

Citizens Advice Consumer Work-plan 2018/19: Summary of responses



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Summary

This year we received a total of 62 responses to our draft work plan. This is 11 more than the 51 responses we received last year, and 37 more than we received in 2016/17. Overall, we have classified the responses as broadly:

- Positive: 56
- Neutral: 3
- Mixed: 2
- Critical: 1

We received responses from a broad range of stakeholders including MPs, regulators, industry, charities, interest groups and unions and a parish council.

The vast majority (56) of responses expressed overall support for our plans. Respondents particularly recognised the need to ensure that consumer rights are protected in rapidly changing essential markets. They also valued our strong focus on ensuring that essential services are accessible to, and meeting the needs of, vulnerable consumers. For example, Rachel Reeves MP said “I very much support Citizens Advice looking across different sectors to identify where improvements can be made for consumers, and the priorities set out in the draft work plan to help vulnerable consumers in particular.”

Three respondents asked questions or made suggestions on specific projects without offering any overall opinion, while 2 offered an even mix of support and challenge. Only 1 respondent was critical of our plans overall. Where we received negative feedback, it primarily centred on the level of ambition set out in the plan. For example, the 1 overall negative response (from Royal Mail) argued that our planned work on the postal market was *disproportionately high* compared to the level of detriment in the market. Other stakeholders felt that our plans were *not ambitious enough* in some areas.

We also received valuable feedback on how the focus and objectives of particular projects could be amended slightly to maximise their value and impact. A number of respondents also highlighted areas where they felt their organisation could contribute knowledge and expertise as we progress our work throughout the year.

We welcome all feedback - positive, negative and neutral - as a valuable part of developing our work. We have carefully considered and weighed up all of the feedback we have received, and made a number of changes to our final work plan as a result. This document summarises the feedback we received for each project and our response.

1. Strengthening consumer rights in a changing world

1.1 Secure the best Brexit deal for consumers

Cross-sector: We received several direct responses on this project. Overall there was good support for it, with the CMA stating that 'Citizens Advice is right to try to use the leverage of its unique and trusted brand to ensure the needs of consumers are fully understood and taken into account in the design of the future consumer protection regime for the UK.'

The ESAN Chair highlighted that, in order to secure a new settlement for consumer rights and protections in Brexit, business will be representing its interests so the consumer voice should be heard too.

Citizens Advice Scotland (CAS) expressed interest in understanding more about the consumer principles being developed to test the final Brexit agreement against.

The CMA stated that they would welcome a mention of the Consumer Protection Partnership (CPP) in the work plan, and its importance in helping to coordinate the collective efforts of some of the key players in the consumer landscape to maximise benefits for UK consumers. They went on to highlight opportunities for Citizens Advice to feed in our views through the CPP and other fora about the likely impact of Brexit on consumers, on current consumer protection legislation, and future cross-border co-operation.

We agreed that it is important for the consumer interest to be as strongly represented as business interests. We agreed that we should mention the importance of the Consumer Protection Partnership, particularly in relation to Brexit.

Energy: Five respondents mentioned support for our energy work around Brexit. BEUC - the European consumer organisation - was particularly keen we continue to engage on the EU clean energy package.

Post: Four stakeholders commented specifically on our postal work plans around Brexit. All of these responses were positive. Royal Mail welcomed our flexible, advocacy based approach and committed to keeping us informed of any developments in their own advocacy work around Brexit.

Three respondents encouraged us to look at specific areas of impact for UK consumers. ACRE highlighted the need to focus on the implications for those living in rural areas, while CCNI drew attention to the specific challenges facing Northern Ireland. What Next 4 U suggested we look at the ramifications of Brexit for cooperation between Royal Mail and its EU counterparts.

We welcome this feedback and will take these specific areas into account when carrying out our work around Brexit.

1.2 Ensure consumers are comfortable with how their smart data is used - Energy

Six respondents expressed particular support for our work focusing on ensuring consumers are comfortable with how their smart data is used.

Two electricity distribution companies - Northern Powergrid and Electricity North West - were keen to emphasise the consumer benefits that smart data could deliver but both supported our research in this area. The Committee on Fuel Poverty requested that we cover attitudes to the use of smart data for helping access energy efficiency measures support.

The proposed new privacy framework will cover all uses of smart data. We will ensure our input into this process covers consumer attitudes to it being used for energy efficiency support and have clarified this in the work plan. We are also participating in Sustainability First's 'Privacy Interest Advisory Group on smart meter data' which is considering this issue in detail.

1.3 Understand the impact of potential changes to the Universal Service Obligation - Post

Twelve respondents commented on this project. Ten were positive, one neutral and one negative.

Of the positive responses, four suggested areas it would particularly helpful for us to focus on. For example, DEFRA and the Countryside Alliance highlighted the potential detriment that changes to the USO could bring to consumers and businesses in rural areas. Age UK suggested we look at the potential impacts of any potential changes for older consumers reliant on post as a vital means of social communication and accessing government and medical services. What Next 4 U suggested that we include the impact of digitalisation as a factor driving changes to the USO. We welcome all suggestions and will look to incorporate these areas when planning our work in the year ahead.

Another stakeholder felt that this project is long overdue, as the current USO is probably no longer appropriate. The Mail Competition Forum welcomed our focus on potential changes to the USO, but would not support any conclusions calling for an extension of the USO as currently configured. Royal Mail recognised our desire to understand the impacts of changes to the USO, but emphasised that there is no immediate threat and that any work in this area should be proportionate.

The CWU were critical of this project and argued that we should not carry out work focussing on the sustainability of the USO in 2018/19. Their criticism centered on the nature and timing of this project in light of the current security of the USO. They also disagreed with our assessment of Royal Mail's financial position, and did not think that comparisons with developments in Denmark and Finland were apt in light of the different market conditions in these countries.

We recognise that Royal Mail's financial position has improved in recent months. We also acknowledge there are differences between the Danish and Finnish postal markets and the UK's. However, it is still valuable to understand how other countries have approached the challenge of maintaining the USO in light of increasing digitalisation and declining letter volumes and understand the impact of any changes on consumers in these countries. It should be noted that the reference to these countries in our work plan does not reflect an endorsement or a repudiation of their approaches.

We agree that there is no risk to the USO in the short term, as concluded by Ofcom in its 2017 review and as reflected in the commitment of the Government to the current USO. We have changed the wording to make this explicit in the text of the work plan. However, we believe there is still value in exploring potential impacts of changes to the USO now, in light of the continued downward trend in mail volumes as well as concerns expressed by other stakeholders and discussions already taking place at the EU level.

1.4 Build the future energy market around consumers - Energy

Eleven responses included specific support for our work on building the future energy market around consumers. In particular they expressed interest in our work on time of use tariffs and supplier hub model.

We received offers of collaboration on this project from Action with Communities in Rural England (ACRE) Energy Systems Catapult and EDF while the Committee on Fuel Poverty suggested that we work closely with the Energy Networks Association and the UK Energy Research Centre.

The National Association of Disabled Staff Networks (NADSN) would like us to set out how energy firms should support disabled people to access cost effective

technology that will reduce overall energy costs. Ofgem asked for more clarity on our proposed framework for deciding which time of use tariffs will work for which consumers.

We will continue to engage a range of stakeholders in our research. Given the broad scope of this project, talking to other organisations with specific expertise will be essential to its success. The needs of disabled customers will be an important consideration in ensuring all consumers can benefit from the changes in the energy market.

1.5 Help flexible regulation to drive improvements in service - Energy

Four respondents expressed particular support for our work in this area. One respondent, Industrial & Commercial Shippers & Suppliers (ICoSS), highlighted some problems with principle-based regulation but did not oppose our proposed work to help it drive improvements.

Energy UK expressed a desire that we review the format in which complaints data is presented.

We will continue to work closely with Ofgem and other parties to ensure that consumers benefit from transparent and accessible information about supplier performance on customer service, including complaints handling.

1.6 Ensure that new market entrants put consumers first - Energy

We received 12 responses in support of our work on new market entrants. ICoSS urged against putting up barriers to market entry while EDF wanted to ensure that regulation of heat networks was proportionate and allowed for reasonable returns but neither disputed our role in this area.

The Committee on Fuel Poverty said that an assessment of the link between fuel poverty and heat networks would be helpful.

The suggestion that we consider understanding the connection between fuel poverty and heat networks is welcome, and we will consider how best to incorporate this into our work in 2018/19.

1.7 Push for a parcels market that works for consumers - Post

We received 14 responses commenting on our planned work on the parcels market. Twelve were positive, one neutral and one negative.

Several respondents commented on the increasing importance of alternative delivery solutions such as lockers and click and collect services and welcomed further investigation in this area. The Rural Services Network was also keen to understand whether rural consumers have fewer options for alternative delivery and welcomed further investigation into whether and how the needs and preferences of rural consumers differ from those of urban consumers.

Post Office Limited highlighted the importance of the Post Office network in sending and receiving parcels. The National Federation of SubPostmasters welcomed research exploring consumer perspectives on, and behaviour when using, PUDO points and whether this has any effect on their views or use of Post Office branches.

CAS and CCNI agreed that it is important for consumers to be able to navigate the C2X market effectively and access appropriate products at the best price and welcomed research in this area given the expansion of the marketplace in recent years. CAS additionally highlighted the need for small businesses to understand their rights and obligations especially given recent findings that 36% of Scottish SMEs are likely to send parcels and packets on a regular basis. Royal Mail does not support the commissioning of new research into this market segment.

Two other respondents specifically mentioned the role of parcel brokers in regards to service quality and mail integrity. We welcome this feedback and have retained this project in the work plan with minor adjustments to clarify the scope and nature of commissioned research into the C2X market segment.

1.8 Understand how fluctuating incomes and billing practices interact - Cross-sector

CCWater highlighted that the issue affects water consumers as well as energy consumers. They suggested that, whilst there are current systems in place to address this issue in water, working together could improve approaches in both water and energy.

Keep Me Posted stated their belief in the importance of consumers having access to paper bills and statements, in order to effectively manage and

understand their financial affairs, especially when they are less straightforward.

We are keen to learn lessons from both the water and postal markets in seeing how this can be addressed. We are particularly mindful of the importance of notifications to many consumers.

1.9 Ensure consumers have access to redress, resolution and automatic compensation

Cross-sector: CCWater said that access to redress schemes should be given and industries should evidence compliance with EU ADR Directive where applicable. They also welcomed the possibility to compare water industry with other sectors to see what lessons can be learned and improve customer service across industries.

Keep Me Posted asked Citizens Advice to consider the impact of paper bills and statements when consumers attempt to access the relevant information for redress, resolution and automatic compensation.

We agreed it was important to consider both as part of our ongoing work on consumer redress.

Energy: Five respondents from the energy industry commented on this work, four of these gave explicit support. Northern Powergrid (along with UK Power Networks) outlined their view that the compensation system for electricity distribution works well as a whole as unpaid compensation is returned to all consumers with a 20% uplift.

We have clarified our description of the compensation system for electricity distribution in the work plan.

Post: We received 6 responses in relation to our plan to consider whether existing requirements on postal services providers to publish data on the volume and nature of the consumer complaints they receive are sufficient. Three of these were positive, two were negative and one was neutral.

CCNI and CAS agreed the complaints landscape is complex for consumers to navigate, and information on the volume and nature of complaints in the parcels market is limited. This makes it difficult to identify particular areas of consumer detriment in the postal industry. The NFSP welcomed this project and pointed out that the local Post Office is often the first port of call when something goes wrong, giving them valuable insight to contribute to the project.

Another respondent agreed that parcel operators should be required to publish more information on the complaints they receive, but questioned the timing of the project. Ofcom's 2016 Review of Regulation considered this issue and concluded that no change was needed, and is unlikely to revisit this decision until 2022. One respondent argued that the project was not necessary as existing consumer protections in the post market are 'extensive and sufficient.'

After reflecting on this feedback we have decided to retain this project in our work plan, but adjust the focus. We no longer intend to look at whether existing requirements on postal operators to publish information on the complaints they receive are sufficient. We will instead focus on how insights from alternative sources of complaints data, including social media, can be harnessed and utilised to greatest effect by regulators, policy makers, consumer groups and industry.

1.10 Ensure consumers can effectively opt-out of marketing mail - Post

We received 5 responses to our plan to ensure that marketing mail opt-out procedures are transparent and consumers have a consistent method of making their preferences known. Two of these responses were positive, one was neutral and two were negative.

Royal Mail were happy to work with us to identify possible improvements to current opt-out mechanisms. Whilst Age UK welcomed the development of the Mail Preference Service (MPS) in a similar vein to the Telephone Preference Service (TPS), they pointed out that opting out of marketing mail would not protect vulnerable people from fraudsters using postal scams such as fake lotteries and prize draws. The CWU also pointed out the social importance of direct mail and the vital revenue source it provides for Royal Mail.

In light of this feedback we have decided to remove this project from our 2018/19 work plan. Although it is important that consumers can express their preference to not receive marketing mail, the introduction of the General Data Protection Regulation in May 2018 may make this more straightforward. We will keep a watching brief on this issue and return to it in future if necessary.

2. Ensure major projects and infrastructure investment deliver good value for consumers

2.1 Advocate for fairer energy network costs for all consumers - Energy

We received nine expressions of support for our proposed work on energy network costs. Four electricity distribution companies disputed our previous analysis on network costs. However two nonetheless explicitly supported our role in this area while the other two did not dispute it.

2.2 Make sure consumers get value for money from other monopoly services - Cross-sector

CCWater stated that they are happy to share their extensive experience of actions that have made a difference in making sure the consumer voice is heard in price control discussions. They shared a report so we could see their recommendations in ensuring companies are financed efficiently, and will provide us with a copy of an upcoming report identifying where companies are outperforming their regulatory allowance. They further welcomed collaborative work which could help achieve a good outcome for the upcoming 2019 price review, but also more effective regulation that protects consumers.

We welcome this offer and will review CCWater's commissioned report with interest.

2.3 Help scrutinise the hidden costs of energy - Energy

We received nine responses in total, eight of which expressed their support for our work in this area. The Committee on Fuel Poverty would like an assessment of the impact of these hidden costs on fuel poverty. They made the point that the burden of these costs will be greater for those who rely on electric heating. SSE Networks also made this point.

We know that previous work has been done on the distributional impact of the way these extra costs are charged. We will remain mindful of these issues as we conduct our analysis and make our own contribution to this debate.

2.4 Ensuring consumer access to a high-quality Post Office network - Post.

We received 14 responses to our plans to ensure consumers have access to a high-quality Post Office network - 9 were positive, 1 was negative and 4 were neutral.

Our plans to monitor the number and location of post offices were broadly supported - the Rural Services Network (RSN), Countryside Alliance, DEFRA and Federation of Small Businesses (FSB) noted the relevance of this monitoring work - including temporary closures - given the importance of post offices to rural communities.

Some thought we should go further. The National Federation of Subpostmasters (NFSP) felt that we should explore in detail the social value of the Post Office network. The FSB said we should examine whether post offices could do more to support small businesses - particularly through an enhanced banking service offer.

Royal Mail felt that we should dedicate minimal resource to this work as the the Post Office Network Transformation Programme comes to an end in 2018. Post Office Ltd welcomed our proportionate approach to monitoring changes at an aggregate level.

In relation to our customer satisfaction plans several stakeholders - including Age UK and the NFSP - agreed on the importance of taking particular account of vulnerable consumer groups at high risk of detriment. Royal Mail stated that any assessment of Post Office service standards should be limited to post-related services, and along with Post Office Ltd felt that our 2017 Post Office Locals Review renders this work unnecessary.

We welcome this feedback and have retained this project in the work plan with minor adjustments to clarify the scope. For example, we set out more explicitly that we will take particular account of older, rural and small business consumers of Post Office services in this work. We have also clarified that our customer satisfaction research is intended to be a representative and longitudinal assessment. As the consumer advocate, it is important that we undertake independent, robust and transparent evaluation of customer experience to ensure the post office network is meeting consumers' needs - particularly those at high risk of detriment. There is no current public industry data that meets these criteria.

2.5 Keep the smart meter roll-out focused on consumers - Energy

We received ten responses related to this workstream. Nine expressed support while ICoSS outlined their view that an alternative technology would be more suitable for small businesses but did not dispute our role in this area. ACRE asked for a focus on problems with the technology for people in rural areas while SSE asked us to consider the impact of the roll-out deadline on consumer outcomes.

Through our monitoring function we will remain vigilant for people experiencing communication problems with their smart meter, particularly those in rural areas. We will also continue to work to ensure that consumer experiences of the smart rollout are fed into the ongoing development of the smart meter implementation programme, and this includes any issues that may arise from pressures due to timescales.

2.6 Ensure accessible and deliverable energy efficiency policy - Energy

We received five responses related to our work on energy efficiency policy. Three offered support for our work, NEA wanted to see more detail on how we can support government to meet its fuel poverty targets while the Committee on Fuel Poverty were keen that we engage with them and their recommendations for this policy area.

Through our work outlined in this section and in section 4.1 we will maintain a strong focus on ensuring those that are struggling with their energy bills get help to reduce their costs. We will of course engage regularly with the Committee on Fuel Poverty and their recommendations will be the starting point as we consider how this can best be achieved.

3. Reformed markets that do not exploit consumers' behaviour

3.1 Establish the costs of the loyalty penalty - Cross-sector

We had just one response that specifically referenced this project. CCWater stated that they are happy to share research and complaints data which may be of use in establishing costs of loyalty penalty.

3.2 Fix the loyalty penalty - Cross-sector

John Penrose MP acknowledged that consumers are often penalised for showing loyalty to service providers. He noted that this is bad for competition and consumer choice as well as having a disproportionate effect on the most vulnerable people. The response agreed with the cross-sector approach to our work in this area.

We welcomed the support for this project and will consider any implications for regulatory harmonisation it might have.

3.3 Protect against excessive energy prices - Energy

Seven respondents offered their explicit support for our work on energy prices. Three suppliers outlined their opposition to price caps in general but none disputed our role in this area. The Committee on Fuel Poverty said it would be helpful if we could consider the impact of interventions in the market on fuel poverty.

The impact of interventions on those least able to pay will be the most important factor in our evaluation. However we will wait to see what analysis the government includes in their fuel poverty statistical release for the most comprehensive picture of the impact on fuel poverty.

3.4 Help consumers switch energy supplier - Energy

Eight respondents gave particular support to our proposed work in helping people switch supplier. Two respondents queried whether funding for Big Energy Saving Network would still be available to local delivery partners. NEA asked for a greater focus on helping renters. Age UK asked for particular focus on the barriers for elderly people.

We will continue to work with local partners to deliver the Big Energy Saving Network. Addressing the barriers to switching faced by renters and elderly

people has remained a top priority in both our advocacy and advice and will continue to do so.

3.5 Assess the impact of big data, pricing algorithms and personalised pricing - Cross-sector

Whilst no respondents offered suggestions of change or improvement for this project, they indicated support and were positive about this being a focus.

3.6 Improve outcomes for people with mental health problems - Cross-sector

No responses specifically referenced this project.

4. Protecting and empowering vulnerable consumers

4.1 Preventing crisis situations

Energy: Seven respondents referred to this area of our work - five of them expressed support for it. Two others made suggestions - the Committee on Fuel Poverty asked that we engage with them on how to target support at low income high cost households while NEA stated that anyone being moved onto Fuel Direct should be referred for debt advice. EDF expressed support but asked us to look at whether Fuel Direct could be reintroduced as a method of ongoing payment.

Ofgem urged us to continue engaging with suppliers on how they can support people who are self-disconnecting, particularly those with smart meters.

The opportunities that smart prepay services offer will be an important focus of our engagement with suppliers about how they are supporting people who are self-disconnecting. We will consider the current issues with the Fuel Direct process as part of our work in preventing crisis situations.

Cross-sector: Keep Me Posted suggested a proven solution to avoid a crisis situation - in terms of money management - is to receive paper bills and statements. They stated that the use of paper bills and statements to effectively manage financial affairs has been proven by their research to assist consumers in managing their financial affairs and therefore avoid a crisis situation.

AgeUK asked that this project does not simply look at those who are not paying their utility bills. They stressed that older consumers who are barely heating their homes, or who are managing to heat their homes and pay their bills because they are cutting back in other essential expenditure, must also be recorded and represented in this research.

We agreed with AgeUK that it is important to reflect on the consumer experience holistically and would seek to ensure that our workstream reflects the other severe impacts on low income & older households. By looking specifically at how to support credit customers who are struggling to keep up with their bills we intend to capture those who are continuing to pay but whose budgets are under severe pressure.

4.2 Drive improvements in service - Energy

Nine respondents made specific reference to our proposed work on driving improvements in service for vulnerable consumers, all expressed their support for it. Ofgem noted the importance of the indicator for the new vulnerability principle while Energy UK welcomed our input to their proposed work in this area.

4.3 Ensure vulnerable people are not disadvantaged when accessing postal services - Post

We received 16 responses to our plan to ensure vulnerable people have parity of access to postal services. Ten of these were positive and 6 were neutral.

The Department for Environment, Food & Rural Affairs (DEFRA) noted that they 'especially welcome' our plan to 'review existing data to understand how changes to the post office network have impacted on rural consumers'. Action with Communities in Rural England (ACRE) and UK Government Investments (UKGI) also welcomed this focus. ACRE offered to work in partnership with us in this area.

Two stakeholders noted the importance of monitoring vulnerable people's access to banking services - particularly in rural areas. Age UK highlighted the 'increasing importance' of our work looking at the accessibility of post offices 'against a backdrop of bank closures and digitisation'. We recognise this increasing importance but note that we are not able to conduct research on access banking services at post offices as part of our levy-funded work. We will, however, be submitting a bid for additional funding for research in this area in the coming months.

Two stakeholders questioned whether our understanding of 'vulnerable consumers' is too tightly defined. The Communication Workers Union (CWU) highlighted the importance of identifying the impact of post office closures in inner-cities, as well as rural areas. The Communications Consumer Panel (CCP) noted that 'it is not clear' what we intend to do to 'identify consumers needing more support in the postal market'.

We welcome this feedback and note the importance of having a detailed understanding of which consumers are most likely to be vulnerable in the postal services market. We have amended the work plan to reflect this. We will work with other organisations and stakeholders to develop our understanding of

vulnerability in relation to post and postal services - including looking at intersectionality - to ensure we advocate effectively for all vulnerable consumers.

4.4 Ensure access to post for those with no permanent address - Post

We received nine responses to our plan to work on homeless people's access to post, all of which were positive.

The overall message from respondents was that this is a worthwhile project, on an area of real detriment, that requires further research. Four respondents argued that the rise in homelessness across the UK made this a particularly important time to conduct research in this area.

We received responses from three homelessness charities: Crisis, Shelter and St. Mungo's. These responses were all supportive and reaffirmed that the inability to access post was a significant barrier for homeless people.

Crisis said: 'We're not aware of research that has looked into this issue before, and we expect that the work could provide valuable insights to make policy and practice recommendations. Due to the barriers that homeless people face accessing post, and the corresponding detriment missing post can have on vulnerable groups, we would support the issue being explored further.'

We also received a positive response from Tom Brake MP who said:

'For homeless people the lack of a fixed abode presents a significant barrier to them receiving post, and hence accessing services. Homelessness includes those sleeping rough and those moving between temporary accommodation. I see the problems this causes in my constituency and I believe that it is important for Citizens Advice to carry out research on this issue.'

We have therefore retained this project in our final work plan.

4.5 Increase the uptake of Freepost - Post

We received 3 responses to our plan to increase the uptake of Freepost, all of which were positive.

Citizens Advice Scotland said that this project was well-complemented by our proposal to ensure people without an address have access to the post.

Royal Mail said they support our aims to educate consumers to use their services effectively. They did however note that they did not think this workstream required significant new research.

We have therefore kept this project in our work plan but made small changes to the wording. The changes make it clear why research is necessary, whilst emphasising that the research will be tightly focussed and not involve substantial external spend.

4.6 Improve identification of vulnerable consumers - Cross-sector

CCWater suggested future collaboration and sharing of information in order to deliver improved results for consumers. They also suggested specific events such as Big Energy Saving Week as a good example of where advice on water efficacy and affordability support can be shared.

We also had one negative response to this project. Royal Mail questioned whether we should be looking into this area as stated in our work plan proposal without clear supportive evidence. They noted that the work plan states, "A longstanding issue in supporting to vulnerable consumers is the difficulty providers face in identifying people who need extra support, particularly in energy and postal markets." They argue that we have not provided the evidence to support this and therefore question the research is proportionate to the risk of customer detriment.

Keep Me Posted was especially encouraging of this project and expressed interest in discussing any relevant findings from our planned work, to ensure that vulnerable people are not disadvantaged when accessing communications services.

The Communications Consumer Panel (CCP) / ACOD suggested that Citizens Advice should engage with other providers of consumer information in essential services, particularly where vulnerable consumers are concerned. They suggested that Citizens Advice needs to work with companies so that providers themselves – especially their customer relations staff - can identify vulnerability rather than simply waiting for customers themselves to highlight this.

We received four expressions of support for our proposed tool to help vulnerable consumers tell their utility companies about their circumstances. One supplier, EDF, raised concerns that it would deprive them of contact with their customers. SSE expressed interest in the project and a willingness to learn more about it. The other supplier to comment, Npower, expressed support for it.

We will pursue all opportunities to work collaboratively and share data in order to improve the consumer experience of vulnerable people.

We have considered Royal Mail's view that there is not significant detriment to justify research. Our focus is informed both by the problems we know consumers face when coming to the Citizens Advice service with. We also build on the findings of the National Audit Office's review of vulnerable consumers in regulated industries, which identified data sharing as a key barrier.¹ While the focus will be on service industries, we think it is still useful to include the postal market within the scope of the research. We have made adjustments to the framing to make clearer what research questions we will consider.

It is our view that the proposed tool will increase opportunities for suppliers to engage with their customers. It will persuade many consumers to communicate with their utility companies who might not otherwise have done so by providing a trusted gateway to the services they offer. Once suppliers have received this new information about their customer, they are able to contact them directly to discuss what additional support might be needed. However we will work closely with suppliers as our plans for this tool develop.

¹ [Vulnerable consumers in regulated industries](#), National Audit Office

Annex A: Post summary

We received 36 responses to our work plan.² Overall they were broadly:

- Supportive: 31
- Neutral: 2
- Mixed: 2
- Critical: 1

Thirty one respondents were supportive overall of our proposals. The Countryside Alliance described our plan as “comprehensive and spot on” and Tesco said it was “absolutely fantastic” for consumers. These respondents particularly supported the 4 key themes we set out. On post offices, Jonathan Edwards MP said “It is important that the consumer experience of post offices is monitored regularly and independently.” On vulnerable consumers, the Welsh Government said, “We are especially supportive of the work you intend to do on the needs of vulnerable customers.” On Regulation, Age UK raised concerns about the USO, saying “it is important that we maintain reasonable alternative options for older consumers who are not online.” And on parcels, the Communications Consumer Panel said “We welcome Citizens Advice’s research to inform recommendations for improvements within the parcels market.”

Our business as usual work was also highlighted by some. For example, ACRE said it “attends and appreciates the role of the Post Office Advisory Group” and the House of Commons Library welcomed our monthly newsletters as “extremely useful.”

Two responses were mixed. The CWU raised “a number of concerns”, particularly around the USO and marketing mail. But it also recognised our “fantastic contribution... facilitating discussions between stakeholders from across the sector,” and called on us to broaden the scope of our post office and vulnerable

² The respondents were ACRE, Age UK, Antelope Consulting, APC Overnight, Apex, CAS, CCNI, Communications Consumer Panel, Countryside Alliance, Cringleford Parish Council, Crisis, CWU, Defra, Derek Osborn/What Next 4 U, DX, FSB, House of Commons Library, IMRG, Jonathan Edwards MP, Keep me posted, Mail Competition Forum, NASDN, National Federation of Women's Institutes, NFSP, Ofcom, Post Office Ltd, Roger Darlington, Royal Mail, Rural Services Network, Shelter, St Mungo's, Tesco, Tom Brake MP, UKGI, Unite, Welsh Government

consumer work. The Mail Competition Forum said it would “question the need to consider changes to current consumer redress options” but was supportive of proposals on the USO and asked us to look more closely at mail pricing.

Two respondents were neutral. Unite commented on the lack of “reference to the Cross Border Parcels debate that the European Parliament is having.”

One respondent was negative. Royal Mail’s main comments were that the work plan should be proportionate to detriment in the postal sector and that it should be more transparent on costs for each project. It said, “The low levels of consumer detriment in the postal sector do not justify the high levels of activity being proposed. Citizens Advice does not appear to be applying its own principles in assessing each of the projects proposed in this work plan.”

Annex B: Energy summary

We received a total of 29 responses³ relating to our energy work.

We have classified these responses as broadly:

- Positive: 28
- Neutral: 1
- Mixed: 0
- Critical: 0

One was a query from a local delivery partner on our plans for the switching programmes. The other 28 all expressed support in general for the energy policy work we have proposed for the coming year.

Our proposed focus on the changing energy market was particularly well received with 18 respondents offering particular support for our work on either the future market or new entrants.

The campaign group Keep Me Posted mentioned the need to maintain paper bills for energy consumers throughout their response to our projects. We will continue to push suppliers to offer a broad range of communication channels to suit their customers' needs.

There were some areas where industry disagreed with our approach to energy policy such as price caps and network profits, however none disputed our plans to continue looking at these issues. Other than that, there was wide-ranging support for our energy activity, with most suggestions being for further things we could consider within our proposed projects. There were also many invitations to collaborate and work closer together which we welcome.

³ ACRE, Age UK, BEUC, Centrica, CFU, CMA, Committee on Fuel Poverty, Consumer Council of Northern Ireland, EDF, Electricity North West, Energy Systems Catapult, Energy UK, E.on, Essential Services Access Network (ESAN), Footprint Trust, Industrial & Commercial Shippers & Suppliers (ICoSS), Keep Me Posted, NEA, Northern Powergrid, Npower, Octopus, Ofgem, Smart Energy GB, SSE (business, domestic, networks), National Association of Disabled Staff Networks (NADSN), UK Power Networks

Annex C: Cross-sector summary

We received 13 cross-sector responses⁴ to the CPS work plan this year.

The responses for the cross sector projects were broadly:

- Positive: 12
- Neutral: 0
- Mixed: 0
- Critical: 1

Stakeholder responses to the cross-sector work plan were overwhelmingly positive, welcoming our proposed areas of focus. Positive responses highlighted the value of our research and insights on consumer experience, with a particular appreciation of the considerations of vulnerable consumers. A couple of respondents stated that our unique and trusted brand will have a clear and important role in upcoming decisions.

Most of the stakeholders welcomed our collaboration in various forthcoming projects and, more generally, also cited instances where they believed they had valuable insight and research to be shared with us.

We received one negative response from Royal Mail which questioned our general approach to deciding what cross-sector projects are the most important, suggesting that they aren't necessarily proportionate to the level of detriment or based on evidence.

⁴Age UK, Keep Me Posted, Consumer Council for Water (CCWater), Royal Mail, Roger Darlington, Citizens Advice Scotland (CAS), Competition and Markets Authority (CMA), Consumer Council for Northern Ireland (CCNI), Ofcom, Communications Consumer Panel - Ofcom's Advisory Committee on Older and Disabled People (CCP - ACOD), Rachel Reeves MP, John Penrose MP, Yvonne Fovargue MP

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Action with Communities in Rural England
Age UK
Antelope Consulting
APC Overnight
Apex
Department for Business, Energy and Industrial Strategy Committee on Fuel Poverty
Catapult Energy Systems
Centrica
Citizens Advice Scotland
Communications Consumer Panel
Communications Worker Union
Competition and Markets Authority
Consumer Council for Northern Ireland
Consumer Council for Water
Countryside Alliance
Cringleford Parish Council
Crisis
Department for Environment, Food and Rural Affairs
DX
EDF
Electricity North West
Energy UK
Eon
Footprint Trust
House of Commons Library
Interactive Media in Retail Group (IMRG)
John Penrose MP
Jonathan Edwards MP
Keep Me posted
Mail Competition Forum
Middlesbrough Affordable Warmth Partnership
National Association of Disabled Staff Networks
National Energy Action
National Federation of SubPostmasters
National Federation of Women's Institutes
Northern Power Grid
NPower
Octopus Energy

Ofcom
Ofgem
Post Office Ltd.
Rachel Reeves MP
Roger Darlington
Royal Mail
Rural Services Network
Scottish and Southern Energy
Scottish and Southern Energy Networks
Scottish and Southern Energy Retail
Shelter
Smart Energy GB
St Mungo's
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The European Consumer Group (BEUC)
The Federation of Small Businesses
The Industrial & Commercial Shippers & Suppliers
Tom Brake MP
UK Government Investments
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