

christians  
against  
poverty

**CAP**

# **Consultation on the Consumer Protection Programme 2024-2029**

CAP's official response to the Utility  
Regulator's consultation on the  
Consumer Protection Programme  
2024-2029

December 2023

**1. Do you agree with the three themes that have been identified for CPP 2024 - 2029? Please provide any additional information to support your view.**

Broadly yes, although in the last Programme, the fact that 'affordability' was a separately stated objective was, in our view, very helpful. Cost continues to be a massive factor for many, which is evidenced by the UR's own data referenced in the draft CPP, and very much in the experience of those we work with. Having said that, we welcome the fact that the Protection theme includes both price and non-price protection and we note and welcome the obvious awareness of challenges facing so many and the work planned to assist with this. The fact that this is a consistent theme throughout the CPP, (included, especially, in the themes of Research and Leadership and Protection) and knowing, as we do, the Regulator's commitment to protection of consumers, especially the most vulnerable, reassures us on this point.

**2. Do you agree that a five-year CPP with a mid-term review after three years is a suitable duration and approach? Please provide your rationale.**

This seems a sensible approach, with the need for maximum flexibility in programmes like this so apparent in light of world events since Spring 2020.

**3. In relation to 'Theme 1: Research and Leadership': a. Do you agree with the proposed areas of work and projects identified under this theme? Please provide any additional information to support your view, including any additional areas or projects that you feel should be of focus. b. Are there any projects that require prioritising within years one to three of the CPP? Please provide your rationale as to why.**

- a. Yes, broadly. We particularly welcome the commitment to continue to produce data around consumer experience of debt and affordability. We find such data so useful for organisations like ours, as using it in our representations to government and others, along with our own data and client's experiences, adds strength to our position.
- b. We feel that research into the specific, and difficult, issue of self disconnecting energy customers, those with Pre Payment Meters, would be very useful. We note this is mentioned under the 'Protection' theme but, given its importance, including it here would, in our view, send a strong message about how vital it is that this issue is tackled.

- 4. In relation to 'Theme 2: Enablement': a. Do you agree with the proposed areas of work and projects identified under this theme? Please provide any additional information to support your view, including any additional areas or projects that you feel should be of focus. b. Are there any projects that require prioritising within years one to three of the CPP? Please provide your rationale as to why.**

We broadly agree. Energy literacy is so important in ensuring consumers can make informed decisions. We therefore welcome the commitment to improve this, together with the commitment to look at information, how it is provided, its clarity and complexity to ensure consumers receive the information they need in accessible ways.

- 5. In relation to 'Theme 3: Protection': a. Do you agree with the proposed areas of work and projects identified under this theme? Please provide any additional information to support your view, including any additional areas or projects that you feel should be of focus. b. Are there any projects that require prioritising within years one to three of the CPP? Please provide your rationale as to why.**

- a. We are broadly in agreement with the areas of work in this proposed theme and want affordability to be at the core of this, as mentioned above.

We welcome the price and non price protection measures.

In respect of price protection, we welcome the commitment to continue work on debt and affordability and particularly welcome the commitment to explore issues around self disconnection and how to address it.

While we welcome the proposed Working Group, we had, in our response to proposals on Customers in Vulnerable Circumstances, raised some concerns and thoughts around membership of such groups and what, we feel, should be a duty to consult. Without repeating those here, we feel it is so important to ensure membership of such working groups is properly representative and that any such group is effective and a strong encouragement, if not a duty to, to consult widely to ensure a wide range of views.

In relation to non price protection, we very much welcome the publication of the Best Practice Framework.

Having seen what has been achieved by the Consumer Energy Charter to date we regard it as a fine example of collaboration between interested parties as well as of flexibility and agility to achieve some immediate impact quickly. These attributes are all much needed and it is purview that this Charter should be extended further again and that the voluntary involvement of the energy suppliers should continue to be very much encouraged.

Our comments above about the proposed Working Group also apply to the groups mentioned at paragraph 2.31 as the need for any such groups to be made up of, as well as hearing from, the correct organisations is vital.

- b. In the consultation paper issued in June 2023 on Customers in Vulnerable Circumstances, the UR had stated it was open to consider in the Consumer Protection Programme a suggestion that suppliers should provide consumers with an annual review to ensure they are on the lowest tariff and payment method. We note that this does not appear to be included at this stage and feel that it would be appropriate to include this measure under Protection measures

**6. Do you agree that where this document has an impact on the groups listed, those impacts are likely to be positive in relation to equality of opportunity for utility consumers?**

CAP has not provided an answer to this question.

**7. Do you consider that the proposals need to be refined in any way to meet the equality provisions? If so, why and how? Please provide supporting information and evidence**

CAP has not provided an answer to this question.

**8. In relation to developing and implementing CPP 2024-2029, is there anything else not covered by questions 1-7 that UR should consider?**

Nothing occurs at present.

## About Christians Against Poverty (CAP)

Christians Against Poverty (CAP) won't sit back and let poverty destroy lives. CAP is a UK-wide charity that equips local churches with the tools and expertise to support people facing debt and other financial challenges in their communities.

CAP Debt Help provides holistic support for families and individuals facing problem debt with a free face-to-face service – tackling both financial difficulty and the wider emotional impact. CAP tackles the causes and consequences of UK poverty through free community groups, also run through local churches. This includes Job Clubs, Life Skills groups and the CAP's Money Management course.

All CAP's services are provided free of charge. We are committed to our services being accessible and inclusive. We support people from all faiths. We do not discriminate by age, gender reassignment, being married or in a civil partnership, being pregnant or on maternity leave, disability, race, religion or belief, sex or sexual orientation.

Find out more about Christians Against Poverty at [capuk.org](http://capuk.org).

## Requests for further information

This response has been written by Paul Livingstone, Partnership Manager Northern Ireland for Christians Against Poverty (CAP), with contributions from:

Alison Flanagan Head of CAP Northern Ireland  
Kiri Adams, Social Policy Manager

Please send requests for further information to:

Paul Livingstone  
C/o External Affairs  
Christians Against Poverty  
Jubilee House  
1 Filey Street  
Bradford  
BD1 5LQ  
[externalaffairs@capuk.org](mailto:externalaffairs@capuk.org)



[capuk.org](https://capuk.org)



Charity Registered No: 1097217 (England & Wales), SC038776 (Scotland).  
Company Limited by Guarantee, Registered in England and Wales No. 4655175.  
CAP is authorised and regulated by the Financial Conduct Authority.