Alison Farr Social & Environmental Branch Queens House 14 Queen Street BELFAST BT1 6ER

21 March 2009

Dear Alison

## The Utility Regulator's Social Action Plan 2009-2014 (CONS 1014)

NICVA (the Northern Ireland Council for Voluntary Action) is the umbrella body for the voluntary and community sector in Northern Ireland. It provides its 1,130 members with information, advice, training and support services on a wide range of issues, together with representation for the sector as a whole.

NICVA works to achieve progressive social change, based on equality and equity, working through a community development approach, to empower local communities to pursue their own needs and agendas.

NICVA agrees that the Utility Regulator's Social Action Plan represents a unique opportunity for a single organisation to bring forward a co-ordinated strategy for the protection of vulnerable utility customers, and to ensure disadvantaged customers receive the same levels of service as other customers when they purchase gas and electricity. However we would like to raise a number of other points:

The definition of vulnerability used for the purposes of this consultation fails to include a number of significant groups, particularly children, older people, and ethnic minorities. The Utility Regulator should define vulnerability by consulting with a wider range of social partners. As the number of people falling into this category due to the current economic climate is growing, the definition of vulnerability should not be left to utility companies.

NICVA welcomes making information on assistance schemes for vulnerable customers more widely available. It should be recognised that voluntary and community organisations can play an important role in raising awareness of, and helping to identify isolated vulnerable people who would benefit most from, these schemes.

Responsibility for alleviating fuel poverty lies with Government, and any monitoring targets for the Social Action Plan should feed into the Government's Anti-Poverty Strategy and the Office of the First Minister and deputy First Minister, the lead department for the strategy.

However, the provision of a social tariff may be the most effective way of ensuring help reaches the most vulnerable people. This tariff should be

available to the growing 'working poor' who are dependent on low wages and salaries as well as those who are in receipt of benefits.

As voluntary and community organisations are unclear about the role and responsibilities of the Regulator and what powers it has in relation to social policy issues, regular meetings with the regulator would be useful for the purpose of information sharing.

Thank you for the opportunity to respond to this consultation. For more information on the work of NICVA I can be contacted at 9087 7777 or at jonny.currie@nicva.org.

Regards

Jonny Currie