



Commissioner for **Older People**
for Northern Ireland

Meadhbh Patterson
The Utility Regulator
Queens House
14 Queen Street
Belfast
BT1 6ED

29 September 2017

Dear Meadhbh,

RE: Care Register Review: special provisions for vulnerable customers (a Consumer Protection Strategy Project)

I am writing to you on behalf of the Commissioner for Older People for Northern Ireland in relation to the proposals outlined in the Care Register Review consultation document. The role of the Commissioner is to promote awareness of issues relating to older people and to be an authoritative champion for them. The Commissioner's office has reviewed the proposals outlined in the consultation document and welcomes the opportunity to respond to them.

Proposals

In light of the introduction of the Department of Health's Transforming Your Care (TYC) strategy, there will be a 'shift left' to the home being the hub of care provision and this will undoubtedly mean greater reliance of electricity and gas in the home. The Commissioner also recognises the different levels of service required by customers with various needs and is pleased to see the steps being implemented through the two network care registers. The Commissioner also notes there are examples of good practice within both care registers and believes it would be beneficial if there was a uniform approach to what is delivered (e.g. customer and nominated carer contact through half yearly contact through telephone calls, etc.).

Ensuring these care registers are adequately publicised will be a major element of their success and the Commissioner understands that this is work in progress for both NI Water and NIE Networks. The introduction of a 'common bi-annual vulnerable customer forum' will be a good mechanism to highlight the purpose and effectiveness of the register and will assist in informing those who are registered. However, it is important to note that many older people who are registered may have mobility and/or cognitive impairments, making it difficult to attend such meetings.



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The proposal to establish an annual industry forum for care registers for relevant stakeholders will be very useful and will allow for the cascading of information to those customers deemed vulnerable and/or already registered. Similarly it is important to ensure not all communication is 'digital by default' and that other methods of engagement will be utilised, including promotional leaflets and telephone calls (where feasible). The Commissioner is also happy to provide support in disseminating information and publicising customer care registers where possible.

Finally, the Commissioner fully supports the sharing of data between NI Water and NIE Networks with the aim of benefiting any vulnerable customer and assisting in the uptake of registration onto customer care registers. The variation between the two registers is stark and highlights that more work needs to be carried out in promoting this service, but in the interim the sharing of data will positively impact on the lives of those who are reliant on these utilities for their health and well-being.

If you would like to discuss any of these points in further detail, please do not hesitate to contact the Policy Team via:

Emer Boyle,
Head of Legal and Policy Advice
(028) 90 890 894
emer.boyle@copni.org

Yours sincerely,

Emer Boyle
Head of Legal and Policy Advice
Commissioner for Older People for Northern Ireland