



Advice NI response to the

Utility Regulator's consultation on the implementation of energy supplier codes of practice

Deadline 28th July 2014

Amended 30th September 2014

Background

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. Advice NI exists to provide its members with the capacity and tools to ensure effective advice services delivery. This includes: advice and information management systems, funding and planning, quality assurance support, NVQs in advice and guidance, social policy co-ordination and ICT development.

Membership of Advice NI is for organisations that provide significant advice and information services to the public. Advice NI has over 65 member organisations operating throughout Northern Ireland and providing information and advocacy services to over 150,000 people each year dealing with over 270,000 enquiries on an extensive range of matters including: social security, housing, debt, consumer and employment issues. For further information, please visit www.adviceni.net.

Presently, Advice NI manages the Department of Enterprise Trade and Investment's (DETI) money and debt programme. Debt Action NI has been operating since 2009. Since then the project has helped nearly 17,000 people deal with over £263 million in debt. Over 11,200 of these clients and nearly £163 million of debt were dealt with by the new integrated Debt Action NI service which has been operating across NI since August 2012. The new service offers a number of access points and integrates telephone, face to face and web based advice services. For further information, please visit www.adviceni.net or www.debtaction-ni.net.

Q.1

Do respondents agree that customers and suppliers will benefit from a consistent approach to interpretation of the licence conditions?

Advice NI agrees that both customers and suppliers will benefit from a consistent approach. We agreed with all the points raised in the consultation paper, that it will avoid confusion, increase the quality of supplier's services and ultimately increase confidence within the sector. It will provide a recognised basic standard of service that customers can expect and will help clarify expectations by providing a better understanding of processes.

Q.2

Do respondents believe that the minimum standards guidance for Codes of Practice is the right approach? Please provide supporting information and evidence for your response.

Advice NI's believes that the approach outlined in the consultation is the right approach. We believe that the approach allows for creativity among suppliers and may encourage them to strive to provide a superior service over and above the minimum standard. We believe that the standards should be monitored to ensure that suppliers are adhering to them. It is important for commercial companies to remain competitive and enforcing universal codes does not allow for proper competition. We agree that the Utility Regulator (herein called the Regulator) should consult in the future if there are changes in the sector or where best practice is highlighted and should be made a minimum.

Q.3

Do respondents agree that where this consultation has an impact on the groups listed above, those impacts are likely to be positive in relation to equality of opportunity for energy consumers?

Advice NI agrees that by mandating a minimum standard it will benefit all customers.

Q.4

Do respondents 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.

Advice NI provides front line advice services and we have learned that people's circumstances can make them vulnerable. We agree the groups outlined can make people more susceptible to vulnerability, while providing blanket information on certain groups may be useful but it does not mean everyone within that group is vulnerable. Therefore it is essential suppliers provide training to their front line staff to identify where someone falls outside a group to ensure that no-one is over overlooked. Some examples include the working poor, young people, young people leaving care and foreign nationals. Some may not have the capability to engage, or their overall situation has become too complex or they lack the confidence to negotiation with suppliers. Therefore we would suggest that vulnerability should always been assessed on circumstances.

Q.5

Do respondents agree that the effective monitoring of Codes of Practice is essential? Are there any additional areas that should be covered in relation to monitoring, reporting and compliance?

Advice NI believes that effective monitoring of the codes is essential. As technology develops the Regulator may want to consider strengthening the ways of gathering evidence, for example, collecting call recordings, text messages, virtual chat text and other digital media information. We believe the Regulator could carry out further more robust checks on suppliers by onsite visits – both announced and unannounced, shadowing and listening to calls and mystery shopping. This will ensure that the suppliers are providing excellent care to customers.

We believe that suppliers should review customers' circumstances at least annually, through bills, repayment history and speaking to the clients to ensure they are on the best tariff for them. This will help prevent customers getting into difficulty and may help instil confidence within the sector. This could be evidenced through indicator number 6 - Services Offered.

We believe supplier evidence would be improved for Indicators 11-16 if there was text to accompany the statistics, this would help identify the steps taken to support these customers. This would be an opportunity to assess good and bad practices.

Under indicator 16, it would be useful for suppliers to provide information on the number of payment adjustment request they turn down and the reasons for this.

Although indicator 17 relates to disconnection, they are very two different set of circumstances and therefore could be split into two separate indicators; 1) Disconnections for debt and 2) Number of disconnections for tampering.

Under indicator 18, we would like to see the suppliers providing information about those who self-disconnect.

Advice NI would like further consideration given to collecting other measures per annum including – number of court actions against customers, number/amount of fines issued against customers, number of forced recovery rates in operation on customers and the amount of disputed debt.

Under indicator 19, we think it would be important to identify what advice organisation the supplier has referred too.

Under indicator 20 we believe that the Regulator should review a percentage of each supplier's complaints to ensure that they are upholding the procedure correctly. We also suggest that the Regulator would want to see a report on the final outcomes of the complaints.

Q.6

Respondents are asked their opinion on the proposed banding for Indicators 11 and 12, Customer Debt. Some price controlled suppliers already collect and submit information at this level of detail. Respondents are asked if it is appropriate for non-price controlled suppliers to also provide information at this level of detail. We would ask respondents to provide supporting information and alternative suggestions.

Advice NI would suggest lower banding to categorise debt, for example £0-249, £250-499, £500-749, £750 - 999 and £1000+. This would give a better insight to the extent of debt and may help suppliers identify serious debt issues quicker. When customers come to our services they are usually in crisis, our Debt Action NI service average electricity debt is £719 per agreement and gas is £1,222 per agreement. If suppliers are able to identify arrears earlier and refer to money and debt advice giving agencies it would avoid debts becoming serious issues.

We agree with the banding outlined in Indicator 12 as this will determine how long someone is in arrears and how many clients are in long term debt.

Q.7

Respondents are asked their opinion on what monitoring information should be published. We would ask respondents to provide supporting information on their proposal and be mindful of customer transparency as part of their response.

Advice NI believes that all top level information (as described in each indicator) should be published annually with a general overview provided on the content. At no time should an individual be identified from information published. Where the Regulator carries out an investigation, we believe that a report should be published by the Regulator describing the area of concern, with detailed findings of the investigation and the actions the supplier has taken to rectify the situation. Again, no individual customer or case should be identified from this report.

Q.8

Respondents are asked to provide information in relation to changes in practice which may be required. In particular we will take into consideration appropriate evidence in relation to costs and benefits. It will be most beneficial if responses regarding changes in practices and associated costs and benefits first state the individual Code and particular

requirement in question, secondly set out why the change in practice is required, and thirdly set out any evidence regarding costs and benefits linked to the change in practice.

No comment

Q.9

Do respondents think that the publishing requirements outlined cover all relevant areas? Are there any further comments that respondents have with relation to publishing Codes of Practice?

Advice NI would strongly suggest that a notification of any changes to supplier codes of practice should be sent to, at the very least, the regional membership bodies that can disseminate information quickly to their members. Advice giving organisations cover a wide range of issues and may not be aware of particular changes happening in the sector. A notification could be sent via email, either with the new code of practice attached or a link to it on the website. This would be cost effective, efficient and will increase awareness of any future changes.

We would also suggest providing the codes of practice in different language formats for those where English is not their first language. Or at the very least a referral to an appropriate advice giving agency that can provide the required level of support for those customers.

Q.10

Do respondents think that the section of the Code in Annex 1 relating to identifying customers in difficulty covers all relevant areas? Are there any further comments that respondents have with relation to identifying customers in difficulty?

Under point 1, Advice NI agrees that suppliers should form relationships with advice giving agencies and we welcome the inclusion of section 75 organisations. However, we believe there is a need to define what is meant by '*form a relationship*' - does this mean a signposting or referral relationship. We believe this level of detail is needed to avoid confusion or misinterpretation by suppliers which may lead to inconsistency in customer service. We would suggest that Lifeline is included under point 1. They provide immediate crisis help for those to feel suicidal or who want to self-harm. This will provide support for the customer and the supplier who can be confident that those particularly vulnerable will be supported when they need it most.

We feel, under point 2 that suppliers should review their advice giving organisations contact list at least annually, to ensure that it is relevant and up-to-date.

We suggest that point 6 and 12 could be merged into one. We believe that all customers identified as being in difficulty or in debt should be firstly offered a direct referral to a money and debt service, like Advice NI's Debt Action NI. This service offer free, independent and impartial advice and will take immediate steps to assess the persons overall financial situation, provide options and ultimately find a solution to help them take back control of their finances. We feel this is paramount for any customer who is in financial difficulty. The referral should be voluntary and if a customer does not want to be referred the supplier should then offer the contact details to the customer (i.e. signposted). It has been our experience that simply signposting a customer to another service is not as effective as offering a direct referral. Where a direct referral is offered the uptake is much higher and the customer is more willing to engage. Our Debt Action NI service will look holistically at the customer's needs and where appropriate we will refer them to other voluntary and community organisations. Advice NI is the regional membership organisation for independent advice giving agencies and we already have strong links to organisations that support section 75 groups.

We agree that training is vital, as outlined in point 7. This training should be provided to all front line staff that has contact with customers. The training should include being able to identify vulnerable customers and to assess their financial situation properly. It should happen at least annually for current employees and immediately for all new employees. We would also encourage different teams to interact regularly to discuss identifying vulnerable customers and openly review case studies to encourage best practice across the organisation. Each supplier should utilise their information management systems so that if one team identifies a vulnerable customer is relied to other teams so they can adjust their service to that customer. The training should include information about the voluntary and community sector in Northern Ireland, so that suppliers can refer/signpost accordingly.

Q.11

Do respondents think that the section of the Code Annex 1 relating to payment arrangements and monitoring covers all relevant areas? Are there any further comments that respondents have with relation to payment arrangement and monitoring?

Advice NI believes that every customer who is having payment difficulties should be treated as an individual and any repayment agreement should be solely based on their particular circumstances. We do recognise there are certain groups that are deemed as vulnerable, such as those outlined in the consultation but not everyone within these groups will be vulnerable. It is our experience that every customer is different and will present with different circumstances and issues. For example the working poor, those who are in employment but cannot stretch their finances until their next payday; people who are capable but due to their circumstances they lack the confidence to deal with their finances; and people who lack the capability of understanding their situation fully. We would

advocate that suppliers deal with each customer individually based on circumstance instead of pigeon holing customers into groups, as some customers may fall through the net.

We strongly advocate using the common financial statement (cfs – for further information click on this link <http://www.cfs.moneyadvicetrust.org/>) to assess a customer's full financial situation. This is a trusted, industry accepted tool that assesses income and expenditure. This should be the starting point for dealing with any customer who is experiencing difficulties. Advice NI has been using this trusted tool for years and we would be happy to provide training to suppliers on the cfs.

Under section d, we believe that it is vital to have reviewing triggers. Our experience is that 3 months would be to touch based and ensure everything was working for the customer. We then would review a case after 12 months to ensure nothing has happened and that the customer is continuing to cope. If there is a failed payment it would trigger our advisers to engage with the customer again to review the situation. We feel suppliers should enact similar processes to support those who are financially vulnerable.

Under section e, there are certain circumstances the creditor should consider writing off debts, for example, customers with severe mental health issues, extreme financial hardship or where the debt accrued at no fault of the customer.

Our Debt Action NI service is currently dealing with a single parent of 2 young children. She has severe mental health issues and in receipt of benefit including DLA. The client has a gas debt of nearly £3,000 to a gas supplier, who are threatening disconnection. Her typical monthly bill is over £600, she was not offered any energy efficiency advice by the supplier. The customer has never heard of a care register. This supplier does not offer prepayment meters or payment cards. The supplier will not guarantee they will continue to supply her if she applied for a Debt Relief Order. The client is now facing the decision to move from her home. This example highlights how quickly debt can escalate for a vulnerable person. Better monitoring by the supplier could have prevented this situation.

Under section h, we agree that repayment periods should be based on the customer's ability to repay. There should not be any set time lines in recovering debt. We recognise that it may be harder to engage with customers with a prepayment meter, however we do not believe setting a blanket policy to retrieve a percentage of prepayment meters top up is appropriate. We believe the current cap of 40% is extremely high considering the customer has gone into debt. Every effort should be made to contact the customer to set an agreed level of repayment. Where a percentage of repayment needs to be established we believe it should be set at a lower amount of 10%. According to Consumer Focus' 2010 report, *'Cutting back, cutting down, cutting off'* people using prepayment meters were typically low

income households with many experiencing health/disability issues. The lower figure could be used temporarily until proper repayments have been agreed.

Our Debt Action NI service is helping an electricity supplier customer, who was caught tampering with his meter. He is currently in receipt of benefits; he has physical and mental disabilities. He moved to the supplier a year ago and has accrued £800 in debt through meter tampering. Budget classifies this as unbilled consumption therefore considers him outside the current codes of practice. The supplier set repayments at 60%, and wanted the arrears paid within 12 months. Repayments failed and the supplier cut the clients electricity supply off. The client approached our service after a number of weeks the supplier reinstated the electricity. Now the client has to pay an upfront fee of £100 plus £100 per fortnight, which he is getting help from family, and repayments are set at 60%. This is still unmanageable and the client is now relying on family and friends to pay for his energy.

We are aware that many suppliers take this stance with meter tampering cases. Advice NI does not condone fraudulent behaviour. However, we believe that any repayment should be assessed on what the client can actually pay otherwise the repayment will continue to fail and some may be forced into further hardship and even disconnection.

Although it is recognised that there is no disconnection threat for domestic electricity customers, the fact that suppliers can force installation of a prepayment meter, fine a customer and recover a debt at a rate of 40%, can effectively mean a customer is financially disconnected even though not physically.

All options and tariffs should be explained to the customer so they can make an informed choice on how to best deal with their debt. Repayment agreements should never be imposed or dedicated upon a customer but it should be a negotiation between both. The only exception would be where a customer refuses to engage, either themselves or through a third party.

Q.12

Is there any further information you wish to provide in respect of Fuel Direct or Third Party Deductions?

We would advocate Fuel Direct or Third Party Deductions only where it is appropriate for the customer and with their consent. We believe the amount of deduction would need to properly assessed to ensure the customer can afford it in the long term, as it is widely recognised that people on benefits have little to no disposable income to service debts. Any case study highlighted in this response could potentially have been helped if they were offered Fuel Direct has an option to repay debt.

Q.13

Respondents are asked for their opinion on the proposals for disconnection and reconnection fees. We would ask for supporting information on any comments made.

Advice NI believes where a customer has been disconnected due to serious financial hardship then suppliers should waive the reconnection fee as this will only compound the debt problem. Every effort should be made before disconnection to support the customer by exploring better options available and what else can be done to support them. All customers in debt, especially if they face disconnection, should be offered an independent referral to a money and debt advice giving agency.

We would strongly oppose anyone in financial difficulty having to pay 40% rather repayments should be based on individual circumstance.

Q.14

Do respondents think that the section of the Code in Annex 1 relating to methods and procedures to avoid disconnection covers all relevant areas? Are there any further comments that respondents have with relation to identifying customers in difficulty?

We believe suppliers should evidence the steps they have taken to engage with customers, especially those facing disconnection. This should detail the number of attempted contacts and the various methods they have used to try and engage the customer. Customers who are in debt often do not answer their phone or open correspondence. Therefore other method such as text, email etc. may be more appropriate. The preferred methods should be agreed and discussed with the customer prior to getting into difficulty.

Q.15

Do respondents think that the section of the Code in Annex 1 relating to providing accurate and timely bills covers all relevant areas? Are there any further comments that respondents have with relation to providing accurate and timely bills?

Advice NI would like to see suppliers investing in technology where onsite meter reading ceased. That all information could be easily gained through monitored usage and in circumstances where there are concerns then an onsite visit would be warranted to assess the situation.

We believe no customer should have to pay for suppliers errors when billing. The only exception is where the customer should have undoubtedly realised an error was being made. In these circumstances the onus would be on the supplier to prove without doubt the customer should have been or was aware an error was being made.

The OFT (Office of Fair Trading) is now defunct and was replaced by the FCA (Financial Conduct Authority).

Q.16

Are there any other areas which the Code on Payment of Bills should cover?

Advice NI would like to see within the Codes of Practice a statement outlining that suppliers should negotiate directly with third party advice giving organisations where customers have indicated their authority. This should only cease when the third party informs suppliers they are no longer working on behalf of the customer or where there are a number of failed contact attempts.

We agree that all suppliers should develop and proactively promote care registers. We believe that customer should also be used to assess for financial vulnerability. Our Debt Action NI service is working with an electricity customer who has accumulated arrears of approximately £3,000 since her husband left. The client is in receipt of Jobseekers Allowance and has four dependent children. Client was repaying her debt at a rate of £70 per fortnight. The supplier is no longer accepting this level of repayment. They have demanded she pay an upfront fee of £1,000 and £100 per week thereafter. The client simply cannot afford this and has come to us for help. She has requested a prepayment meter and was told her property was unsuitable for installation.

Supplier's information management systems should easily indicate when someone is deemed vulnerable, which all front line staff should have access too. If negotiations are ongoing with advice giving agencies and they can demonstrate the customer is vulnerable then it should be accepted as such.

Q.17

Do respondents agree that a consistent definition of debt across suppliers, for the purpose of the Code of Practice on the Payment of Bills, should be established?

Yes, we agree that there should be consistent definition of debt across suppliers. When a customer has not paid in time then it should trigger the supplier to begin engagement.

Q.18

Respondents are asked their opinion on the proposed definition of debt with regards to the Code of Practice on Payment of Bills or suggest an alternative definition which may be used across all suppliers. We would ask respondents to provide supporting information as to why a specific definition would be appropriate and be mindful of monitoring procedures as part of their response.

We believe that customers should be allowed a minimum of 30 days before being deemed in debt. This corresponds with the bands outlined in reporting indicator 12. It also allows customers who get paid monthly time to pay their bill. Also potential welfare reform changes mean that benefit payments may move to monthly payments. The proposed definition could be translated to mean different things as each supplier will have different terms and conditions therefore supplier information cannot be cross compared. The question would be – Is debt assessed after the first bill is issued, after the warning letter or when the default notice is issued? We believe the proposed definition is too board, therefore propose the following,

“A customer will be deemed in debt were any amount remains unpaid for 30 days after the supplier’s first bill is issued.”

This should trigger the supplier into action by trying to contact the customer as early as possible.

Q.19

Respondents are asked to provide any additional comments on the attached draft Code minimum content, which they feel will help to improve the Code.

Refer to Q.16, the addition of a statement for suppliers to recognise and negotiate with third party organisations as detailed in the new FCA handbook.

Q.20

How could suppliers monitor self-disconnection and self-rationing in prepayment customers?

The use of prepayment meters is increasing. According to the Department of Energy and Climate Change statistics, in Northern Ireland at the end of 2012 there were approximately 293,000 electricity prepayment meters and approximately 105,000 gas prepayment meters in Northern Ireland (Fuel Poverty Monitoring Indicators; 2013). From same report in 2011 this shows a 14% increase in electricity meters and 44% increase in gas meters. According to Consumer Focus’ 2010 research report *“Cutting back, cutting down, cutting off”* most households with prepayment meters will have low incomes or in receipt of benefits. The research found that over half will have rationed their budget to pay for energy, with 54% used the emergency facility and 16% disconnected. Suppliers should use this metering information to identify and engage with those households who are using the emergency facility. Perhaps it could monitor how often and long a household is disconnected and prioritise accordingly.

As prepayment meters reduce the number of contacts with the customer, suppliers should write out annually to highlight how to best use the meter, what to do if there are problems, energy efficiency measures and information on advice giving organisations. Where a customer is in debt, then contact should be increased to quarterly to inform them of the amount of debt, repayment agreements, length of time to repay the debt, emergency information, latest tariff information and information about advice giving organisation.

Customers who are in difficulty or default should be placed on the lowest tariff until their circumstances improve. When a customer tops up at one rate then this rate should continue to apply even when new tariffs are introduced. The new tariff should only be charged when the next top up is made.

Better warning technology should be implemented on prepayment meters when it is running low of credit.

Q.21

Do respondents think that the section of the Code in Annex 2 relating to the services provided covers all relevant areas?

Advice NI would like energy efficiency measures to be included in the list for alternative communication formats, under section b. Depending on their condition, customers in this group will tend to use more fuel and therefore every measure should be taken to ensure they are on the correct tariff for them and they and/or carer should be given energy efficiency information to help reduce costs.

Under b we would like to see signposting and referring to other voluntary and community organisations to support people where appropriate.

Q.22

Do respondents think that the section of the Code in Annex 2 relating to disconnection of Customers who are of pensionable age, disabled or chronically sick cover all relevant areas? Are there any further comments that respondents have with relation to disconnection?

Advice NI believes, under point 1 no identified vulnerable customer should knowingly be disconnected, including those who are financial vulnerable. If a customer has been disconnected then they should be reconnected as soon as possible with no charge.

We believe point 2 could be strengthened by including unexpected cold weather and floods. Again we would advocate assessing the person's ability to pay before any disconnection occurs at any time throughout the year.

Q.23

Do respondents think that the section of the Code in Annex 2 relating to raising awareness of service provision covers all relevant areas? Are there any further comments that Respondents have with relation to awareness raising?

In addition to the information outline in section d, we think it would be important to explain to customers what happens to their information once they have been identified as applicable for inclusion onto a care register. In our experience we know that vulnerable customers, especially those with mental health, will not readily convey such information as they believe it will negatively impact in future negotiation with creditors. Therefore, suppliers should outline what happens to someone's information when they are placed on a register, how it will benefit the customer and offer reassurance that it will only aid any future engagement and not be shared with other organisations.

We also believe that trust third party organisations, especially advice giving agencies, should be allowed to place customers on the register where the customer has given their consent.

Q.24

Are there any other areas which the Code of Practice on provision of services for persons who are of pensionable age or disabled or chronically sick should cover?

No further comment

Q.25

Do respondents agree that a consistent definition of a complaint for all suppliers, for the purpose of the Code of Practice on Complaints Handling Procedure, should be established?

Yes we agree a consistent definition should be established

Q.26

Respondents are asked their opinion on the proposed definition of a complaint with regards to the Code of Practice on the Complaints Handling Procedure or suggest an alternative definition which may be used across all suppliers. We would ask respondents to provide supporting information as to why a specific definition would be the most appropriate and be mindful of monitoring procedures as part of their response.

We propose the following definition,

"The expression, through any channel including recognised third parties, of a customer's dissatisfaction"

We feel it is important to include third party advocate/organisation that has consent to act on a customer's behalf.

Q.27

Do respondents think that the section of the Code in Annex 3 relating to the accessibility of complaints handling procedures covers all relevant areas? Are there any further comments that respondents have with relation to accessibility?

All customers facing staff should be trained in how to deal with an expression of dissatisfaction promptly and accordingly. They should offer to transfer or take details of the initial complaint and raise it through the appropriate channels and explain clearly to the customer what the next steps will be. The customer should not be given a separate number to call. If a customer wants to speak to a supervisor or manager this should be accommodated, the member of staff should provide the managers name and if not available the managers contact details. Often potential complaints can be dealt with quickly if the customer feels they have received good customer service were they have been listened too and taken seriously.

Complaint procedures should be provided in different formats if requested by a customer including different languages, fonts, braille etc.

Q.28

Do respondents think that the section of the Code in Annex 3 relating to the transparency of complaints handling procedures covers all relevant areas? Are there any further comments that respondents have with relation to transparency?

No further comment

Q.29

Do respondents think that the section of the Code in Annex 3 relating to the promptness of complaints handling procedures covers all relevant areas? Are there any further comments that respondents have with relation to effectiveness?

No further comment

Q.30

Do respondents think that the section of the Code Annex 3 relating to alternative dispute resolution covers all relevant areas? Are there any further comments that respondents have with relation to alternative dispute resolution?

No further comment

Q.31

Are there any other areas which the Code of Practice on Complaints Handling Procedure should cover?

In addition, we believe that the suppliers should publish high level information about the type of complaint received and what was the outcome of the complaint.

Q.32

Do respondents have any comments to make on the proposed industry standard to update prepayment meters for a change in tariff? Do respondents have any comments to make on how customers can be informed to ensure they understand this process?

Advice NI believes that it is only fair to allow those customers who purchased fuel at a lower tariff to use it at the lower rate, before introducing a new higher tariff. The new tariff should only be introduced once the customer tops up again.

We further believe prepayment meter customers should be notified one month before the change in tariff. This will allow those who top on monthly to adjust for the change. It is important to be mindful of new potential welfare reforms that will change benefit payments to monthly payments.

Q.33

Do respondents think that the section of the Code in Annex 4 relating to the information provision covers all relevant areas? Are there any further comments that respondents have with relation to information provision?

Under point 6 we would like to see add, reassure the customer that all debt recovery will be appropriate to their particular circumstance and offer a referral to a money and debt advice giving agency.

Q.34

Do respondents think that the section of the Code in Annex 4 relating to the suitability of a prepayment meter covers all relevant areas?

Where advocating telephone only service we would strongly suggest these are free phone numbers or at the very least charged at a local rate.

Q.35

Do respondents think that the section of the Code in Annex 4 relating to payments for prepayment customers covers all relevant areas? Are there any further comments that respondents have with relation to payments?

No further comment

Q.36

Are there any other areas which the Code of Practice on Services for Prepayment Meter Customers should cover?

We believe that under section e point 3, this greater level of emergency credit should be extended to those deemed financially vulnerable and have a history of self-disconnection/using emergency credit.

Contact information on this consultation response:

Bob Stronge (Chief Executive)

Sinead Campbell (Head of Money and Debt Services)

Kevin Higgins (Head of Policy)

Advice NI

1 Rushfield Avenue

Belfast

BT7 3FP

Tel: 028 9064 5919

Fax: 028 9049 231

Email: bob@adviceni.net

Email: sinead@adviceni.net

Email: kevin@adviceni.net

Website: www.adviceni.net

Website: www.debtaction-ni.net