

Smarter regulation: strengthening the economic regulation of the energy, water and telecoms sectors

Department for Business and Trade

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What are your views on the creation of a single, multi-sector Priority Services Register (PSR)?

We believe there is value in creating a single, multi-sector Priority Services Register (PSR). Reducing unnecessary, burdensome administration for both people at the end of life and those who have recently been bereaved is welcome.

It is positive that the proposal recognises the importance of data protection and consumer control of personal data, both of which should be a priority in the move to a multi-sector PSR. To ensure that consumers retain control over usage of their personal data:

- The PSR sign-up process must include transparent and comprehensible information setting out which service providers their data will be shared with and how it will be used.
- Consumers must have the option to withdraw from the PSR at any point. The withdrawal process should be well-signposted and straightforward to complete.

It should also be easy for consumers to update the PSR to reflect any relevant change in circumstances. For example, an individual could already be signed up to the PSR because they meet one of the qualifying criteria (i.e. they are of state pension age) and may later diagnosed with a terminal illness. It is imperative that service providers have an accurate and up-to-date picture of need, so they can provide appropriate support. Service providers should also have the ability to update information on a consumer's behalf, with the person's consent.

Accessibility must also be central to the single, multi-sector PSR. Vulnerable consumers should not face unnecessary barriers to accessing the support they need. It is especially important that different options (online, telephone and post) are available for consumers to sign-up to and withdraw from the PSR, or to report a change of circumstances.

Lastly, if eligibility criteria and the support offer continue to vary by service provider under a single, multi-sector PSR, every organisation should have a dedicated point of contact for consumers to discuss their options with.

What are the best data sources of vulnerability that the PSR should use? Who should be able to input data?

To increase awareness of the PSR and ensure as many people as possible benefit from the support it provides, individuals should be given information about and signposted to the PSR when:

- They are added to the Palliative Care Register
- They use the Government's 'Tell Us Once' service



Because no one
should face death
or grief alone

- They apply for related benefits such as Bereavement Support Payment or apply for a benefit under Special Rules for Terminal Illness (SRTI)

What vulnerabilities and services should the PSR cater for?

Any household in which somebody diagnosed with a terminal illness lives should be able to sign-up to the PSR.

Marie Curie research estimates that around 150,000 people die at home in England and Wales each year from conditions that are commonly treated with medical devices.¹ It is vital that people at the end of life who are reliant on medical devices are prioritised in the event of power supply issues. It is also important that people at the end of life are supported to keep their homes warm, in order to stay as comfortable as possible.

At present, people with a terminal illness may fall within existing categories of those eligible for the PSR. For example, people of state pension age and those who need to use medical equipment that requires a power supply. However, we believe that the criteria should be extended to include anybody diagnosed with a terminal illness, to cover all scenarios. The sign-up process should include the option to add further detail, such as medical equipment usage, to ensure service providers have an accurate picture of need. As is the current situation, individuals should not be required to show proof of their diagnosis or condition. Additionally, the person with a terminal illness should not have to be the billpayer in order for the household to be eligible.

We welcome recent changes made by Ofgem to broaden the PSR's eligibility to ensure that people are considered based on their circumstances - not just a list of characteristics. For example, UK Power Networks list bereavement as a reason people could get extra help on a temporary basis. This should be adopted in the move to a single, multi-sector PSR and bereavement should be one of the circumstances in which temporary support is available.

An individual should be able to declare when they have faced any bereavement that has affected their finances, this should not be limited to just losing just a partner. Losing different people can affect an individual's finances in a range of ways. For example, losing a member of the household who contributed towards bills, losing a grandparent who provided childcare or having to take time off work to cope emotionally and deal with practical matters.

We would recommend that support is given to bereaved customers for 18 months, given that is the time over which Bereavement Support Payment is paid. Additionally, there is evidence that most households bereaved of a partner reach an equivalised income within 12-18 months of the death.

At present, the support offered under the PSR varies by service provider. To avoid a postcode lottery and ensure consistency of support when people move, providers of the same sector should offer the same range of support options under a single, multi-sector PSR. This should not mean a reduction in the

¹ <https://www.mariecurie.org.uk/globalassets/media/documents/policy/dying-in-poverty/k406-povertyenergyreport-finalversion.pdf>

support offer for some service providers. Rather, it should be the case that service providers extend their support offer to reflect what is offered elsewhere across the sector.

Support should also include signposting to relevant sources of information and resources. In particular, financial advice and support. However, this is also a key opportunity to raise awareness of other types of practical and emotional support which may be of value to vulnerable consumers. For example, people who have recently been bereaved could be signposted to the Government's 'Tell Us Once' service and bereavement support offered by third sector organisations.

How can existing affordability support be better communicated to increase customer awareness?

As outlined above, there are touch points such as, when someone is added to the Palliative Care Register or uses the Tell Us Once service, where people should be signposted to the PSR.

There must be awareness among professionals in sectors such as health and social care on the support that is available so they can signpost relevant people to the right affordability support.

Customer services teams must receive training around bereavement and terminal illness so they can deal with recently bereaved or terminally ill patients in a sensitive and appropriate manner.