

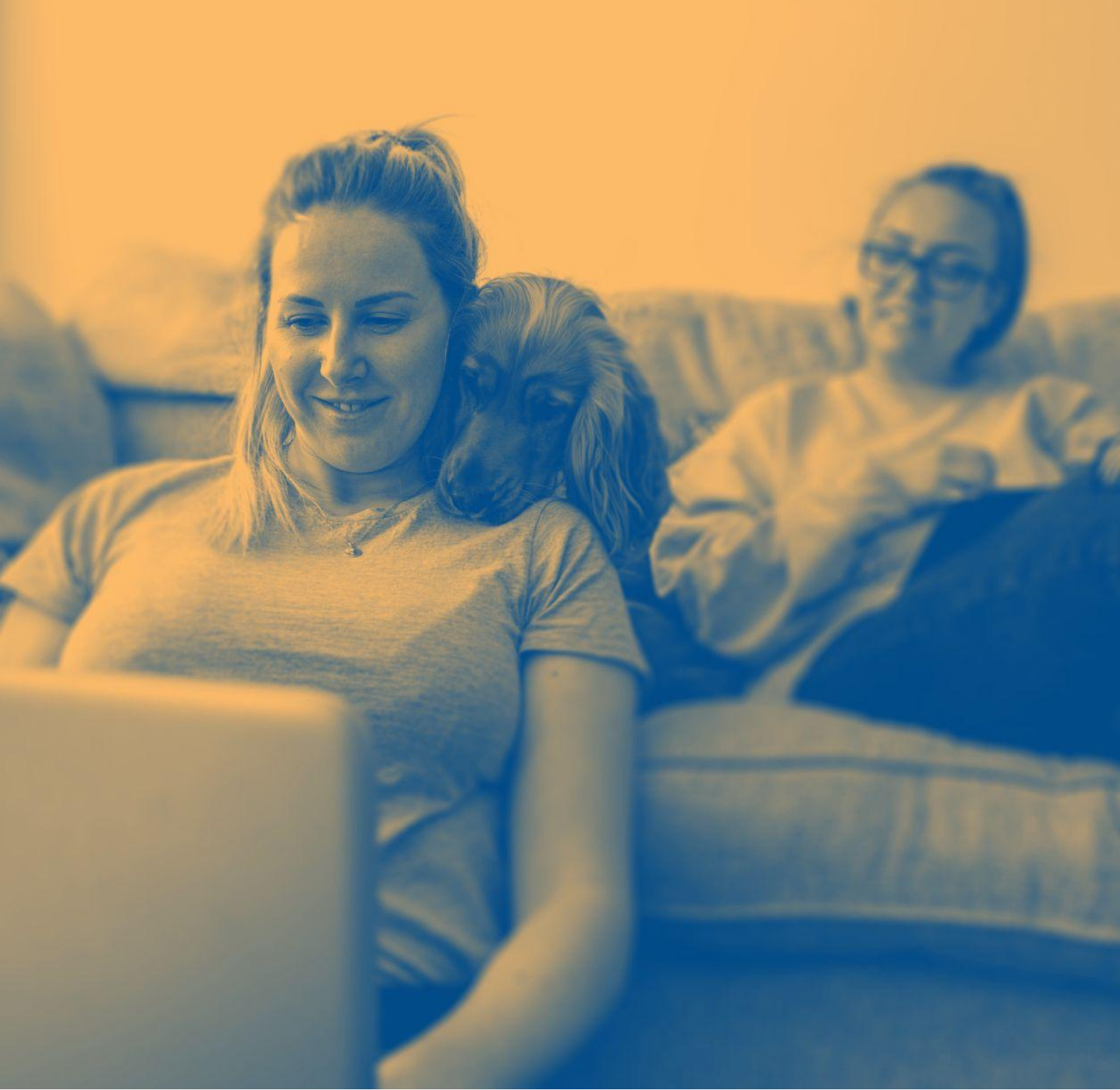


citizens
advice

Ask Once.

Consumer views on a Multi-Sector
Priority Services Register

May 2026



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Executive Summary

When essential services are interrupted, it is important for companies to identify consumers who need extra support, especially when there is a threat to life. For example, those who need constant access to electricity for medical devices or treatments, such as those on dialysis. The COVID crisis in 2020 - 2021 showed us how hard it was to ensure support was targeted to those who needed it. The Priority Services Register (PSR) in the Energy and Water sectors is supposed to ensure that vulnerable consumers are identified and receive extra support, such as battery packs or bottles of water.

Climate change is expected to increase the frequency and strength of unpredictable extreme weather events, potentially causing more unplanned outages of essential services (power cuts, phone signal failures, or water outages). There will also be an increase in planned outages as we enter a decade of digitalisation (PSTN switch off), grid upgrades (Clean Power 2030) and potential decommissioning of parts of the gas grid. Across energy, water and telecoms, there are fundamental system changes that will benefit consumers but, in the short term, increase the risk of severe harm to specific groups of people.

An effective PSR is a tool which can be used to keep vulnerable consumers safe. By identifying specific consumer vulnerabilities, companies will be able to provide targeted help, both in day-to-day interactions (such as offering translated bills and password services) and during life-threatening outages (such as providing batteries and welfare checks). Currently, there are over 45 individually held PSRs across Energy and Water¹. Each company duplicates efforts to find those most at risk. Already, data sharing between energy and water has led to significant increases in the number of consumers on water PSRs. The more data that is shared across essential services, the less likely a consumer in vulnerable circumstances is to fall through the cracks.

In January 2027, analogue phone lines will cease to work, as we move to a digitised system. The Public Switched Telephone Network (PSTN) switch-off means that during a power cut, consumers without a charged mobile phone will have little means of communication to ask for help. There is, therefore, an increasingly high risk of consumer detriment if support can't reach those who need it, because consumers' support needs, such as people relying on medical equipment at home, are not known across industries. This context makes it more essential than ever for government, regulators and companies to come together to build on existing efforts and make an improved, and multisector, PSR a reality.



The concept behind a Multi-Sector Priority Service Register (Multi-Sector PSR) is a single version of the PSRs that operate across sectors, allowing consumers to register once to get help from all their essential utilities. Currently, a consumer has to disclose their support needs multiple times with each company in different sectors. With a Multi-Sector PSR, the consumer would be able to register once and their data would be shared with all their utility providers. This reduces the burden on consumers and would make it more likely that consumers receive the right support at the right time.

The current picture of PSRs is fragmented. Companies, regulators, charities, governments and consumer organisations have been advocating for a Multi-Sector PSR for over a decade, with successful trials proving the concept. However, the reality is that seamless data sharing, even in water and energy which have been able to share data since 2023, remains limited.

As the statutory advocate for energy consumers, with cross-sector knowledge of consumer and public services, we wanted to ensure that the consumer voice was not lost in the design of a Multi-Sector PSR. Every day at Citizens Advice, we see people come to us for help with navigating systems and asking for support. The Multi-Sector PSR is not only a way to make time-poor clients' lives easier by ensuring they only need to register once for a PSR, but also to save lives in an emergency. With the looming PSTN switch-off and several data-sharing systems ready for implementation, it was time for us to undertake this research.

Using a mixed-methods approach, we asked consumers how they feel about a Multi-Sector PSR, what their expectations of a Multi-Sector PSR are, and what an ideal Multi-Sector PSR would look like. We found broad consumer support for a Multi-Sector PSR, with 70% of survey respondents supporting its introduction, and strong qualitative findings that the government should take a leading role in ensuring a consumer-centric Multi-Sector PSR is enacted as quickly as possible. There is clear momentum for renewed collaboration among regulators, industry, and, most essentially, government to oversee a generational change for vulnerable consumers.



Key findings

1. Many people are unaware of the Priority Services Register (PSR) and are initially unsure what it does. Very few consumers (1.2%) spontaneously mentioned the PSR, and only 29% recognised the name. There is significant confusion regarding eligibility and the specific services offered. Consumers were able to accurately identify some services, but also included others that are not part of the PSR.
2. However, once the PSR was explained, consumers were supportive of the PSR. They felt it was important, especially in cases where there is a threat to life in an outage of an essential service, such as a power cut.
 - a. While consumers (particularly those facing cost-of-living pressures) wanted more financial support, they overall concluded that the PSR was not the right system for financial support.
3. Vulnerable consumers have a mixed experience of current support from essential services. There was a need for PSR or PSR-like services to communicate better with consumers. It was hard for consumers to know what they were entitled to and what good service looked like.
4. Consumers are very supportive of a Multi-Sector PSR in essential utilities namely energy (electricity and gas), water and telecommunications.
 - a. Energy and water are seen as core to a Multi-Sector PSR.
 - b. Telecoms was thought to be an important inclusion, especially in light of the PSTN switch-off and the growing importance of digital communication via broadband and mobile.
 - c. Consumers were worried about including financial services in a Multi-Sector PSR, due to lower trust in the financial sector and fears of data misuse.
 - d. Consumers felt that the Multi-Sector PSR should focus on 'threat to life' vulnerabilities, and should not include financial vulnerability.
5. Consumers want a Multi-Sector PSR that is consumer-centric, supports those who need it most, and is overseen by trusted parties.
 - a. Although many consumers thought the benefits of a Multi-Sector PSR outweigh the risks of data-sharing, there were concerns around the misuse of data and the need for oversight.



Policy Recommendations

1. The UK Government should commit to facilitating a Multi-Sector PSR in essential utilities (specifically Water, Energy and Telecommunications) for implementation by April 2028. This aligns with the start of the ED3 price control for electricity distribution, as well as timelines on water and energy data sharing.
 - a. Ofgem and Ofwat should oversee the enabling of seamless data sharing between the Water and Energy sector by April 2027.
 - b. Ofcom should work with Ofgem and Ofwat to prepare the water sector to implement a Multi-Sector PSR by April 2028.
 - c. There should be a consumer-facing element of the Multi-Sector PSR that allows consumers to access, edit, and control their data, either through suppliers or a standalone portal.
 - d. We recommend that a single government department takes on responsibility for delivering the Multi-Sector PSR, either The Cabinet Office, Department for Business and Trade (DBT) or Department for Science, Innovation and Technology (DSIT) would be well-placed to take responsibility for delivering the project.
2. The Multi-Sector PSR should primarily relate to 'threat to life events', ensuring those who need extra support during 'loss of supply' are supported
 - a. Communication needs (e.g. English as a second language) should be included, as in a loss of supply, being able to communicate effectively with a consumer is essential.
 - b. The design of the Multi-Sector PSR should not record financial vulnerability nor provide financial support. There are other pathways which are more appropriate for identifying financial need.
3. Essential utilities in Energy, Water and Telecommunications that are using the Multi-Sector PSR should focus on ensuring that high-risk, vulnerable consumers receive meaningful support and are protected from harm.
 - a. The Multi-Sector PSR should aim to capture all vulnerabilities; the focus should be on data depth rather than breadth to enable effective, targeted support for those most at risk during an outage.
 - b. Essential utilities should be required to check in periodically (for instance every 12 months) with those whose support needs have been shared through the existing PSR sharing system.



Policy Recommendations

4. To enable trust in a Multi-Sector PSR, the UK Government should create or empower an existing organisation to oversee data sharing in essential services to ensure consumer trust, access to data, and consumer redress².
 - a. This redress mechanism could be a data ombudsman, or similar organisation. It could have wider reach than the Multi-Sector PSR, enforcing standards for data-sharing across services.
5. To create the basis for a Multi-Sector PSR, regulators of essential utilities in Energy, Water and Telecommunications - Ofgem, Ofwat and Ofcom - should come together with industry and consumer organisations, including Citizens Advice, to align the classification of support needs and terminology across their sectors³.
 - a. Individual sectors should align their needs codes with oversight from their regulators and input from consumer organisations, to allow for sharing within their sector.
 - b. The alignment of classification of support needs and terminology should happen as soon as possible to mitigate risks from the PSTN switch-off in early 2027.
 - c. In the meantime, a category should be added to the Energy PSR needs code to identify people who are at risk of being unable to contact anyone during a power cut by February 2027.
6. Switching: The Energy sector should work to ensure that consumers only need to register once for PSRs within the Energy sector. We would put the emphasis on suppliers to ensure that they are not removing consumers from the PSR when the consumer is switching suppliers and staying in the same property. This should be resolved by January 2027.

The challenges of creating a Multi-Sector PSR require a new level of collaboration from essential utilities, government departments, regulators and consumer organisations. Clear government leadership will be needed to facilitate these steps, ensure a seamless journey for vulnerable consumers and protect those consumers from avoidable harm.



Research Methodology

In April 2025, we commissioned Blue Marble to conduct research into what the public considers an ideal Multi-Sector PSR. The research used both qualitative and quantitative methodologies, including a wide-ranging survey to gather experiences and perspectives from the general public. Qualitative fieldwork was more focused on those with PSR-eligible vulnerabilities, asking consumers to dive into the nuances of essential support services.

Quantitative fieldwork took place between 31st March and 30th April 2025. We carried out an online survey of 3,883 people as part of a nationally representative sample across GB (England, Wales, Scotland)⁴. We also conducted telephone interviews with 50 digitally excluded people across GB. This was to ensure that we were reaching a range of people with support needs who might not access services digitally, as a future Multi-Sector PSR system must work for all consumers.

Qualitative fieldwork took place from 7th April to 8th May 2025. All completed a mock PSR application to refresh their memories of the application stages. We interviewed 23 people on the PSR for at least one essential service with 2 telephone, 14 online, and 7 in-person interviews. The interviews examined how consumers became aware of the PSR, the application process, and their views on data sharing and the Multi-Sector PSR. We also carried out workshops with 23 people registered on the PSR. This was made up of 1 online group workshop and 3 in-person group workshops. To ensure regional representation, workshops took place in England, Wales and Scotland. Respondents were eligible for the PSR but had not signed up for one at the time of the workshops. Conversations covered: awareness of the PSR, perceptions of the application process, views on data sharing and what an ideal Multi-Sector PSR would look like.



What is a Priority Service Register?

The Priority Services Register (PSR) is a register held by energy (electricity and gas) companies and water companies of consumers who need extra support. The criteria for being on a PSR varies across sectors and companies, but usually include characteristics such as:

- Those of state pension age, who are pregnant or have young children, or who struggle with speaking or reading English.
- Living with a disability or a long-term medical condition, including mental health conditions, conditions affecting your sight, hearing or sense of smell, or conditions that mean you need to use medical equipment that requires a power supply.
- Some short-term circumstances, such as recovering from an injury or needing support after a stay in hospital, having been bereaved, or having lost your job⁵.

Energy (electricity and gas)

The PSR in the energy sector is set out in Condition 26 of the Supply Licence Conditions, Condition 10 of the Electricity Distribution Licence Conditions and Condition 17 of the Gas Transporter Licence Conditions. It is set out in the Utilities Act 2000 standard licence conditions⁶. Energy suppliers and gas and electricity distributors must maintain a 'Priority Services Register' of specific consumer needs. They must provide certain services to meet the needs of those groups, such as provision for incidents when supply is disrupted, meter readings, and accessible bills.

Water

Water companies must keep a register to offer services to consumers with specific needs. Some services they might offer are bills in accessible formats, more warnings of supply interruptions, safety passwords, and moving a consumer's meter. The water sector defines consumers in vulnerable circumstances as "people [who] do not have a reasonable opportunity to access and receive an inclusive service which may have a detrimental impact on their health, wellbeing or finances. This may be due to personal characteristics, their overall life situation or due to broader market and economic factors."⁷

Telecoms

Telecom sectors are not required to have a PSR, but companies do provide priority support to their customers during service disruptions through each company's priority fault repair service. This is available to users who depend on these services due to a disability and urgently need a repair.⁸ For example, under the BT Scheme you can apply if you, or someone who lives with you, are:

- Classed as disabled under the Equality Act 2010. You are considered disabled under this act if you have a physical or mental impairment that has a substantial and long-term negative effect on your ability to do normal daily activities.
- Incapacitated and therefore housebound, due to a chronic long-term illness or disability which prevents you from leaving the house without the assistance of another person.
- A severely sick child.⁹

To apply your application must be countersigned by a doctor or hospital consultant and must include a copy of their official stamp and full contact details. In other sectors consumers are able to self-report their circumstances.

Financial services

The financial services sector also has no specific requirement for a PSR. The Financial Conduct Authority (FCA) has instated a consumer duty, under which firms should act to deliver good outcomes for all customers, including those with characteristics of vulnerability¹⁰. This has led to firms taking proactive steps to identify vulnerable customers and offer appropriate support, such as “trusted person cards” for third-party access.¹¹

Vulnerability Model

There are two main models of a PSR: a needs code model and a vulnerable circumstance model. The needs code model focuses on what the consumer needs to access the service effectively; for example, a blind consumer might request communication in braille. A vulnerability model is when a consumer identifies as having a vulnerability, e.g. a mental health condition, and the organisation acts in the best interests of the consumer e.g. offering meter readings. In practice an organisation might operate a combination of both models, asking about vulnerable identities, and offering proactive help, as well as asking consumers if specific services would be appropriate. While the PSR is typically designed to offer non-financial support, some organisations have recommended flagging financial vulnerability on the PSR.





Consumer experiences of PSR(s)

Consumer experience of PSR(s)

Awareness of the PSR is low

Knowledge of support services for vulnerable consumers across essential services (energy, water, telecommunications and financial services) was very low. In our survey, consumers were asked what kind of support services they had received. Priority Services Registers in energy and water had very low visibility. Only 1.2% of respondents spontaneously mentioned the PSR when asked about what support was available to consumers. Just under a third of consumers, 29%, recognised the name 'Priority Services Register' when presented with different types of support available to people. When we asked people why they hadn't signed up to a PSR in energy or water, 38% of people cited not knowing about it.

Low awareness of the PSR means that vulnerable people risk missing out on essential help. We don't know the official number of people signed up to the PSR due to the fragmented system. In energy, electricity distribution networks report how many eligible consumers are signed up to the PSR, with estimates ranging between 58.1% (SSEN)¹² and 93.5% (UKPN).¹³

Uncertainty of what the PSR is

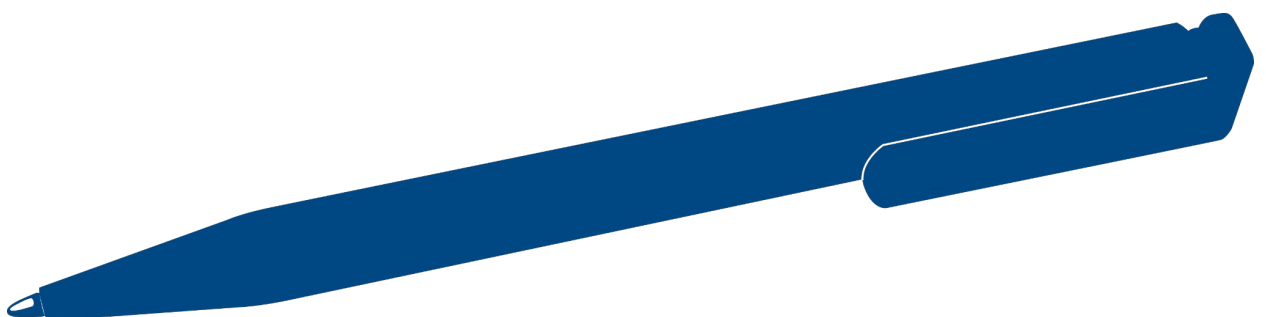
Consumers displayed limited knowledge regarding the support services available across different sectors. While they correctly identified some services, such as extra help during service disruptions, a major source of confusion was the lack of consistency between sectors.

For example, consumers correctly assumed that being on a Priority Services Register (PSR) in the energy or telecoms sectors could mean a quicker reconnection following an outage. However, this is not the case in the water sector, making it difficult for consumers to rely on intuition alone to understand their entitlements. Less intuitive services, such as the option to receive bills in different formats or 'nominated contact schemes' (where a trusted person, like a family member, is appointed to receive communications and bills), were notably less known or recognised by the consumers we interviewed.

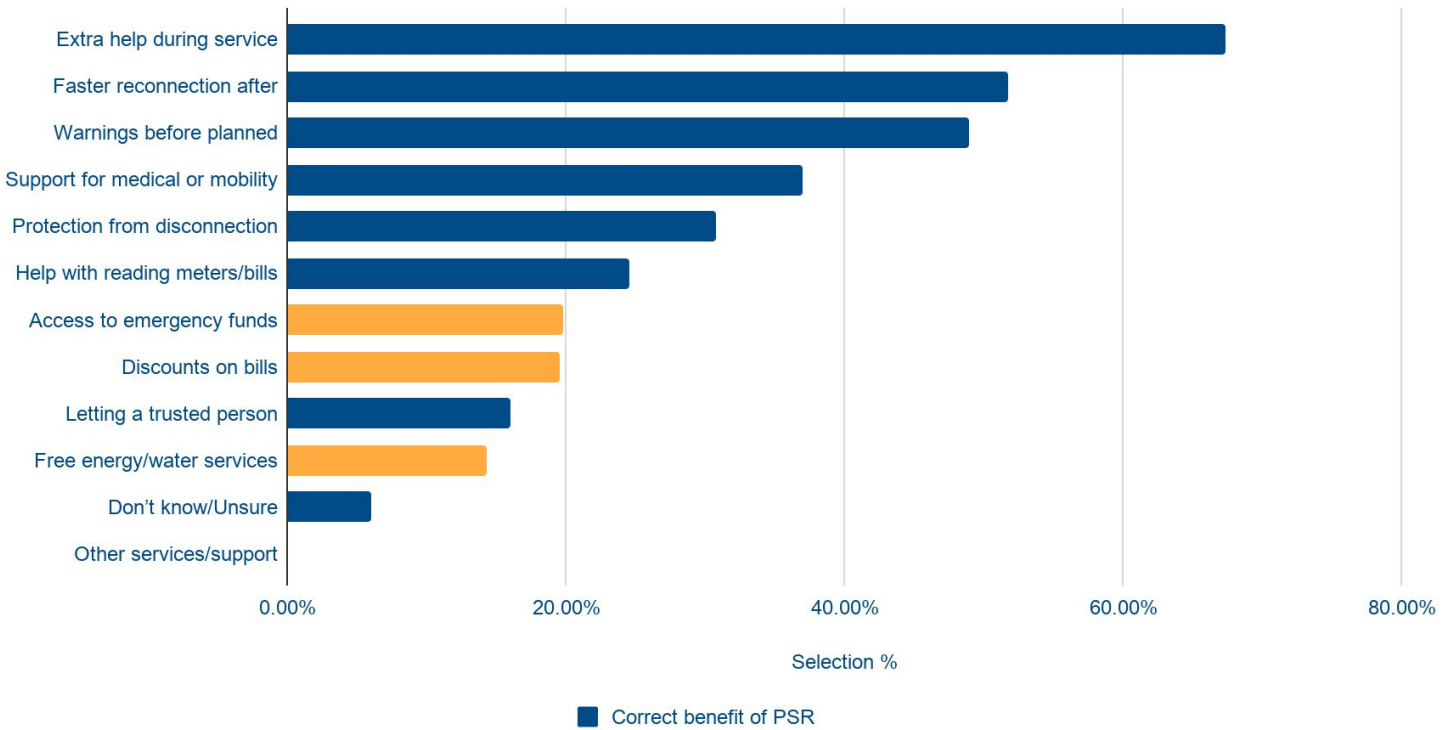
The lack of knowledge of what the PSR offers means that consumers are unable to ask for the help which they are entitled to, unless they get in touch about another issue. This was the case with many of those we interviewed. Often a consumer only found out about the PSR and the services included after calling their supplier about another issue, usually billing or debt. This customer journey may explain why many consumers have a common misconception that financial support is provided in the current PSR. 50% of people surveyed believed that the PSR offers financial support, such as discounts on bills or free energy and water services.

Uncertainty around eligibility for the PSR

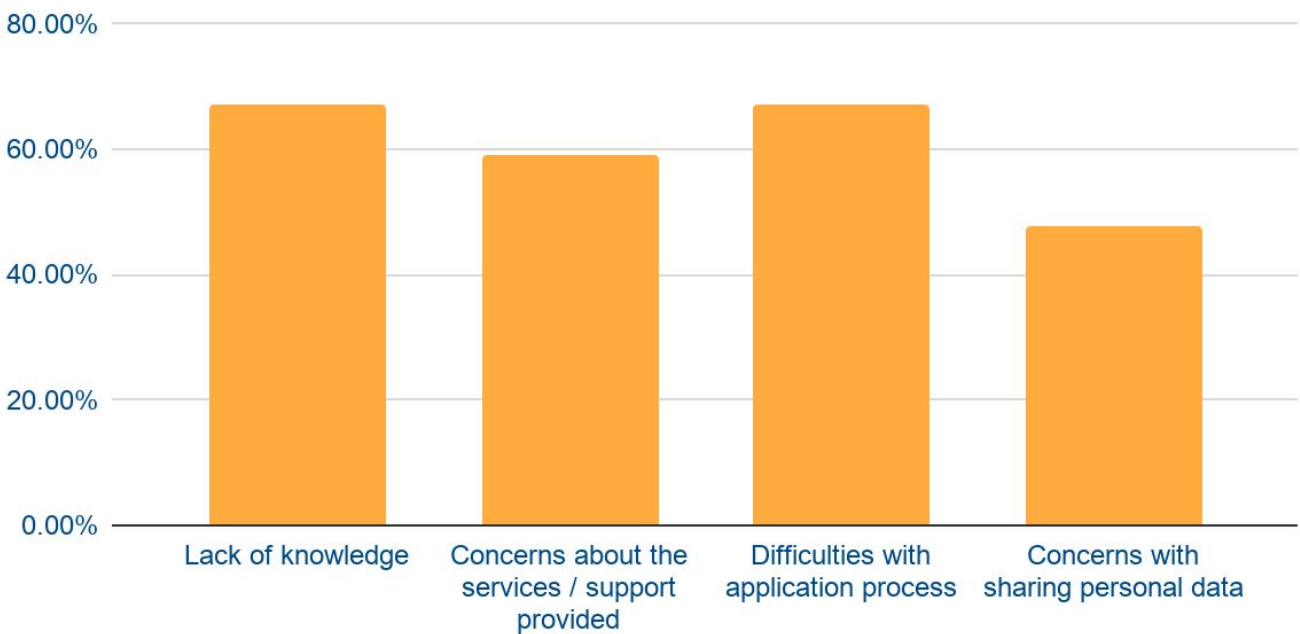
Only 2 in 5 people (40%) were able to correctly identify the PSR eligibility criteria. In our qualitative research, we also found that there was a fear among consumers that there were people more vulnerable than them who needed help, despite many of those consumers having PSR-eligible vulnerabilities. Consumers need clear guidance on who is eligible and reassurance that utilities will use the information to provide appropriate support. Without this guidance, consumers won't feel confident to apply, and this puts them at risk of missing out on essential support.



Which of the following do you believe are the benefits of the being on a Priority Service Register (PSR)?



What are the biggest challenges to applying for additional support/service?



Perception by demographics

Despite industry campaigns, awareness of the PSR is low across key demographic groups. Many focus group participants with disabilities were unaware of their eligibility. Though awareness of specific services, like the password service is low, participants saw the value of such support.

Age

There is a perception that the PSR service is only for very vulnerable and/or elderly customers. However, even those who are elderly or vulnerable - the people the scheme is designed for - don't know they are eligible. We found that fewer than half (46%) of over-65s thought they were eligible for the PSR, and only 37% of people in a household with a child under five believed they were eligible.

Disability

In our research, many participants with physical disabilities were unaware that they were eligible for the PSR. In the online group, two consumers noted they would be eligible under the medical criteria but were not currently signed up to the PSR. Medicine requiring refrigeration wasn't something the group had considered as a PSR support need until they participated in the research.

"I need to charge my cochlear implants every night, otherwise I can't use them, and I wouldn't be able to hear. So if there was a total power cut, that would be pretty detrimental [...] I wouldn't be able to hear anyone,"



Experiences on the PSR

To understand what an ideal Multi-Sector PSR would look like we needed to explore people's current experiences of the PSR in energy and water sectors, as well as similar support services in telecommunications. We plan to dive deeper into consumer experiences of the PSR in future research, building on the findings from this report. In this research we were interested in people's experience of non-financial support in the water, energy, telecommunications and financial services sectors. For those who had signed up to a PSR in energy and water, consumers cited that they like the idea of extra help in a power cut, faster reconnection after an interruption, and additional communication.

Satisfaction of support services generally

We found that consumers were generally satisfied with the support received from essential services. We found that 56% of people who had received support from their providers were satisfied with the support they received from companies like water and energy suppliers. 11% of people were dissatisfied with the support they received from companies. 32% of people were neither satisfied or dissatisfied with the support they received.

Younger people were more likely to be satisfied with the support they received from companies. 64% of people aged under 35 were satisfied, compared to 53% of people aged over 55.

People in a higher social grade were more likely to be satisfied with the support they received from companies. 60% of people in social grades ABC1 were satisfied, compared to 52% of people in social grades C2DE.

Experience of support in a crisis

Consumers reported varied experiences in water outages and power cuts with both positive and negative examples of support, or lack thereof, from water, energy and telecoms sectors. Even those consumers with positive experiences, such as frequent communication, also mentioned the negative impact of interruptions of supply. Negative experiences usually involve unmet expectations or a lack of communication.



Experiences of water PSR

Positive

One interviewee was impressed by the frequent communication during a water outage, they stated that the "PSR alerts were almost hourly, which was very helpful." But they also noted that the water outage had a massive impact; she had to go to a friend's house daily to shower, and use bottled water from collection points to run baths for her son.

Negative

One interviewee was recently affected by a supply incident. They expected to get bottled water, as it's difficult for them to visit the water stations. They were expecting a phone call from their water company to check in, but had no contact.

"I kind of thought the priority register was a bit pointless. It gives us the illusion that we're going to get extra support, but we actually don't." (Hannah, child under 5, Water PSR)

Experience of energy PSR

One interviewee was signed up to the energy PSR when they rang up about arrears; their gas debt was cancelled, and they received a device to check the meter from their house. They were assured by their supplier that they wouldn't be cut off from their electricity as they need the fridge to store their insulin.

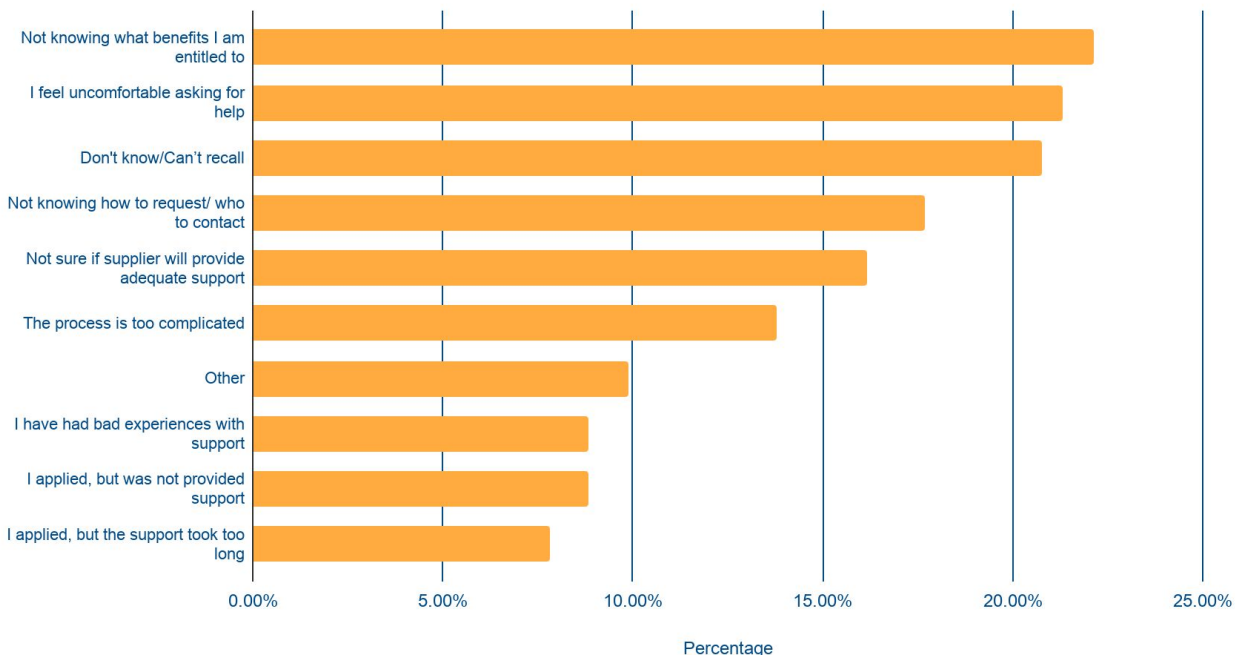
Experience of telecoms/broadband

One interviewee said they had received a hotspot device when the internet wasn't working, which they noted is useful if you work from home.

Asking for support

Most people don't know what they're entitled to, or feel uncomfortable asking for help. One interviewee mentioned that they "put pride aside" when contacting their utility provider, highlighting the struggle that consumers often feel when asking for help.

What are the main reasons you have not used these support services before?



Awareness of the support provider

There was widespread confusion about who might provide support in a power cut. 20% did not know there was a difference between suppliers and networks, and 70% of those who don't know the difference are actually eligible for the PSR. This is concerning because if consumers don't know who provides support in a power cut they won't know who to contact for that support. Furthermore, signing up via your energy network is the only way to stay on the PSR when you switch suppliers and remain in the same property.

While 58% of respondents attempted to name their network provider, the vast majority instead named their energy supplier. Only 13% of these respondents could correctly identify a gas distribution network (GDN) like Cadent, SGN, or Northern Gas Networks, and for electricity networks (distribution network operators/DNOs) it was lower at 8.5%. This lack of awareness supports our view that, while it is not necessarily for consumers to know the difference between suppliers and network providers, it is important for data sharing between suppliers and networks to be frictionless and consumer centric. Better data-sharing would go a way to solving this awareness problem, ensuring that whichever body a consumer has signed up to their data is shared with the relevant bodies and they receive appropriate support.

The move to a Multi-Sector PSR

Our research found that consumers were initially unsure of what the PSR was, who was responsible for it, and if they were eligible. The confusion surrounding the PSR is a major barrier to its success. Experiences of support from providers was generally good, with some examples of successful support in crisis, but we also found cases where consumers were not supported fully. There is more work to be done to improve the experience of the PSR. To solve many of these problems requires moving away from individual PSRs to a Multi-Sector Priority Services register. A tell-us once system would help clarify PSR services for consumers, and a simplified system would make it easier for essential services to raise awareness and provide support.





Consumer support for a Multi-Sector PSR

What is a Multi-Sector Priority Services Register (Multi-Sector PSR)

Since the mid-2010s, the water and energy sectors have begun sharing vulnerability data, recognising the benefits of a cross-sector approach. In 2023, the Department for Business & Trade (DBT) consulted on Smarter Regulation: Strengthening the economic regulation of the energy, water and telecoms sectors (as regulated by Ofgem, Ofwat and Ofcom) and stated: “A single multi-sector PSR service would ensure that consumers only need to disclose their vulnerability once, regardless of where they live”.

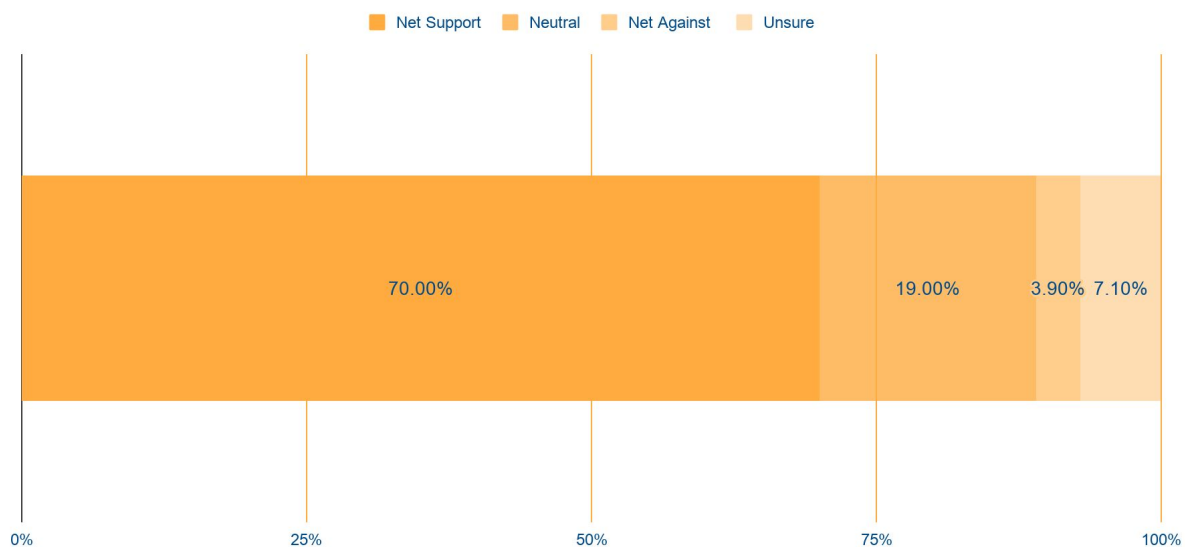
A Multi-Sector PSR could look like a single data hub or portal (hosted by either the private or public sector), which allows consumers to ‘report once’ their circumstances and the support they need. Service providers would then be able to access and update the information. DBT suggested that it should build on the work of energy and water, but eventually expand to include telecoms.

A missed opportunity?

If there were seamless data sharing between utilities, consumers would be more likely to register, taking pressure off companies and consumers. A vulnerable consumer who is already time-poor would not need to advocate for themselves multiple times, but having signed up, would be assured that all their utilities would be notified. Meanwhile, companies could work together to promote the PSR rather than chase the same consumers, saving utilities considerable time and expense.

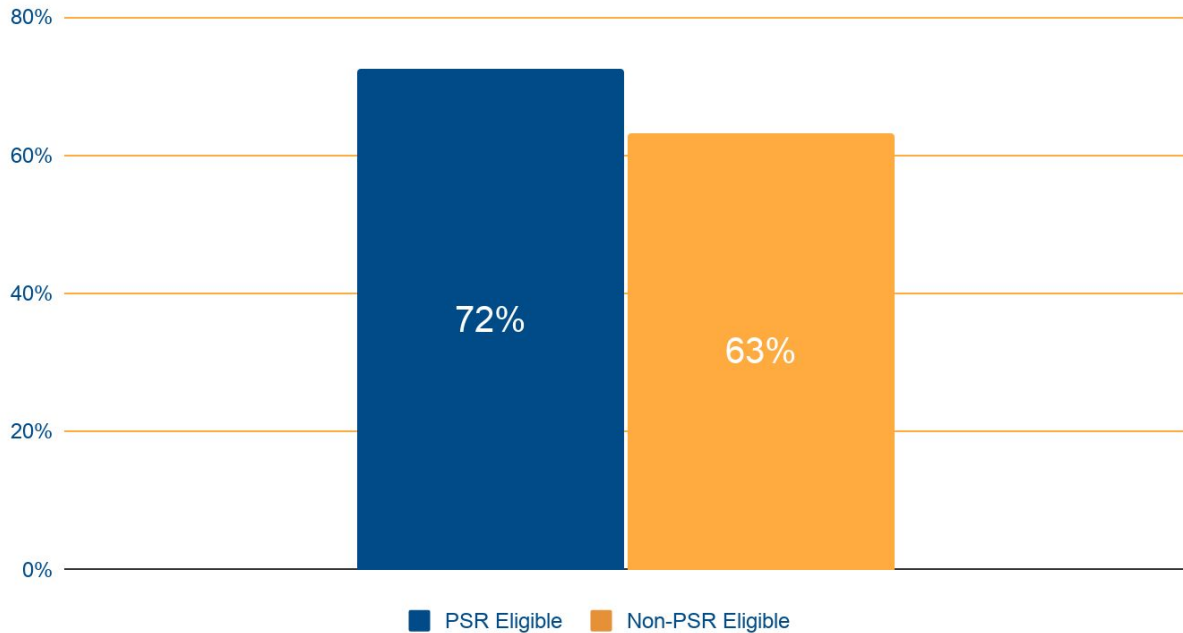
While a Multi-Sector PSR has been a supported idea across industry for a long time, at Citizens Advice, we were aware of a gap in knowledge around how consumers felt about a cross sector support system. To answer this question, we asked consumers in our survey whether they would support the introduction of a shared priority services register. We found broad consumer support for a Multi-Sector PSR, with 70% of survey respondents either strongly supporting (38%) or somewhat supporting (32%).

Support for MSPRS



People eligible for the PSR are more likely to support introducing a Multi-Sector PSR (72% vs 63%). It is important to listen to the views of those most likely to use the system, i.e. people who would be eligible for the Multi-Sector PSR. It also shows that the system would likely work better, as consumers wouldn't be afraid to share their data and sign up.

Support the introduction of an MSPSR



There were notable demographic differences in how people viewed the Multi-Sector PSR. For example, older people are more likely than younger people to support the introduction of a Multi-Sector PSR (76% for 55+ vs 63% for under 35). This is important again, as older people are more likely to be eligible for the Multi-Sector PSR. We also asked consumers in interviews and workshops how they felt about a Multi-Sector PSR.

Consumers liked that the Multi-Sector PSR would:

- **Minimise hassle and time pressures:** It would remove the cognitive burden of applying multiple times, and would be especially useful for those with health vulnerabilities. One focus group participant noted that “[The process of applying] can be a bit overwhelming. So, the less the better...”. By streamlining the application process, we could eliminate a stressful, but potentially life saving, administrative task that many consumers may fail to complete.
- **Remove a barrier to disclosing vulnerabilities:** Those we interviewed who are on the PSR highlighted how hard it can be to disclose personal information. People noted that there was an element of shame sometimes around asking for help or revealing personal health information. By removing the need to disclose many times, this lifts a weight off the shoulders of already overburdened consumers.

“It's just the fact that you're not having to give out your information more than once, especially for some people who don't like to discuss their disabilities”

- **Provide reassurance:** A Multi-Sector PSR ensures that people will receive appropriate support in an emergency situation. We found that 72% of consumers think the Multi-Sector PSR will improve emergency responses for vulnerable people. This is especially valued by rural and older consumers. “You would have reassurance that once you've registered with one thing, you've registered with everything.”.

Sectors to be included

We wanted to explore which sectors should be included in a share-once Multi-Sector PSR system. We started the research using the same premises as the DBT consultation: energy, water, telecommunications, and financial services. We found that there were strong consumer views on which sectors should be included, based on their perceived relevance and level of consumer trust. The interviewees noted that essential utilities - water, telecoms and energy - made sense to include in the Multi-Sector PSR, but were concerned about expanding beyond life-enabling services.

Water and Energy should be core to the offer

We found that consumers thought that energy and water should be the core of a Multi-Sector PSR. As one focus group participant encapsulated: "Warmth, heat, light, water, those ... are the essentials of life". They were concerned around expanding the PSR to too many sectors, saying "once you open that box, do you just keep adding things?".

Steps have already been taken in the energy and water sectors to share data seamlessly. Enabled by legislation such as the Data Protection Act 2018 in which the "substantial Public Interest" conditions allows the processing of sensitive data without explicit consent in specific scenarios, such as threat to life in a utility outage. Furthermore in 2023 we saw regulators, Ofgem and Ofwat, take an active step in encouraging data sharing between sectors.

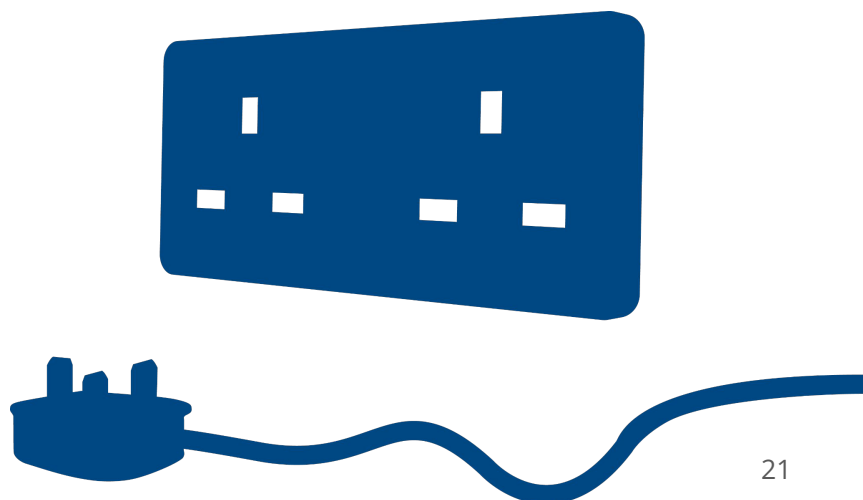
Very few people are currently aware that water and energy companies share PSR data. But, when told, many felt this was acceptable because it ensures vulnerable customers receive support as needed. Consumer support for this should serve as a catalyst to ensure work between energy and water continues at pace.

Telecoms in scope

Consumers thought that Telecoms should be included in a Multi-Sector PSR. People considered that, especially in the circumstances around the PSTN switch off in 2027, it would be essential for vulnerable people to have access to telephone and broadband. Customers see internet access as vital to daily life, particularly when applying for support such as Universal Credit.

Personal experiences of seeking support from telecom providers were poor, with people reporting being stuck on hold for prolonged periods. Some customers are keen for support to be improved by including telecoms in the Multi-Sector PSR.

Some suggestions from those who were digitally disadvantaged include showing people how to use technology and support around the landline switch off. Priority communications during disruptions are seen to be the most important support telecoms companies should provide.



PSTN switch-off

There was overwhelming concern among elderly participants about the move from analogue to digital phone systems in 2027. When discussing the possibility of losing power and the ability to communicate with emergency services, participants considered it extremely dangerous. “[The PSTN switch off] is going to affect a lot of elderly people who have had these telephone lines around for many years, and now I think they're going to feel quite overwhelmed.”

We recommend that a category should be added to the PSR needs code which identifies people who are likely to be without a means of remote communication, or at risk of communication blackout in a power cut, by February 2027. This would enable DNOs to prioritise reaching these customers at risk of communication blackout who are also vulnerable without power, by cross-comparing this code with other needs codes.

Financial Services should not be included at this point

Consumers demonstrated an overall lack of trust in banks and financial services. Many consumers showed lower trust in financial institutions to protect their data and use it sensitively. A few stated that they would be less likely to sign up to a Multi-Sector PSR if data sharing with banks and financial services was required. There were worries about what financial institutions would do with this information, for instance about “how it will affect people's credit scores and relationship with the bank”. Credit scores were a source of concern for consumers and there was a fear that their vulnerability could be used against them at a future stage. Many felt that the Multi-Sector PSR system needed to be kept separate from the financial services sector. However, some consumers on the PSR did note in their interviews that banking could do more for those with vulnerabilities, such as those who are digitally disadvantaged. It was felt that this could happen in tandem with a Multi-Sector PSR system.



Who should be on the Multi-Sector PSR?

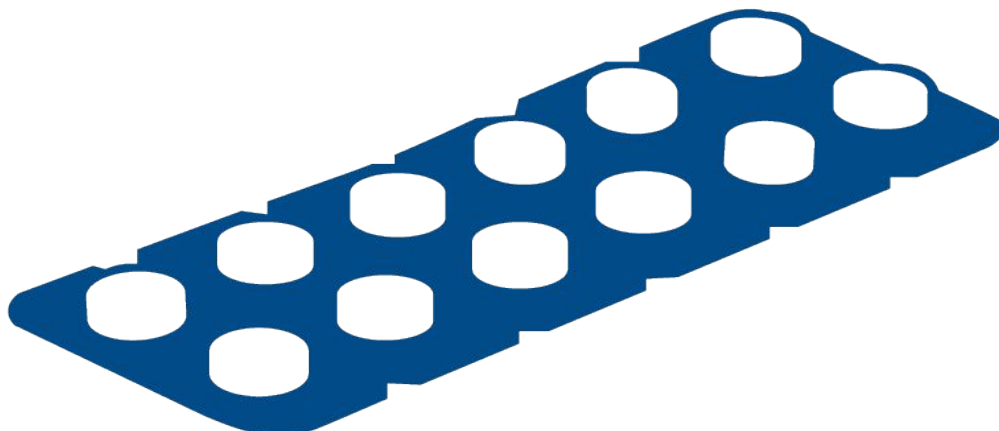
Consumers thought that people with medical vulnerabilities were most in need of support:

- Consumers agreed that people who rely on medical equipment are most in need of the type of support offered by the PSR.
- 82% of people believe that people with health conditions should be eligible for the PSR. Consumers thought that people with reduced mobility should be a particular priority.
- 70% of people believe that age should be considered in eligibility for the PSR, particularly people aged over 65.

There was some nervousness about having a very wide range of categories of people eligible for the PSR. In the online workshop, it was noted that “if you widen it to...all the conditions that you could possibly put there, the demands on this service might be so great that it becomes ineffective.” The England workshop was also concerned that if a large portion of the country were eligible, it would no longer be a priority service.

It is our understanding that much of the Multi-Sector PSR data sharing between sectors would be under the premise of a threat to life, as directed by the ICO. This would suggest that the data collected and shared should be with the aim of preventing any loss of life in a loss of service e.g. a power cut or gas outage. This must be the underlying logic of the categories on the PSR. Currently, we would not recommend changing the categories of the PSR as listed in the licence conditions, as they allow for either supporting those who are vulnerable in a loss of service or communicating with those who are vulnerable.

In the future, a two-tiered approach to the PSR could be considered, similar to the model being developed by the Utility Regulator in Northern Ireland, highlighting those of extreme vulnerability. This would be to ensure that utility companies are reaching and focusing on those with threat to life vulnerabilities as well as those with more general vulnerabilities. In the meantime, vulnerability must be assumed if a category is met, for example there might be those of a pensionable age that don't need extra support but it is difficult to know who they are under the current PSR system. As a workshop participant noted, “there are a lot of older people who don't want to ask for help. Some of the most vulnerable don't ask for help.”



The Multi-Sector PSR should not be the route to financial support

Views on the inclusion of financial vulnerability with the Multi-Sector PSR were nuanced. In the interviews and focus groups, many noted the cost-of-living crisis and that more support would be welcome. Financially vulnerable people were more likely to want financial support from companies as part of the Multi-Sector PSR. For example, 70% of financially vulnerable people wanted their energy companies to provide financial support as part of the Multi-Sector PSR, compared to 63% for non-financially vulnerable people.

However, when thinking about the purpose of the Multi-Sector PSR, the discussion groups leaned towards not including financial vulnerability. “I don’t believe those with financial vulnerabilities should be supported in the same way that those on a traditional PSR are.”

This was due not only to questions of eligibility and fairness, but also to the fear of sharing financial information with multiple providers. “I would be concerned with inputting financial information onto a Multi-Sector PSR application.”

If the government or individual regulators used the PSR or, in future, a Multi-Sector PSR as a route to identify financial vulnerability, there is a risk of both diluting the PSR and putting off those with a threat to life vulnerabilities from disclosing sensitive information to providers. For this reason, we recommend that the Multi-Sector PSR focuses on supporting those with non-financial vulnerabilities who need essential support during a loss of service.

Alongside progressing a Multi-Sector PSR, the government should build on work around identifying financial vulnerability through data sharing, which we recognise takes time. In our report, *Essentials Made Affordable*, we set out our recommendation for a reformed, tiered Warm Home Discount that provides targeted support based on a household’s energy needs. Our report on social tariffs, *Barriers to Access*, highlighted the need for greater automation in financial support offers for water and broadband. Specifically, we recommend the government using DWP data to automatically determine eligibility for water social tariffs.

Who should lead a Multi-Sector PSR?

The building blocks for the Multi-Sector PSR already exist as there are many data-sharing initiatives between organisations. Money Advice Trust's paper, *Tell Us Once Twenty?* (April 2026), found that there are “at least 20 tell us once initiatives across the UK, from energy to education, and circumstances from death to direct debits.” They also found that in energy and water, there are around 45 separate PSR databases. There are a number of initiatives that are led by the industry and the private sector; including Northumbria Water’s Support for All, the Vulnerability Registration Service, the Experian Support Hub, and the Electralink data exchange. However, without government coordination, these projects have been unable to create a single cohesive Multi-Sector PSR.

There were mixed consumer opinions on who should be in charge of a Multi-Sector PSR, with no clear preference who should lead the work. The options consumers considered in our research included independent organisations, utility companies, government, third-party bodies, or industry. We explore each in turn below.

Independent organisation

Some consumers want a centralised, independent organisation to lead and manage the Multi-Sector PSR. Consumers felt that an independent organisation would be best as they would be neutral and trustworthy. They want an established organisation with the public’s best interests at heart, and no commercial incentive to exploit user data. The organisation could be created by industry, regulators, or the government, but would need government direction to secure the appropriate powers.

Utility companies

Some suggested that utility companies should work together, perhaps rebranded as a new organisation. This would have the benefit of including industry expertise, as organisers would have direct knowledge of the utility sectors and existing PSR infrastructure. There could also be potential for a unified brand if companies work together. However, consumers still feared that their data might be misused for profit. There were worries about how a collaboration between utility companies would work in practice and who would lead the work. The lack of clear accountability is a challenge in cross-sector working and it can be unclear who takes charge of the work

“A collaboration of all companies seems like the best option”
(workshop participant).

Currently, Northumbria Water has led a project called Support for All, which, through innovation funding, has created a system for sharing support needs across energy and water. This is a positive step, but finding cross-sector support and a consistent funding structure has been difficult, which shows the limits of an industry-only model without government leadership. Eventually, the government needs to enable and encourage, with the help of regulators, companies to use the system. The nature of the Multi-Sector PSR is such that competition among data-sharing methods is hindering the development of a system that serves consumers.

Government

A significant number of participants favored the UK government leading the implementation of the Multi-Sector PSR, viewing it as the most secure choice due to the "layer of government protection." This preference was driven by some consumers' high level of trust in the government, believing it would encourage participation and lend legitimacy to the service. Conversely, some participants expressed distrust, stemming from negative experiences with local and national governments, and doubted the government's capacity to execute the project. Despite this divided opinion, the government's legitimacy and independence from commercial interests make it the logical candidate to undertake a project of this complexity.

We note that Scotland has a different model for water and its regulation; it would be necessary to work with the Scottish government and water regulator to ensure that any PSR system is linked up. Consumer Scotland strongly supported the creation of a single, multi-sector PSR in their response to DBT's 2024 consultation.¹⁴ Similarly in response to Ofgem's consumer vulnerability refresh Citizens Advice Scotland highlighted the need for a "universal" PSR, which should be "co-designed with relevant groups".¹⁵

Third-party organisations

Some consumers suggested that consumer watchdogs or a charity like Citizens Advice could run the service. However there were worries about these organisations' capacity to run this service and their ability to scrutinise the providers involved. It may also be a challenge to find an organisation that can coordinate work across sectors. It would be a significant resourcing task for a consumer group to take on.

Industry

There are several private enterprise-led data-sharing services, such as Experian's support hub, which allow consumers to disclose support needs and share them with relevant companies. The Vulnerability Registration Service runs a similar project in which companies pay to access the data, but it's free for consumers. However, it is unclear how consumers can access redress and support if their data is misused.

Consumers were worried about a private industry approach: "They're private enterprises. This is what worries me as they all make money. There's a cost associated which is then passed down to the end user."

Government Oversight

Energy and water industries and regulators have been paving the way for PSR data sharing over recent years. Now is the time for the government to step in and provide clear direction by establishing a pathway to a functioning Multi-Sector PSR by April 2028. The current patchwork of services and systems has shown that the best intentions of industry cannot create a sustainable system, with competition only creating more confusion for consumers. There have been several proof of concepts using innovation funding and private sector projects. The government should build on the learnings of these systems and potentially the infrastructure used, to create a Multi-Sector PSR. We need oversight of this policy space before consumers lose faith in the system.

"This scheme would be more trusted if the government were involved in regulating it."



Data Sharing and Process

Data sharing

Trust is a critical factor in the successful adoption of a Multi-Sector PSR, with data sharing concerns a major barrier for some consumers to engage.

We found significant data sharing concerns, with nearly half (43%) of consumers expressing a worry about sharing their personal data, fearing potential privacy breaches. A minority in workshops and interviews stated they would not opt-in due to anxieties about how their data, particularly sensitive health information, would be shared and used.

However, if trust can be established then consumer support increases. For instance, in our survey, after details about data sharing were provided, support for the Multi-Sector PSR either held steady or increased for 86% of respondents.

Furthermore many consumers saw the benefits of a Multi-Sector PSR as outweighing the perceived drawbacks of data sharing, with the majority of consumers (76%) prefer registering for support once, rather than with individual companies. This indicates that with proper reassurance, consumers will opt-in, provided the benefits are clear and substantial.

Importantly we found that existing PSR users are more supportive of a Multi-Sector PSR. Specifically, 78% of people registered on an energy or water PSR were more likely to support the introduction of a tell-us-once system, compared to 68% of those not on a PSR.

If the Multi-Sector PSR is to be used for life-threatening situations, building and maintaining consumer trust that their data, especially health data, will be securely stored and correctly used is essential. We found that over half (52%) of people would want to know about how their personal information is used and protected.

"It's always scary when you put your data out there in more and more places. You worry about potential frauds."

To ensure that consumers have trust that their data is being stored carefully and accessed properly. We recommend government oversight of data sharing to ensure consumer trust, access to data, and consumer redress. A redress mechanism, such as a data ombudsman, should be created to empower individuals if a company or data sharing system breaks the rules.



Wider data sharing

We also explored how consumers felt about sharing data with the healthcare sector and local authorities. Across the workshops, many were happy to provide the information, assuming they already had it. They also mentioned that it could catch people who don't know about the services. One interviewee expressed concern about data sharing with healthcare providers and local authorities, fearing potential involvement by social services. Some vulnerable consumers will need reassurance that their data won't be used by other government bodies such as the DWP or the police. But overall, many thought that sharing between essential services and the NHS could be useful in the future.

"I think with healthcare especially, I think it's a lot of repeating yourself. If they already know your situation, it'd make life a lot easier for everyone."

Data continuity when switching supplier

In the Scotland focus group it was brought up that a Multi-Sector PSR would be "useful for when you change suppliers." Currently, when energy PSR-eligible consumers switch suppliers, if they signed up to the PSR via their supplier, they would need to re-register with their new supplier. The electricity and, if relevant, gas network would otherwise remove them from the PSR database.

While a Multi-Sector PSR would solve this problem, in the meantime, we recommend that the energy sector works to ensure that consumers only need to register once for the energy PSR. We would put the emphasis on suppliers to ensure that they are not removing consumers from the PSR when the consumer is not moving home but only switching their supplier.

In Money Mental Health's Policy Institute report *Stuck on repeat*,¹⁶ they found that consumers were also worried about information being lost when suppliers go out of business. They recommend looking at the Supplier of Last Resort (SoLR) Process, to ensure consumer vulnerability data is not lost in the transfer of consumers. Ultimately, a centralised data system would ensure that consumers data is safe in the case of company failure. However, in the meantime, we agree with the MMHPI and recommend that energy suppliers and Ofgem should work to ensure that PSR data is seamlessly transferred in the event of a SoLR.

Formalised Needs Code across sectors

To reduce consumer confusion and to create a Multi-Sector PSR, we recommend setting up a common register of support needs. We recommend that Ofgem, Ofwat and Ofcom should come together with industry and consumer organisations, including Citizens Advice, to align the categorisation of support needs and terminology across sectors.

While industries have made important steps to creating shared needs codes within sectors, through the work of organisations like the Safeguarding Consumers Working Group, these changes are voluntary and don't have regulatory oversight. To safeguard consumers before the PSTN deadline, the alignment of needs codes should be formalised. This should happen first within specific sectors and subsequently across sectors. This process should be facilitated through working groups sponsored by regulators, complementing and building upon the efforts of existing cross-sector vulnerability groups.



Ideal Consumer Journey

We asked consumers to think about what the design of an ideal Multi-Sector PSR would look like. We looked at different steps of the consumer journey: awareness, eligibility, benefits, and data sharing.

"It should be person-centred, friendly and accessible"

Awareness

In our survey we found that 61% of people would want there to be dedicated Multi-Sector PSR resources (e.g. a specific website) to raise awareness of the support service. Furthermore 61% of people wanted their utility suppliers to provide information about a Multi-Sector PSR. Raising awareness of the Multi-Sector PSR will be a key challenge which will need the support of government, industry and consumer bodies.

Eligibility criteria

In the initial phases of the consumer journey, clear communication of the Multi-Sector PSR's eligibility criteria, application procedure, and the available services or benefits is essential. 69% of consumers wanted to know the eligibility criteria for a Multi-Sector PSR so they could decide whether to sign up for the service.

Consumers also expressed a desire for the eligibility criteria to be clearly structured into distinct themes and explicitly linked to the available support options. They requested practical examples demonstrating how an individual could meet each criterion.

Consumers generally want their eligibility to be confirmed, with some even suggesting evidence submission as proof, followed by the ability to select the support options they qualify for. However, consumers acknowledge that this verification process might deter some applicants due to the added administrative and time burden.

To ensure no details are overlooked and that people receive the support they believe they need under the Multi-Sector PSR, consumers also requested the inclusion of a "write-in" box to add in information that might not be covered by the PSR categories.



Needs-based support

Opinion was divided about whether the Multi-Sector PSR should deliver needs-based support. While consumers appreciated the ability to select available services, they also desired a criteria-led approach based on specific conditions.

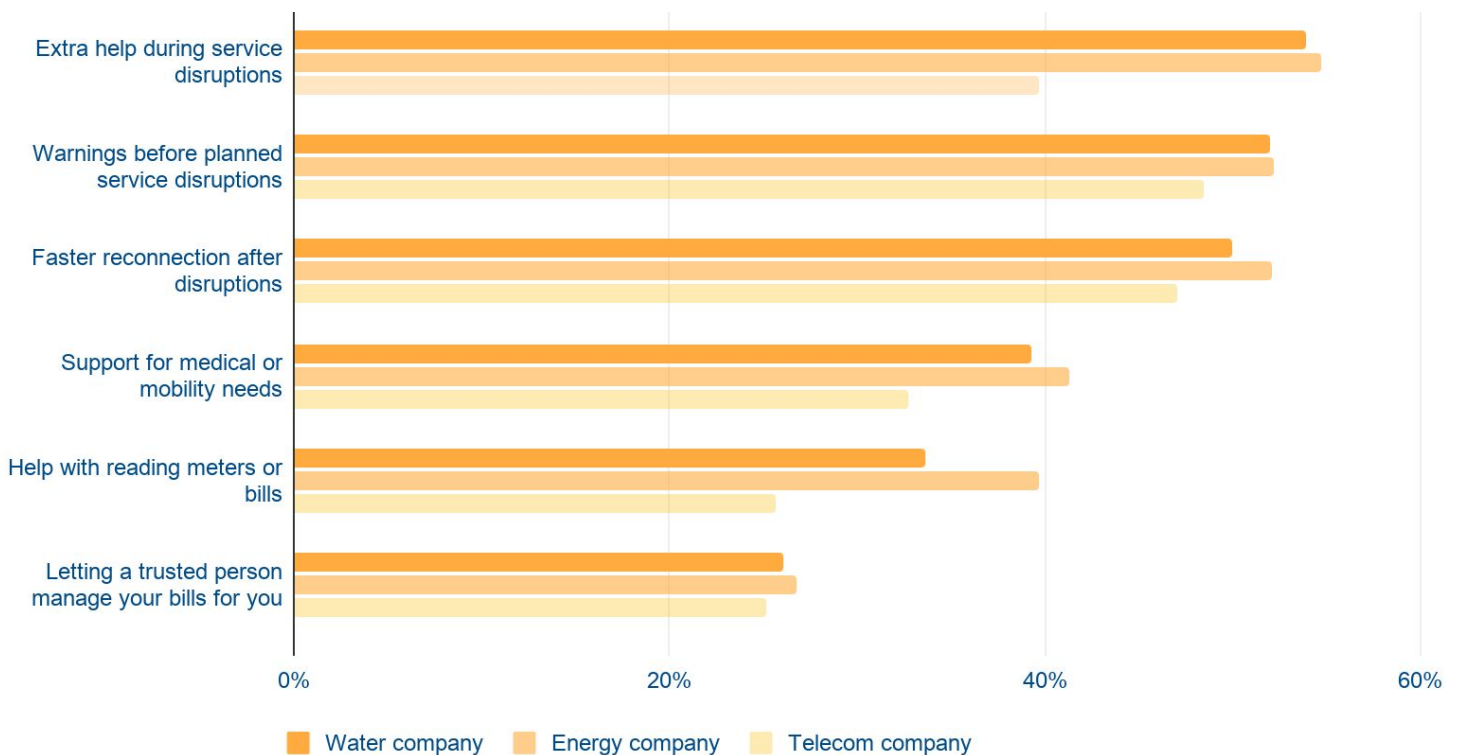
Our suggestion for developing the Multi-Sector PSR is a diagnosis-based framework that retains flexibility. This would enable companies to proactively offer suitable support. It is crucial that consumers are not forced to actively seek the help they qualify for. Support should be automatically provided, particularly in critical situations like power cuts and medical emergencies.

“If it's open to too many people ... it becomes a vast amount that no company would be able to handle... otherwise you're going to have vans running around with bottles of gas and bags of water and all sorts for everyone.”

Benefits

Consumers want to know the benefits of being signed up to the Multi-Sector PSR, with 66% reporting they would want to know about the benefits of being registered. Consumers expect the Multi-Sector PSR to deliver practical support through utility providers, specifically to address inconveniences caused by service disruptions.

Expected support provided by a Multi-Sector PSR



Sign up

Consumers want an easy way to sign up to the Multi-Sector PSR. Interviewees noted that when signing up for the example Multi-Sector PSR portal, they struggled with finding an account number. Due to the multi-sector approach of the PSR, it would be important for consumers to be able to sign up with their name and postcode, rather than individual utility account numbers.

“Calls would be less stressful with utility companies if account number wasn't the first question you faced - it puts people off.”

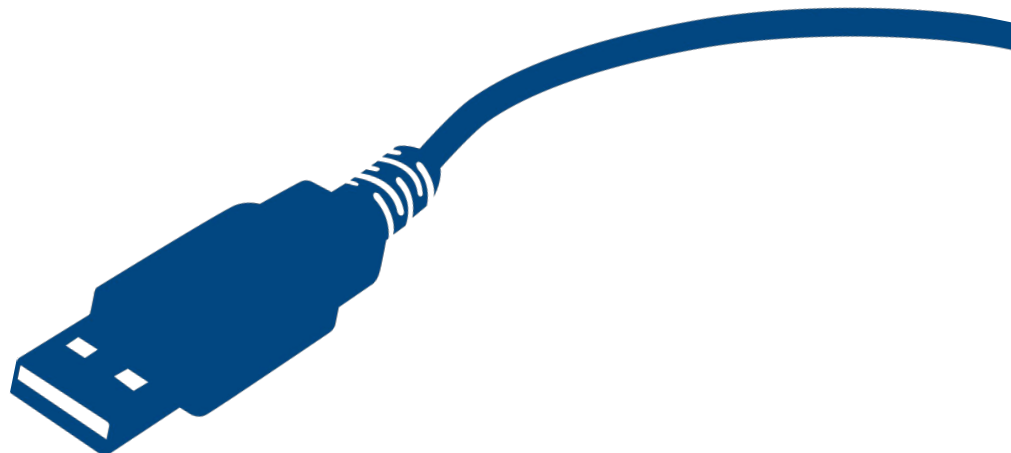
Consumer Portal

In our response to DBT's consultation on a Tell us Once system, we noted the importance of a consumer-facing portal or interface for people to be able to disclose their needs and understand how their data is being used. In our research, we found that 82% of people would prefer to interact (e.g. requesting support, updating details) with a Multi-Sector PSR online (e.g. email, online form, online portal). Furthermore, there was strong support for a customer portal in the focus groups.

Another method would be to integrate the system into companies current consumer accounts. Some consumers, who were digitally engaged, wanted to see support integrated into the apps of individual utility companies. They noted that they used their supplier apps, and suggested that having the ability to add and amend their information within the apps would be useful.

Digitally Excluded

Whatever offering is created, there needs to be provision for those who are not digitally engaged. Consumers wanted multiple communication channels and support for those who are offline or digitally excluded. In the focus groups and interviews, it was specifically suggested that telephone operators provide support, guiding people through the sign-up process. This could be similar to the 111 emergency service, which can be accessed by phone or online. Interviewees who were eligible for the PSR noted that this was important not only for those who were offline but also for those who might need extra support with communication, such as those who are dyslexic or unable to write or type.





Policy Recommendations

Next Steps

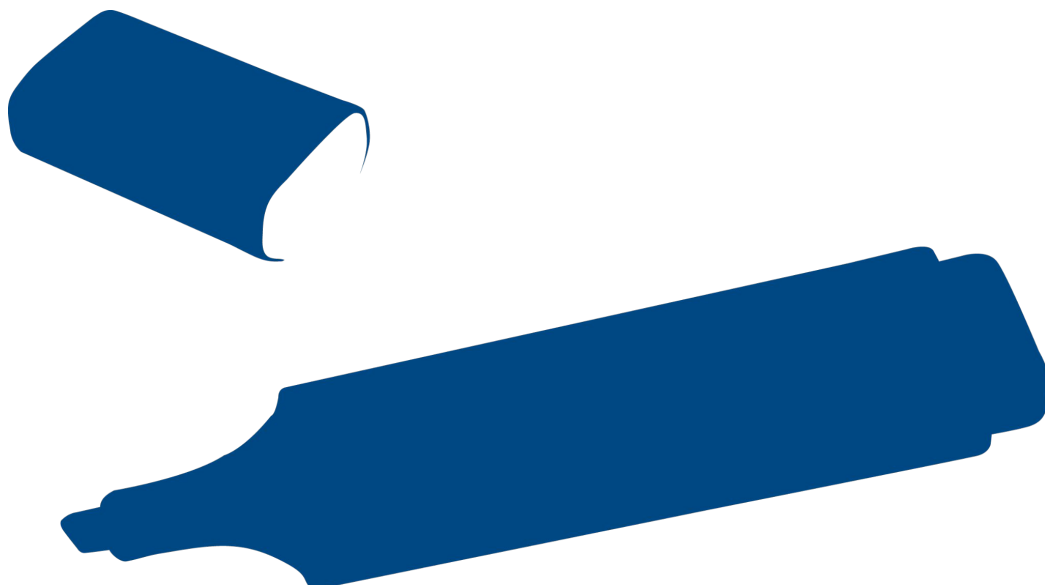
It's time to take action and improve the way people access support in essential services. We're calling on the government to:

- Restart the Multi-Sector PSR working group, bringing together influential bodies including consumer groups, regulators, industry, and government departments.
- Build on the work of trials and current work programmes to share vulnerability data between essential utilities (water, energy and telecoms) with a view to data-sharing in other sectors.

Government leadership is needed to achieve a truly multi-sector solution.

Policy Recommendations

1. The UK Government should commit to facilitating a Multi-Sector PSR in essential utilities (specifically Water, Energy and Telecommunications) for implementation by April 2028. This aligns with the start of the ED3 price control for electricity distribution, as well as timelines on water and energy data sharing.
 - a. Ofgem and Ofwat should oversee the enabling of seamless data sharing between the Water and Energy sector by April 2027.
 - b. Ofcom should work with Ofgem and Ofwat to prepare the water sector to implement a Multi-Sector PSR by April 2028.
 - c. There should be a consumer-facing element of the Multi-Sector PSR that allows consumers to access, edit, and control their data, either through suppliers or a standalone portal.
 - d. We recommend that a single government department takes on responsibility for delivering the Multi-Sector PSR, either The Cabinet Office, Department for Business and Trade (DBT) or Department for Science, Innovation and Technology (DSIT) would be well-placed to take responsibility for delivering the project.
2. The Multi-Sector PSR should primarily relate to 'threat to life events', ensuring those who need extra support during 'loss of supply' are supported
 - a. Communication needs (e.g. English as a second language) should be included, as in a loss of supply, being able to communicate effectively with a consumer is essential.
 - b. The design of the Multi-Sector PSR should not record financial vulnerability nor provide financial support. There are other pathways which are more appropriate for identifying financial need.



3. Essential utilities in Energy, Water and Telecommunications that are using the Multi-Sector PSR should focus on ensuring that high-risk, vulnerable consumers receive meaningful support and are protected from harm.
 - a. The Multi-Sector PSR should aim to capture all vulnerabilities; the focus should be on data depth rather than breadth to enable effective, targeted support for those most at risk during an outage.
 - b. Essential utilities should be required to check in periodically (for instance every 12 months) with those whose support needs have been shared through the existing PSR sharing system.
4. To enable trust in a Multi-Sector PSR, the UK Government should create or empower an existing organisation to oversee data sharing in essential services to ensure consumer trust, access to data, and consumer redress.¹⁷
 - a. This redress mechanism could be a data ombudsman, or similar organisation. It could have wider reach than the Multi-Sector PSR, enforcing standards for data-sharing across services.
5. To create the basis for a Multi-Sector PSR, regulators of essential utilities in Energy, Water and Telecommunications - Ofgem, Ofwat and Ofcom - should come together with industry and consumer organisations, including Citizens Advice, to align the classification of support needs and terminology across their sectors.¹⁸
 - a. Individual sectors should align their needs codes with oversight from their regulators and input from consumer organisations, to allow for sharing within their sector.
 - b. The alignment of classification of support needs and terminology should happen as soon as possible to mitigate risks from the PSTN switch-off in early 2027.
 - c. In the meantime, a category should be added to the Energy PSR needs code to identify people who are at risk of being unable to contact anyone during a power cut by February 2027.
6. Switching: The Energy sector should work to ensure that consumers only need to register once for PSRs within the Energy sector. We would put the emphasis on suppliers to ensure that they are not removing consumers from the PSR when the consumer is switching suppliers and staying in the same property. This should be resolved by January 2027.



Footnotes

1. Tell Us Once Twenty? A review of initiatives that allow people to share their support needs with multiple organisations (April 2026) Money Advice Trust
2. Lees C and Wells K. Stuck on repeat: Making it easier for people with mental health problems to share support needs across essential services providers. Money and Mental Health Policy Institute. 2026
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18. ibid

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