholders on this issue, to ensure that consumer experience is centred in discussions.

4

Ensuring that consumer interests are central to REMA

The Review of Electricity Market Arrangements (REMA) is the most comprehensive set of changes to the wholesale electricity market in a decade. These reforms will change how our electricity system works, and could deliver significant benefits to consumers if done correctly.

We published <u>It's All About Location</u> and <u>Splitting Opinion</u>, exploring how these significant reforms in the energy market might affect consumers. In addition, we worked with DESNZ and Sustainability First to set up an End User Forum ensuring the interests of consumers, fuel poverty and environmental groups were factored into the decision-making process for REMA.

Exploring the benefits of hydrogen for home heating

28 million homes will need to move to low-carbon heating by 2050. While increasing evidence supports the widespread use of electric heat pumps, there is significant debate about the role of hydrogen for heat.

Our <u>Heat GB</u> report was first-of-its kind research, exploring the costs of changing gas and electricity infrastructure to enable these technologies. It also highlighted how decisions to rule out options can be made earlier than the planned date of 2026, providing clarity to millions of consumers and the energy industry.



Holding Royal Mail to account on poor quality of service

Consumers should be able to expect a reliable and efficient letter delivery service. Letter delays affect even those who aren't regular post users themselves, as many organisations and institutions communicate by post.

Royal Mail has failed to meet its delivery targets under the USO in 4 out of the last 5 years. In the first half of this year, Royal Mail didn't hit the target in a single postcode area. From missed bills and legal documents, to benefit decisions and hospital appointments, this causes harm to consumers.

Our research revealed almost 1 in 3 were hit by delays last summer, and 7.3 million experienced negative consequences as a result. Our findings also revealed that the impact of these delays didn't fall proportionately across the population. People of colour were nearly twice as likely (23%) to experience negative consequences as a result of letter delays compared to white respondents (13%). Similarly, 21% of disabled people experienced negative consequences as a result of letter delays, compared to 13% of non-disabled people.

We used our extensive evidence on this issue to inform the Department for Business and Trade Select Committee inquiry into Royal Mail, which resulted in recommendations for the regulator to investigate year-on-year de-prioritisation of letters and take into account insight from postal workers.

Protecting survivors of domestic abuse from address disclosure

In 2019 we published our report, 'On the receiving end', looking at the impact that post exclusion had on survivors of domestic abuse. As part of this report, we uncovered extensive harm caused by agencies disclosing survivors' addresses to perpetrators, putting their safety at risk. We also found that, for half of survivors, fear of their address being disclosed was putting them off even engaging with agencies in the first place - leaving them without access to key services.

Our recommendation was for the Information Commissioner's Office (ICO) to investigate address disclosures specifically relating to domestic abuse, in an attempt to protect survivors from having their details revealed by various agencies. This year we're pleased to see that the ICO has begun investigations into 7 companies accused of doing just that, and will consider fines if they've found to have breached data protection laws.

Representing energy consumers in the policy development process

Energy policy is developed in a range of different arenas and it is essential that the consumer voice is represented. To give a sense of the breadth and depth of where we represent consumers interests, here are just some of the working groups, taskforces and panels we expect to participate in in the year ahead. This is not an exhaustive list, and we expect it to evolve during the year in line with policy developments.

Fuel poverty

Welsh Government Fuel Poverty Advisory Panel NEA Cymru: Fuel Poverty Coalition

Retail market standards

Energy UK Expert panel and stakeholder panel for Vulnerability Commitment Energy UK Compliance Panel for Switch Guarantee

Smart homes

Open Energy: Modernising Energy data Access Advisory group

Smart and Secure Electricity System (SSES) Industry Advisory Group

SSES Energy Smart Appliances (ESA) technical working group

HOMEFlex Code working group

Smart and Fair? Advisory Board

Codes

Balancing and Settlement Code (BSC)
Panel

Uniform Network Code (UNC) Panel

Smart Energy Code (SEC) Panel

SEC Change Board

Connection and Use of System Code (CUSC) Panel

Retail Energy Code (REC) Performance Assurance and Change Panel Boards

Smart Energy Strategic Working Group

We are also engaging with Energy Code Governance Reform to ensure consumer interests are central to the future operation of codes

Representing energy consumers in the policy development process

Smart metering

Smart Metering Delivery Group (SMDG)

Smart Metering Operations Group (SMOG)

Consumer Reference Group (CRG)

Consolidated Metering Code of Practice (CoMCoP)

Observer on Smart Energy GB Board

Net Zero / Future of heat

Future Homes Standard Implementation Board (and co-chair of Consumer Implementation Group)

BSI Net Zero Strategic Advisory Group

DESNZ Heat Networks Stakeholder Group

Heat Trust Committee

Future of Gas Steering Group

Renewable Energy Consumer Code Advisory Board

Gas Goes Green Review Group

DESNZ electrification of heat group

Sustainable Homes & Buildings Coalition Working Group

Social Housing Decarbonisation Fund Consultative Panel

Better networks

REMA End-user Challenge Panel

REMA Strategic Advisory Panel

Electricity System Operator RIIO Stakeholder Group

Electricity System Operator Performance Panel

Electricity Networks Association Open Networks Challenge Group

Resilience as a Service Advisory Group

Connections Reform Steering Group

Ofgem Connections Delivery Board

Marketwide Half Hourly Settlement Programme Steering Group

Capacity Market Advisory Group#

E3C Electricity and Gas Resilience Interactions Task Group

RIIO-3

Cross-sector policy group

GD3- Gas Distribution Working Group

GT3- Gas Transmission Working Group

ET3 - Electricity Transmission Working Group

RIIO-GD2

Vulnerability and Carbon Monoxide Allowance Steering Group

Planned expenditure 2024-25

We requested an ongoing increase of £1,806,400 in 2024/25. Nearly 50% of this increase is the funding required to enable us to prepare to take on our new statutory advice and advocacy responsibilities for consumers on heat networks.

The majority of the remaining increase will enable us to permanently expand our energy staffing to reflect the growing demands for our specialist input and expertise.

A small proportion of the overall increase will enable us to continue investing in improving the quality and reach of our digital energy advice, which is already reaching over 5.5 million users a year.

The total energy funding is equivalent to approximately 11p per GB household.

Our postal budget is an increase of 0.9% on 23/24, which reflects a real terms reduction.

The specific allocations in this work plan are necessarily provisional, and subject to change if we have to adapt our work in response to external developments during the year.

Core Consumer Advocacy Budget for 2024/25

	Staff and related costs	Programme	Total
Energy	£5,182,000	£539,000	£5,721,000
Post	£972,000	£120,000	£1,092,000
Cross-sector	£765,000	£138,000	£903,000
Directorate	£207,000	£0	£207,000
Total			£7,923,000

This budget reflects funding allocated by the Department for Business and Trade (DBT) to advocate for consumers in England and Wales. We will also receive a further £260,400 in funding from Consumer Scotland to ensure we are able to reflect the interests of Scottish consumers in GB-wide decision-making. This would take our total 2024/25 advocacy budget to £8,183,400.

Planned expenditure 2024-25

In addition to our core consumer advocacy work in energy, in 2024/25, we're also pleased to oversee the Energy Outreach Programme (formerly known as the Big Energy Saving Network) and Energy Savers Campaign.

We are requesting the same amount of funding as the previous year.

The total funding is equivalent to approximately 5p per GB household.²

Core Consumer Advocacy Budget for 2024/25

	Programme	Total
Energy advice programmes	£2,871,400	£2,871,400

² Energy cost per household based on the approximate contribution made by household energy consumers only (by volume). Non domestic consumers also contribute towards the levy.

Citizens Advice helps people find a way forward.

We provide free, confidential and independent advice to help people overcome their problems. We're a voice for our clients and consumers on the issues that matter to them.

We value diversity, champion equality, and challenge discrimination and harassment.

We're here for everyone.

citizensadvice.org.uk







© Citizens Advice

Citizens Advice is an operating name of The National Association of Citizens Advice Bureaux. Registered charity number 279057.