

**Advice NI Response to the Utility Regulator's Care Register Review: special provisions for vulnerable customers (a Consumer Protection Strategy Project).**

**Deadline:** 29<sup>th</sup> September 2017

Advice NI welcomes the opportunity to respond to the Utility Regulator's Care Register Review: special provisions for vulnerable customer's consultation document. **Section 1** includes background information on Advice NI and a general overview. **Section 2** then highlights our response to the consultation.

**Section 1: Background & Overview**

Advice NI is a membership organisation that exists to provide leadership, representation and support for independent advice organisations to facilitate the delivery of high quality, sustainable advice services. We provide our members with advice and information management systems, funding and planning, quality assurance support, training from foundation to diploma level, social policy co-ordination and ICT development to ensure best practice, best value and effective advice services delivery.

Membership of Advice NI is for organisations that provide significant advice and information services to the public. We have over 60 member organisations operating throughout Northern Ireland and providing information and advocacy services to over 263,000 enquiries on an extensive range of matters including: social security, housing, debt, consumer and employment issues. For further information, please visit [www.adviceni.net](http://www.adviceni.net).

Advice NI also manages the NI Business Debtline which is a free telephone service offering tailored, independent and impartial advice for sole traders, partnerships and Limited Companies. It has been operating since 2013 and is currently funded by the Money Advice Trust. Since June 2013 the adviser has helped over 1,800 businesses and has dealt with over 5,000 calls. For further information and to access our factsheets visit [www.adviceni.net](http://www.adviceni.net) or [www.businessdebtline.org](http://www.businessdebtline.org).

Advice NI is delivering a project to offer support to anyone needing help or advice relating to any of the changes to the welfare system. The project has been operating from November 2016, funded by the Department for Communities and works in partnership Citizens Advice and the Law Centre NI. The project to date has dealt with over 35,000 client issues.

Advice NI manages a specialist Tax and Benefits Service supported by HMRC. The service supports members of public across Northern Ireland who are struggling with issues relating to HMRC products and services. The service deals with over 6,000 enquiries per annum and is available throughout Northern Ireland.

## **Section 2: Response to Consultation**

Advice NI would advocate an approach which is consistent with <https://www.health-ni.gov.uk/sites/default/files/publications/dhssps/adult-safeguarding-policy.pdf> in particular:

**A Rights-Based Approach:** To promote and respect an adult's right to be safe and secure; to freedom from harm and coercion; to equality of treatment; to the protection of the law; to privacy; to confidentiality; and freedom from discrimination.

**An Empowering Approach:** To empower adults to make informed choices about their lives, to maximise their opportunities to participate in wider society, to keep themselves safe and free from harm and enabled to manage their own decisions in respect of exposure to risk.

**A Person-Centred Approach:** To promote and facilitate full participation of adults in all decisions affecting their lives taking full account of their views, wishes and feelings and, where appropriate, the views of others who have an interest in his or her safety and well-being.

**A Consent-Driven Approach:** To make a presumption that the adult has the ability to give or withhold consent; to make informed choices; to help inform choice through the provision of information, and the identification of options and alternatives; to have particular regard to the needs of individuals who require support with communication, advocacy or who lack the capacity to consent; and intervening in the life of an adult

against his or her wishes only in particular circumstances, for very specific purposes and always in accordance with the law.

**A Collaborative Approach:** To acknowledge that adult safeguarding will be most effective when it has the full support of the wider public and of safeguarding partners across the statutory, voluntary, community, independent and faith sectors working together and is delivered in a way where roles, responsibilities and lines of accountability are clearly defined and understood. Working in partnership and a person-centred approach will work hand-in-hand.

Based on the information above, Advice NI believes the ideal scenario for care registers is to ultimately have the one register similar to the organ donation register or the new open banking initiative. A new entity should be established with the sole purpose to develop and maintain one care register for NI. This would support the customer only to 'tell their story once'. This could be a very simple registration detailing the customers care needs, if they have a representative, tick what utilities they use and give consent to share their data with the appropriate companies. The utility companies should pay for this entity and to access the service and only have access to the data that is relevant to them. This could be reviewed regularly to ensure that the information is up-to-date. This would avoid duplication of effort. It would also allow for a cleaner, concise and clearer communication and promotional strategy, were all utility companies (including gas) promote the one service. This saves customer confusion and will increase the impact of the message.

We would have concerns regarding the work that has been done so far on the care registers that NIW only have 2,778 customers on their register yet according to their website<sup>1</sup> they have 840,000 customers which is 0.3%. There are no criteria for being registered on this yet the uptake is very low. Also NIE has 6,000 registered customers yet they have 860,000 customers which is 0.7%, again this is much lower than what we would expect. This would seem to indicate that NIW and NIE have not promoted or seen this the care registers as a priority.

We believe that there are a number of priority groups that should be targeted to be on this register and other registers – this should not be considered an exhaustive list. This does

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<sup>1</sup> NI Water, 2017 <https://www.niwater.com/facts-and-figures/>

not mean that everyone in these categories will need or want to be registered but they should be offered the choice. These include:

- **Older people.** According to government statistics in 2014 people aged 65+ made up 15.5% of NI's population and this will increase to 24.7% by 2039. Over three in five have a long term illness and one third has mobility problems.
- **Cancer patients.** In 2009-2013 there were 8,622 cancers diagnosed per year<sup>2</sup>. This is steadily increasing.
- **People with long term health issues.** In May 2017<sup>3</sup> there were 127,900 people on Employment and Support Allowance; 199,680 claiming Disability Living Allowance (DLA) (there are no statistics yet for Personal Independence Payment which has replaced DLA in 2016), 51,100 claiming Attendance Allowance and 72,970 claiming Carers Allowance. The Department for Communities also highlight that there is approximately 1 in five people in NI have a disability including mental health<sup>4</sup>.
- **Households with young families/sick babies and dependents.** In 2015 there were 24,215 children born<sup>5</sup> in NI and last year 2,000<sup>6</sup> babies spent time on a neonatal unit and the Children's Hospital<sup>7</sup> dealt with 33,000 children each year.
- **Isolated rural households.** One in every three<sup>8</sup> people live in rural areas and this is growing, whilst there are a number of positive when people become vulnerable and they lose a necessity like water and electricity the situation can become desperate very quickly.
- **Any Business with live stock.** According to the Department of Agriculture, Environment and Rural Affairs<sup>9</sup> there were 24,500 farms in NI in 2016.

Failing the fact that there is no one system, we do agree that there should be a consistent, collaborative approach when promoting care registers. Data sharing agreements should be developed to allow the flow through of information and for this to be regulatory

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<sup>2</sup> Queens University Belfast, 2014, <http://www.qub.ac.uk/research-centres/nicr/FileStore/PDF/NIrelandReports/Filetoupload,532183,en.pdf>

<sup>3</sup> Department for Communities, 2017, <https://www.communities-ni.gov.uk/sites/default/files/publications/communities/benefit-statistics-summary-may-2017.pdf>

<sup>4</sup> Department for Communities, 2015, <https://www.communities-ni.gov.uk/sites/default/files/publications/communities/frs-201415.pdf>

<sup>5</sup> NISRA, 2015. <https://www.nisra.gov.uk/publications/live-births-1887-2015>

<sup>6</sup> Tiny Life, 2017, <https://www.tinylife.org.uk/>

<sup>7</sup> Belfast Trust, 2017, <http://www.belfasttrust.hscni.net/hospitals/ChildrensHospital.htm>

<sup>8</sup> Department of Agriculture and Rural Development, 2016, <https://www.daera-ni.gov.uk/sites/default/files/publications/dard/tackling-rural-poverty-and-social-isolation-2016-new-framework.pdf>

<sup>9</sup> Department of Agriculture, Environment and Rural Affairs, 2016, [https://www.daera-ni.gov.uk/sites/default/files/publications/daera/16.17.214%20The%20Agricultural%20Census%20in%20NI%202016%20final\\_0.PDF](https://www.daera-ni.gov.uk/sites/default/files/publications/daera/16.17.214%20The%20Agricultural%20Census%20in%20NI%202016%20final_0.PDF)

updated. NIW and NIE should also use other media platforms such as social media and other innovative ways to promote care registers. Both companies should collaborate to work with advice and other charities, landlords and health care professionals to promote the care registers and the benefits. Advice NI provides various training sessions and we would be open, where appropriate, to promote the care registers to participants.

We believe it is paramount that any NIW and NIE employee who has dealings with customers should be trained on the care registers and is confident in speak about these, the benefits and sharing data with each other to ensure that the customer is fully informed. The companies must build a mechanism so that customers who do not want to their name to be included on a care register or a particular register that this is captured so they do not feel harassed in the future. We agree that all utility companies should engage with each other and that this could be facilitated through the Utility Regulator as a forum to share best practice.

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