



Commissioner for **Older People**  
for Northern Ireland

Sinéad Dynan  
The Utility Regulator  
Queens House  
14 Queen Street  
Belfast  
BT1 6ED

12 June 2015

Dear Sinéad,

**RE: Consumer Protection Strategy 2015/16 – 2019/2020 Consultation**

I am writing to you on behalf of the Commissioner for Older People for Northern Ireland in relation to the proposals outlined in the Consumer Protection Strategy 2015/16 – 2019/2020 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 agrees with the focus on affordability; equal access; empowerment and leadership. Whilst the Office has reviewed the full strategy, our comments are confined to the issues we have identified as relevant in chapter seven.

**Affordability**

In light of the introduction of the DHSSPS 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 use of electricity and gas in the home. This in turn will push usage and costs up so mechanisms must be put into place that will help older people to manage increasing costs in an equitable manner.

The Commissioner would also welcome a reviewed billing code of practice with unambiguous language and the provision of support where needed, especially for consumers in crisis. The Commissioner is aware that there is an obligation on energy suppliers to work with consumers once they make contact regarding crisis management and debt accrual however this is something that should be widely publicised to reduce the fear of making initial contact with suppliers when any crisis first arises.



In relation to debt management, the Commissioner is aware of the Common Financial Statement (CFS) used by debt advice agencies to make debt repayment offers to creditors on behalf of clients. The use of the CFS is something that should be adopted by all utility suppliers as a form of good practice and thorough consideration should be given to the fact that if an individual is in debt to an energy supplier, most likely it is not the only debt outstanding. In the current Northern Ireland context, it is likely that this may be exacerbated by the progress of welfare reform and the push to make the home the hub of care as outlined in TYC, which in practical terms mean rising energy costs coupled with diminishing income for many older people.

### **Equal access**

The consultation document makes reference to the need to review the critical care and customer care registers to ensure they are fit for purpose and while this is an important issue, the Commissioner would like to see widespread promotion of the registers in the first instance to ensure those older people who would benefit from it are aware of it.

It would also be useful for those older people who are deemed to be 'qualifying' to be placed on the critical care and customer care register to receive a visit from the utility supplier on a mandatory basis as good practice. This would ensure older people are fully aware what being on the registers actually means and how to contact the supplier in the case of a major incident or significant supply issue.

Further to this, the draft strategy states how there is a need for improved communication in the event of a major incident or other significant supply issue. The Commissioner believes that this could have a particularly detrimental effect on an older person who is reliant on life saving equipment and would welcome the opportunity to input into the communication strategy to ensure that it is fit for purpose.

### **Empowerment**

In relation to empowering consumers, the draft strategy outlines the need to work with stakeholders to increase consumer awareness about their ability to move between energy suppliers and to ensure bills and billing information is transparent and easy to understand. The Commissioner welcomes any work that will provide guidance to older people on how to save money on energy bills whilst providing clarity and certainty on what they are paying for.

Whilst the draft strategy makes reference to developing a Northern Ireland based website to provide a comparison tool on energy suppliers prices, older people would also benefit from advice being available from other sources in the form of factsheets or leaflets and a free phone telephone helpline. Again, the office of the Commissioner



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would be happy to meet with representatives from the Utility Regulator to highlight good practice in how to disseminate this information in an equitable manner.

A review of guidance for tenants, landlords and their representatives would also be welcomed by the Commissioner. This is an issue that may affect older people living in supported housing alongside those who are privately renting. Therefore there is a need to make sure older people are aware of their rights and responsibilities in relation to the changeover and management of account details if they become a new tenant.

In addition to this, the Commissioner would like the review to ensure that the maximum resale price regulation is included and adhered to by both private sector landlords and housing associations, meaning that older people are not disproportionately charged for energy by a second party. Given that the intention of the TYC policy will see more older people staying at home for longer and consequently with higher energy bills, would there be any scope for the introduction of an older person's tariff or a capping mechanism? This could be linked to the critical care and customer care register and could help mitigate any extra costs associated with the introduction of TYC.

### **Leadership**

Finally, the draft strategy outlines the intention to provide leadership and work closely with stakeholders to ensure any policy developed is evidence based and improves relationships across the relevant groups. The Office of the Commissioner for Older People would be very keen to be involved and would be grateful to be added to the list of key stakeholders.

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

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Yours sincerely,

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