

## Your response

Question	Your response
<p>1. Do you have any comments on Ofcom's proposal to publish a guide to help providers treat vulnerable customers fairly?</p>	<p>Confidential? – N</p> <p>SSE welcomes Ofcom's proposal to publish a guide on treating vulnerable customers fairly and the aim to drive up standards. Taking the route of publishing formal guidance should allow individual providers to consider how certain provisions can assist vulnerable customers but also ensure that these provisions are consistent with their wider customer service strategy. This approach also avoids any overlapping or duplicating of regulatory powers where Ofcom already has these held within other general conditions, GC C5 in particular.</p> <p>We would encourage Ofcom to continue trying to strike the right balance to afford providers enough flexibility to encourage innovation in delivering the right consumer outcome, while also ensuring there's enough clarity in the principles to ensure compliance and a good standard across the market. While the guidance refers to specific measures that providers can take, the focus should ultimately be on positive customer outcomes.</p>
<p>2. Do you have any comments on the suggested measures set out in sections 3-7? Please set out your comments on each section separately.</p>	<p>Confidential? – N</p> <p><u>Establishing and publishing policies</u></p> <p>Ofcom is correct in expecting the guide should be used to provide a reminder that a provider's culture is guided by senior leaders while also taking on board feedback from frontline staff. The treatment of vulnerable customers is a responsibility everyone regardless of their role within the organisation.</p> <p>The guidance includes suggestions of policies and procedures being available in different formats. As part of this, Ofcom should also monitor new technological solutions that emerge to provide relevant information to customers. Sharing these details can then assist with providers assessing if they can be rolled out to their own customers as well or whether</p>

their existing systems are compatible. SSE's introduction of Sign Video is one example of a solution that has become available through advances in technology but will also hopefully become more prevalent as well.

SSE has been working since 2013 to embed the principles of Treating Customers Fairly when changing and implementing new processes or projects. The introduction of new products will include completing a Treating Customers Fairly assessment to review how these changes will impact customers. This process ensures colleagues across the business are carefully considering vulnerability and whether any requirements for information or processes need to be considered or adapted.

#### Treating vulnerable customers fairly

SSE agrees that there must be a nuanced approach to providers being able to identify vulnerability. This will not always be possible from the customer explicitly describing themselves as vulnerable or from asking for help. A better approach comes from staff being able to detect indirect triggers of vulnerability and being empowered to serve customers based on their individual circumstances as well. While providers can adapt their approach to identifying vulnerability, the matter should also consider whether there will always be some customers who do not wish to reveal details that would assist in them being identified as being in vulnerable circumstances. This does not reduce the importance of more sensitive detection methods being attempted but Ofcom should consider this when comparing detection rates across different institutions.

The Ofcom guidance correctly notes debt as potentially being an indication of vulnerability. Support and advice (including signposting to relevant third parties) is an appropriate step and this should also be balanced against any perceived threat of enforcement action. However, it is also important that a customer is fully informed of potential outcomes. Rather than removing any reference to debt collection activity, providers should consider how this information is provided to ensure the customer

is fully informed of any potential consequences of non-payment and that this plays a part in them considering the need for any additional assistance.

#### Recording information

There are situations where customers experiencing payment difficulties do not engage with suppliers or grant consent to use their data. Where this is the case, we regrettably are limited to the amount of support we can provide. While providers can make efforts to try and resolve issues of consent and understand concerns, there must be a willingness from the customer to accept help.

These scenarios must figure in Ofcom's monitoring in this area. Similarly, attempts to be pro-active in this area could be considered as intrusive and generate customer complaints.

Providers should also ensure that while capturing information is important, it must also be used as part of an enhanced service provision.

#### Monitoring performance

SSE agrees that monitoring the performance of customer service advisors should cover a holistic view of what good service is and the right outcome for the customer is being achieved. This would include taking a qualitative view of performance and taking initiative to ensure that individual customer requirements are met. Allowing frontline advisors this autonomy should also be used in how an organisation draws upon these experiences. SSE has implemented a 'Fairness Feed' as the way to gather valuable insight from both customers and colleagues on areas where improvements can be made and that can be reviewed to inform customer service policies and procedures.

Engagement with the Fairness Feed indicates that colleagues feel confident in reporting potential issues and that managers empower their teams to use the Fairness Feed to

highlight areas for improvement. We have a network of contacts across each business area who work hard to investigate the issues raised through the Fairness Feed, scope out solutions and deliver any necessary changes.


When considering how different providers achieve these outcomes, Ofcom should remain mindful of the way in which different providers may choose to reach these outcomes in a manner that is specific to their own brand or culture. This may include an approach where training and performance monitoring does not specifically include treating customers fairly or accommodating vulnerability. Instead, monitoring can be based on ensuring the right customer outcome has been achieved. Where this is not achieved, the provider should then review what actions should have been taken and if additional training is needed to help achieve this.

#### Staff training

Ofcom has correctly identified that, in practice, some specialist staff are likely to be more closely, or more frequently, involved in assisting customers in vulnerable circumstances. While all staff should be engaged in the culture of treating customers fairly, knowing that additional support is available should be built in procedures as well. Specialisation of job roles should not result in an absence of the proper consideration of treating customers fairly and identifying vulnerability.

Training to recognise various types of vulnerability triggers and risk factors is based on actively listening to customers and reviewing customer accounts on all customer contact opportunities through means of telephone conversations, letters and emails and face to face interactions.

While SSE agrees that there is a benefit to working with third parties to help deliver more appropriate and specialised assistance, this should come with the understanding from Ofcom that they cannot guarantee the same level of training being provided. The right



balance would be for providers to at least consider the training that an external provider has and whether this is in keeping with their own approach.