Consumer Vulnerability Strategy Refresh: Consultation response summary

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Overview

Consultation Responses

We published a consultation on 10 September 2024 on proposed changes to refresh our Consumer Vulnerability Strategy. We received 67 responses, which we have considered to help shape the final refreshed Strategy.

Contributors

We received responses from a wide range of stakeholders, including consumer groups, charities, government, trade association and a wide range of energy companies (including network operators and suppliers). We have supplemented this feedback by running workshops with suppliers, industry bodies and consumer groups and charities.

We have published the responses in full on [Citizen Space](#) but have excluded those responses that were marked as confidential. Below we have summarised the responses and have set out what changes we have made to the final strategy. In this document, we have followed the structure of the draft strategy and will deal with the consultation questions in the order they were set out in the Consumer Vulnerability Strategy refresh consultation paper.

Consultation questions

Themes, outcomes and our immediate priorities

1. Do you agree that we should not prioritise updating the vulnerability definition?

Overall, majority of the respondents agreed that the updating of the vulnerability definition should not be prioritised. Respondents were supportive of the current definition being deliberately broad which assists in making the definition flexible in capturing a wide range of potential vulnerabilities.

There were also a number of stakeholders who believed the definition could be improved.

Stakeholders from across different groups called for the definition to include financial vulnerability. One supplier noted that it would welcome the broadening and inclusion of financial vulnerability given the rise in consumers experiencing financial difficulty. A number of consumer group and charity stakeholders also supported this call noting that inclusion of financial vulnerability would help suppliers better identify and support consumers facing financial difficulty. They also similarly commented on the external context of rising unaffordability issues which drive the need for financial vulnerability to be specifically defined and recognised in the definition.

A few consumer group and charity stakeholders also called for the definition to also go further to capture the growing and changing pressures of consumers across the UK which can impact the extent to which individuals may become vulnerable.

Other stakeholders also asked for a closer mirroring of the Financial Conduct Authority (FCA) definition of consumers in vulnerable situations. One called for specifically the FCA's four characteristics of vulnerability (health, life events, resilience, and capability) to be adopted.

Our response

We remain of the view that our definition should remain intentionally broad, to ensure that the energy sector focuses on all aspects of vulnerability. Although we acknowledge the calls for inclusion of financial vulnerability, we consider that any financial specific vulnerability definitions are best placed to be focused on as part of ongoing workstreams, such as the affordability and debt workstreams within Ofgem and

government, particularly when considering eligibility for targeted support. As such, our decision is to retain the existing vulnerability definition.

We have restated relevant, consolidated, guidance on the vulnerability definition, risk factors of vulnerability and our expectations on identifying and supporting consumers in vulnerable situations for ease of reference within the Strategy.

2. Do you agree with our proposals to retain the five themes?

There was broad consensus across stakeholder groups that the five themes should be retained alongside agreement on the tighter and narrower focus of refreshed strategy. Stakeholders were also supportive of the focus of the themes.

Some network operators called for improvements to existing themes through greater details on the role and expectations of network operators within the themes. One stakeholder in this group mentioned Theme 2 (Supporting customers struggling with their bills) could have greater recognition of the role and work of network operators on Priority Services Register (PSR) and identification of consumers in vulnerable situations and their needs.

Network operators and consumer groups and charities particularly supported better use of smart data, data-sharing and improvements on the PSR. They agreed on the importance of greater data sharing in the identification of consumers in vulnerable situations. However, one consumer groups and charities stakeholder cautioned that data-sharing must happen in a way that does not threaten consumer trust.

A few stakeholders commented that themes could be more specific and refined. One suggested that Theme 2 (Supporting those struggling with bills) could go further in being more proactive in the prevention of consumers falling into debt.

A few stakeholders also commented on improvements upon Theme 4 (Innovation). They noted that additional embellishments would be helpful in drawing out the theme. There were also suggestions in this theme of better centring consumers in vulnerable situations within innovation as well as recognition that consumers in vulnerable situations are not left behind as the energy transition happens.

Our response

We have made clearer within the Strategy the distinction between our expectations related to working with others to solve issues across sectors for suppliers and network companies. This aims to help with clarification and understanding of the outcome itself

and give greater focus on getting the right solutions for immediate challenges and on our key priorities.

We also made amendments to some wording included in theme 4: Encouraging positive and inclusive innovation, to provide greater clarity on our intention to ensure that customers in vulnerable situations who are unable/unwilling to adopt new technologies remain protected. Additionally, we made amendments to be more specific about how we will work with partners across sectors and greater detail to showcase the links between the ongoing Consumer Outcomes work and Debt Outcomes work and our role within that.

Our planned work to support the Department for Business and Trade (DBT) with their proposals for a Share Once Support Register (or multi-sector Priority Services Register) across energy, water and telecoms is currently paused while DBT consider their next steps. We continue to work with government and others on broader data sharing initiatives that support improved identification of consumers in vulnerable situations.

3. Do you agree with our proposal to retain 'working with partners to solve issues across multiple sectors' as a cross-cutting theme?

There was strong consensus across different stakeholder groups that 'working with partners to solve issues across multiple sectors' should be retained as a cross-cutting theme.

One of the most common examples mentioned in support of this theme across consumer group and charity stakeholders, suppliers and network operators were on data sharing possibilities. Examples included PSR work, data sharing with government and a multi-sector PSR.

Stakeholders also suggested several improvements which could be made. A number of consumer group and charity stakeholders called for a more 'bottom up' approach which included lived experiences more. Suggestions included utilising lived experiences to inform decisions and also embedding it within a core design team.

Consumer group and charity stakeholders, one network operator and one stakeholder also called for more detail on how Ofgem will go about working with partners. They were keen for measures to monitor this theme such as setting outcomes or work programmes to accompany the theme to further promote transparency.

Two suppliers called for additional detail on partners within the theme. One supplier called for partnerships to also include stakeholders such as housing associations, the NHS and Consumer Champions in the referral/signposting space and another supplier suggested the inclusion of government within the list of partners.

Our response

We are retaining 'Working with others to solve issues that cut across sectors' as a cross-cutting theme. We agree that there are a number of ways to operationalise and support the success of this theme through work plans and collaborative action by working together with stakeholders across industry.

We will continue to build and strengthen our working relationships with stakeholders across all relevant parties, and we have included a broad list of stakeholders we work with in Section 2: Theme 5 of the Strategy, including government. It should be noted this list is not exhaustive, and we welcome and encourage engagement from all stakeholders.

We also recognise that it is challenging to measure the progress and success of this theme, however, we expect the success delivery of ongoing work to positively influence progress and success of the outcomes within the theme of 'Working with partners'.

Theme 1: Improving identification and smart use of data

4. Do you agree with our proposed outcomes?

The majority of stakeholders agree with the proposed outcomes for Theme 1 (Improving identification of vulnerability and smart use of data) and the aims to improve data sharing and identification of consumers in vulnerable situations. For example, stakeholders across the different groups were supportive of a multi-sector Priority Services Register (PSR) and increased data sharing between different groups – such as local authorities and the Government.

However, stakeholders also had a number of suggestions on how the outcomes could be improved.

One consumer group and charity stakeholder commented that the PSR doesn't identify/capture those who are suffering from energy deprivation. This means some individuals with dangerously low usage will not be captured. Another commented that it

is important that if consumers are expected to update firms on their needs and circumstances that guides and information on energy company websites are accessible.

Several suppliers commented on the PSR and the need for greater data matching with Government. They also noted that the PSR is not always used for its original intent and some suggested that the PSR's classification of vulnerabilities may need to evolve. They also noted that the PSR is not always used for its original intent, notably to protect consumers when there is an interruption to supply, and some suggested that the PSR's classification of vulnerabilities may need to evolve.

Network operators felt that the outcomes could have additional details on the role of network operators in the sector who support customers.

Our response

We agree that it is important to progress work on improving data sharing and identification of vulnerability. We proposed in our Draft Consumer Vulnerability Strategy Refresh to scope discovery work on whether a review of the Priority Services Register was required. We have decided to pause immediate work on the PSR in order to prioritise our work in delivering our Debt Strategy; to reset the debt which has built up, raise debt standards, and prevent debt build-up.

We agree that it is important that consumers in vulnerable situations who are experiencing energy deprivation and/or self-rationing/self-disconnecting from their energy supply are identified in order to receive support. Government, who are responsible for Fuel Poverty policy, have published a review of the 2021 Fuel Poverty Strategy and consultation on a new strategy to deliver warm homes, committing to retain focus on effective targeting of vulnerable households and seeking opportunities to make improvements to data sharing. This includes seeking views on how to improve targeting and identification of fuel poor households, those with extremely low energy usage, and alternative eligibility criteria for support schemes.

We also agree that it is important for information on supplier websites to be accessible. Energy UK's Vulnerability Commitments aim to drive continuous improvement based on three key principles: accessibility, collaboration and innovation. 14 suppliers have signed up to the Commitment, which covers around 95% of the market in GB, and in 2023 a new sub-commitment requiring signatories to drive continuous improvement in digital accessibility was added. Signatories must make it as easy as possible for customers in vulnerable circumstances to disclose relevant information, and to access the most suitable additional support, including through websites.

5. Do you have any comments on our definitions of success or metrics to monitor progress and delivery of the outcomes?

Stakeholders were generally welcoming of the definitions of success and metrics to monitor progress. There was broad support from different stakeholders for a single PSR register which operates across sectors, broader data sharing and smarter use of data.

Suppliers particularly expressed support for the definitions of success and metrics, they were welcoming of the mention of AI to support innovation in this area.

However, different stakeholders suggested improvements and provided feedback on the granularity of the success definitions and metrics.

Some stakeholders in the consumer group and charities group, supplier group and some stakeholders from the 'other' group expressed concerns over the use of the take up of the PSR as a metric of success. Whilst they acknowledged that it can be a helpful way to measure awareness of support, there are concerns that it does not adequately demonstrate the quality of support individuals receive. One network operator also expressed concern on the term 'awareness', posing a question on the level of depth assumed.

On metrics to measure the quality of support consumers receive, one consumer group and charity stakeholder suggested that tracking the outcomes of those on the PSR might be helpful whilst one supplier and one consumer group and charity stakeholder suggested development of a more sophisticated PSR is needed. Traditionally the PSR was set up to focus on loss of supply, a more sophisticated PSR can better capture data of granular vulnerabilities and better identify if customers are receiving support and services suited to their specific situation.

One supplier also commented that metrics should be broadened beyond just PSR, for example metrics to examine progress on consumer trust in suppliers earned through fair pricing and good customer service, improved data sharing between suppliers and the Government, and innovation in customer service towards easy access to bill support beyond identification of consumer on the PSR. The stakeholder said that these tools could help consumers receive support more suited to their needs.

Similarly, consumer groups and charity stakeholders were also keen for more granular metrics to monitor success. For example, one stakeholder suggested inclusion of metrics beyond PSR, specific metrics focused on challenges disabled consumers face, accessibility and awareness of support and challenges of rural consumers.

Additionally, consumer groups and charities stakeholders and stakeholders in the 'other' group also expressed concerns around disclosure and the perception of the PSR for physical needs only. There is worry that it could become an additional barrier to take up. For example, one consumer group and charity stakeholder noted that the PSR is still not seen as something that will provide support for those with mental health problems. Hence, there are concerns that without a change in perception of what the PSR is it will impact take up.

Our response

We are working to understand how to best expand our existing data collection activities to cover more granular vulnerability data effectively. We will also consider what, if any, additional research is required to help understand consumer views on individual projects that support delivery of our workstreams and the Strategy. We will also require GDNs to separately report on their Customer Satisfaction Survey and Complaints Metric performance for customers on the PSR.

The intended purpose of the PSR was to identify and support people who might need additional assistance during energy disruptions, such as those with health conditions, young children, or reliance on medical equipment. The PSR has long been used as a proxy for identifying consumers in vulnerable situations. However, with limited/specific needs codes, relevant to safety and off supply situations, many circumstances or characteristics are not captured by the PSR.

We will continue to consider our work in this area and where improvements can be made.

Theme 2: Supporting those struggling with bills

6. Do you agree with our proposed outcomes?

The majority of stakeholders across all groups broadly agreed with the proposed outcomes aimed at supporting consumers struggling with bills. However, there were calls for greater clarity and more specific details, especially regarding how suppliers and other industry participants can intervene earlier and tailor support to individual circumstances.

Consumer groups & charities were in general agreement with the outcomes with several CG&C stakeholders emphasising the need for more specificity in addressing the needs of particular vulnerable groups, for example, disabled individuals.

Some also called for preventative measures for before customers become indebted. For example, early engagement, energy management tools, and accurate billing.

These stakeholders also highlighted the importance of data. For example, referencing FCA requirements for financial early intervention strategies to help identify at-risk customers and offer appropriate support.

Four suppliers were broadly supportive of the outcomes but sought further clarity on the scope and meaning of certain terms. Some examples given included flexible payment methods and frequencies, consistent support and billing accuracy vs. affordability. Some noted that some consumer complaints stem from affordability concerns rather than simple billing errors.

Several suppliers also proposed exploring more meaningful support measures, such as a government-funded social tariff, and collaborative approaches between Ofgem and suppliers for consistent implementation.

Network Operators primarily focused on the technical feasibility of supporting consumers in vulnerable situations, though explicit feedback on these proposed outcomes was minimal.

Respondents in the others category also agreed in principle with the outcomes but called for greater clarity. For example, they said support must be tailored to individual circumstances to avoid ambiguity in definitions of "consistent" or "uniform" support. Furthermore, they would like clearer guidance on how to operationalise these outcomes effectively.

Our response

Supporting and protecting consumers in vulnerable situations is a key priority for Ofgem. It is clear in our statutory duty that we need to consider the interests of individuals who are disabled or chronically sick, of pensionable age, with low incomes, or residing in rural areas. Ensuring that the market delivers positive and fair outcomes for consumers who are struggling to engage cuts across all of our functions. We continually measure and assess how changes to policies can affect consumers, including consumers in vulnerable situations using distributional analysis of consumer archetypes, helping us understand the different needs of different energy consumers.

While we acknowledge the importance of preventative measures prior to consumers building up debt, we are minded that this is best addressed through individual work plans rather than the outcomes themselves. As part of the Debt Strategy and wider Consumer Confidence work programme we are committed to raising standards for consumers in debt and arrears. We will also continue to work with government on options to help consumers in debt and arrears including delivery of a Debt Relief Scheme.

We made some amendments to the wording of the outcomes under Theme 2: Supporting those struggling to pay their bills in order to ensure support for consumers in vulnerable situations is line with ability to pay rules. We also made some minor wording changes to bring greater clarity to the intent of the outcomes and definitions within the outcomes. Please see Appendix 2 of the Consumer Vulnerability Strategy for further detail.

7. Do you have any comments on our definitions of success or metrics to monitor progress and delivery of the outcomes?

There was broad agreement across respondents that success should be assessed through a combination of quantitative measures, reflecting both the immediate reduction of arrears and any longer-term improvements in affordability, wellbeing, and prevention of self-disconnection. Many stakeholders stressed that focusing solely on response time or complaint volumes would overlook whether interventions truly resolve underlying issues or reach those in the most vulnerable circumstances. There were also calls to ensure that metrics capture the experiences of different consumer groups, particularly those with lower incomes or who face challenges in navigating billing and payment options.

Consumer group & charity stakeholders made several suggestions on measuring the experiences of those struggling with bills. Some suggested they would like to see metrics and outcomes to ensure no unnecessary distress or harm comes to customers in arrears, such as whether interventions lift consumers out of fuel poverty. They would also like to consider the risk of self-disconnection, given the link between self-disconnection and debt.

The recommendations to use plain English on bills and to enhance affordability metrics came mostly from consumer groups and charities. They stressed that simpler language is vital to help these individuals fully grasp their payment options and available support. A few suppliers also echoed this point, noting that clearer bills can help those with limited financial literacy make more informed decisions about their energy usage and costs.

Suppliers broadly supported the introduction of clear, concrete indicators to track how well different strategies are serving consumers. Several respondents suggested that current approaches to measuring success lack sufficient detail, particularly around how to gauge the effectiveness of repayment plans, the extent to which consumers remain on those plans over time, and more granular reporting on outstanding debt levels.

A few suppliers also highlighted the need for specific metrics tailored to consumers in vulnerable situations, arguing that standard satisfaction surveys do not capture the nuances of their experiences. They pointed out that such surveys often overlook factors like communication barriers, affordability constraints, or the additional support some individuals may need. By proposing more finely tuned metrics, these suppliers believe it would be easier to identify gaps in service and provide targeted interventions that genuinely help those facing the greatest challenges. One of the suppliers welcomed further development of success scores or metrics, suggesting targets directly tied to the desired outcomes are needed. Some examples they gave included reducing arrears and self-disconnection.

Distribution Network Operators called for better alignment between the desired benefits in the outcomes and the measures proposed.

One Network Operator respondent advocated a standardised format for bills to promote consistency. Another highlighted the relationship between debt and mental wellbeing and said it should be factored into the success metrics.

Stakeholders in the 'other' group supported plain English on bills and the removal of non-bill-related information that can confuse consumers. In addition, stakeholders in this

group noted that energy efficiency measures and addressing long-term fuel poverty should also factor into how success is defined for example, signposting consumers in vulnerable situations to advice/support.

Stakeholders recommend monitoring reductions in energy debt as a clear measure of success, especially for those on low incomes. They suggested tracking average arrears before and after interventions, arguing that this would show whether policies or support schemes genuinely ease financial burdens. Proponents noted that focusing on debt reduction could help prevent self-disconnection and provide tangible proof that the sector is delivering meaningful relief to vulnerable households.

In general, stakeholders wanted clear, quantitative metrics tied to concrete consumer outcomes, especially around affordability, arrears management, and prevention of consumer harm. Many also stressed the importance of qualitative feedback for example, consumer experiences, mental wellbeing to capture the full impact of interventions.

Our response

We will continue to develop core work to deliver fuel poverty schemes on behalf of government, such as Warm Home Discount and Energy Company Obligation 4. However, we are of the position that as a matter for government, interventions to lift consumers out of fuel poverty should not be included as a measure of success under Theme 2: Supporting those struggling with bills, and instead is best addressed within the work programmes we have set out to deliver. Similarly, there are many factors that contribute to vulnerability and can increase the risk of detriment or harm to consumers being realised, such as health and mental health, poor literacy or numeracy skills, and digital or language exclusion. We set out our decision to retain the current broad definition of vulnerability to capture the dynamic and transient nature of vulnerability and are of the position that suppliers' obligations in ensuring no unnecessary harms or distress to consumers in vulnerable situations are clear.

We acknowledge stakeholder suggestions for measures to increase clarity and understanding of consumer bills, however, the strategy is intended to set high-level aims and outcomes to improve standards for consumers in vulnerable situations and how we, and industry, can work to achieve them. We are of the position that further specificity in how to achieve them is best positioned within the work programmes we have set out to deliver.

We outline within the Strategy our ongoing work to support the delivery of Theme 2: Supporting those struggling to pay their bills and consider this best placed to address

ongoing work to achieve outcomes to reduce energy debt. We published our Debt Strategy in December 2024 setting out four components of work to reduce debt and arrears in the domestic energy market. These are 1) resetting debt through a proposed Debt Relief Scheme 2) reforming how suppliers manage debt by increasing Debt Standards 3) helping to prevent debt from occurring by looking at billing and access to credit and 4) energy affordability support. We will need all four components to reduce debt and arrears, and it is likely they will involve short- and longer-term work.

Theme 3: Driving improvements in customer service

8. Do you agree with our proposed outcomes?

Many respondents expressed broad support for raising customer service standards, emphasising accessibility, inclusion, and the need to protect consumers in vulnerable circumstances. Several respondents from consumer advocacy organisations and charities felt that referrals to third-party advocacy could help resolve complaints more effectively, and there were suggestions for embedding safety as a core component, given that some households may require additional reassurance or special service requirements. Several respondents from consumer advocacy organisations and charities suggested embedding safety as a core component, given that some households may require additional reassurance or special service requirements.

A significant number of stakeholders agreed that improving customer service is essential. Some suggested focusing on inclusive communication channels and ensuring that guidance is clear and easy to follow, especially for consumers who might find it difficult to articulate their complaints.

A few respondents highlighted the concept of safety, noting that consumers in vulnerable situations can have extra concerns about visits to their home or the overall reliability of services. They believed such issues should be explicitly recognised in the proposed outcomes.

Many respondents mentioned that monitoring the volume of complaints alone may not be sufficient if it does not capture accessibility challenges for those who struggle to voice their concerns in the first place. Some referenced established standards, such as BS ISO 22458, as a means of structuring dialogue between suppliers and consumers.

Several suppliers asked for more detail on how "driving improvements in customer service" would be defined in practice. They felt there should be a clear method of

tracking both everyday operational changes and more innovative efforts that raise overall satisfaction levels.

Our response

We agree that third-party advocacies are very helpful in supporting customer complaint resolution and helping to understand areas where some households may require additional support. However, we consider this best placed to be considered within existing licence obligations, and too nuanced for the Strategy itself.

We also agree that improving customer service is essential and have outlined within the Strategy our aims and outcomes in achieving this, which are also set out in our Consumer Confidence package of work. Our work will in both these areas sets out our ambition to drive a culture change in customer service for both domestic and non-domestic consumers. We will work closely with government to look at various options to help deliver on this ambition.

We agree with stakeholders that safety is a key issue. However, we consider this is an area which should be brought out within the key work projects, and this level of granularity is not for the Strategy itself.

We acknowledge stakeholder points on complaints monitoring. In addition to this, we also capture qualitative and quantitative data through our regular consumer surveys such as Energy Satisfaction surveys, and our Consumer Impacts of Market Conditions survey in order to build greater understanding of consumer experiences within the energy market. Additionally, while we cannot obligate suppliers to adopt established standards such as BS ISO 22458, we do recognise the benefit for companies in looking to improve their services.

9. Do you have any comments on our definitions of success or metrics to monitor progress and delivery of the outcomes?

Most respondents supported the idea of measurable, outcomes-based indicators that go beyond simple response times. There were widespread calls for qualitative insights into how promptly and effectively issues are resolved, rather than just how quickly a customer receives an initial reply.

Many participants suggested collecting more detailed metrics that reflect the experiences of those who may be marginalised or have specific communication needs. Some examples included waiting times to speak to a supplier, the availability of interpreting

services, or standardised procedures for authorising third parties to act on a customer's behalf.

Consumer groups and charity stakeholders felt that rural areas and people with disabilities should be explicitly acknowledged, proposing additional measures or data collection to ensure these groups are not overlooked. Some called for a "consumer duty" to raise expectations regarding service quality and inclusivity.

Suppliers mostly supported a clear, outcomes-based approach, though a few stressed that quick response times should not be conflated with effective resolution. Differentiating the experiences of vulnerable and non-vulnerable consumers was regarded as vital to understanding the true impact of any improvement initiatives.

Network operators emphasised consistent engagement to track whether customers' needs are being met over time, particularly for those who may rely on alternative communication methods. Others underlined the importance of collecting data about customers who speak English as a second language, to ensure inclusivity is firmly embedded in service delivery.

Overall, there was consensus that a mix of quantitative and qualitative feedback is needed to capture the full spectrum of customer experiences. Many urged the sector to demonstrate clear progress by regularly publishing relevant metrics and results, rather than offering only high-level updates or one-off reviews.

Our response

We acknowledge stakeholder points on qualitative insights for further detail in resolving customer issues. We collect quantitative data through our regular consumer surveys, such as the Energy Consumer Satisfaction Survey and the Consumer Impacts of Market Conditions Survey, to track consumer experiences in the energy market. As well as this, Ofgem conducts bespoke qualitative research to provide a richer and more robust understanding of consumer experiences and outcomes. As part of our programme of work, we will consider other, more specific monitoring mechanisms to further build a better picture of consumer experiences, including those who are in vulnerable situations.We welcome DESNZ's review of Ofgem, and the opportunity it may give to ensure we have the right powers to protect consumers and drive-up standards, including for those in vulnerable situations. Once the review is finalised and government has determined Ofgem's future role, we will work through any implications for our Vulnerability Strategy including the themes and outcomes we have set.

We agree on the importance of consistent engagement to ensure consumer needs are being met, and the need for more granular data to build greater understanding of consumer experiences. We will explore this further as part of the Vulnerability Focus Sessions with suppliers; an adapted version of our proposals outlined in consultation. As part of the sessions, we will build upon the existing data collected from suppliers in relation to their social obligations (SOR), customer survey data, and RFIs, and gather some additional data to create an improved, comprehensive understanding of vulnerability in the energy sector. We welcome useful, additional data from alternative sources also.

Theme 4: Encouraging positive and inclusive innovation

10. Do you agree with our proposed outcomes?

Most respondents supported the idea of fostering innovation that propels the energy transition while also meeting the needs of customers who are at risk of exclusion. There were repeated calls for inclusion to be placed front and centre, with several participants emphasising that affordability and accessibility should not be treated as secondary considerations.

Many stakeholders, some from consumer advocacy bodies, said innovation programmes such as Retail Innovation and Future Price Protection can be particularly valuable for people in vulnerable circumstances. However, they cautioned that any gains must be shared equitably, rather than being driven by purely commercial factors.

Several contributors expressed concerns that those who could benefit the most may struggle to engage. Typical barriers included upfront costs, limited digital literacy, or having a residential status, for example renting, that restricts access to new tariffs or technologies. Some suppliers noted that these challenges can persist even when initiatives are explicitly designed to help households on low incomes.

One supplier cited a case study in which they offered cost reductions for future energy consumption and debt forgiveness, provided customers agreed to certain steps such as installing a smart meter. Despite apparent benefits, uptake remained low. Customers were either wary of smart meter installation or uncertain about how the scheme worked in practice. This was seen as a reminder that simply rolling out an offer does not guarantee engagement from those it intends to serve.

Several organisations, particularly consumer advocacy groups and community-based charities highlighted the importance of co-creating solutions with the very people most

at risk of missing out. They insisted that innovation should not be done to consumers in vulnerable situations, but done with them, ensuring that product design, communication strategies, and eligibility criteria genuinely reflect people's circumstances.

In addition, charities focusing on consumer rights underlined the need to retain strong protections, warning that while a light-touch regulatory environment can stimulate creativity, it must not come at the expense of safeguarding people who are already in precarious situations.

A mixture of stakeholders from charities and also the other category also urged robust consumer protections to be retained. They argued that while regulation should not stifle creativity, it must prevent scenarios where affordability barriers or hidden eligibility requirements exclude segments of the population from accessing the latest offerings.

Our response

We have made amendments to some wording included in theme 4: Encouraging positive and inclusive innovation, to provide greater clarity on the intention to ensure that customers in vulnerable situations who are unable/unwilling to adopt new technologies remain protected. However, we are of the position that the outcomes themselves should be broad ranging, and the amendments take into account the different aspects of the transition that customers can participate in and promote inclusion.

We are keen to ensure that our approach to regulation does not create barriers to innovation that delivers the benefits of it, such as lower bills, better service, and facilitation of the delivery of net zero at lowest cost. We strongly encourage companies to incorporate inclusive design at the earliest feasible stage to prevent exclusion or adverse outcomes for consumers in vulnerable situations, and utilise innovative solutions to better meet the specific, more complex needs of consumers in vulnerable situations. We set out further within the Strategy work programmes to further support the delivery of this theme, including how we will work with industry to better understand the barriers and how we may be able to unlock more innovation, including for consumers in vulnerable situations.

We recognise that there continues to be low levels of engagement in accessing innovative products and/or services, particularly for consumers in vulnerable situations. However, early results from consumer research indicate that more consumers are contacting their suppliers to ask about products and services they offer.

We agree with stakeholder calls for innovation to be inclusive and designed with customers in vulnerable situations as a focus. We strongly encourage energy companies

to incorporate inclusive design and consideration of lived experiences at the outset, and throughout, the decision-making process.

11. Do you have any comments on our definitions of success or metrics to monitor progress and delivery of the outcomes?

Most respondents favoured a comprehensive approach to measuring success, progress and delivery of outcomes. They wanted a mixing of both quantitative and qualitative indicators so that the real-world experiences of consumers in vulnerable situations are captured. Many recommended tracking not only how many people adopt new products but also the extent to which those innovations bring tangible benefits, financial or otherwise.

Stakeholders from various sectors suggested that standard adoption rates and complaint numbers alone are insufficient. They wanted more detailed data collection, such as whether individuals living in rural areas or with disabilities can readily participate, or if older or low-income households perceive the changes as accessible and trustworthy.

Some suppliers pointed out that innovation often takes time to gain momentum. They advised setting realistic expectations and avoiding overly prescriptive rules, advocating instead for high-level principles to allow new models to develop and scale. At the same time, they agreed that strong consumer protections should remain in place to ensure no one is left behind.

Several participants highlighted the value of impact assessments and distributional analysis, suggesting these should look at cost savings, consumer satisfaction, and the extent to which different groups feel included in the benefits. They believed data-sharing frameworks could help policymakers and industry partners pinpoint where additional support might be needed.

There were also calls for clearer alignment between any success measures and the overarching goal of reducing vulnerability. Some stakeholders remarked that only assessing how many people install a new device or sign up to a tariff may not reveal whether these changes alleviate hardship or improve longer-term wellbeing.

Stakeholders in the other category advocated closer collaboration among suppliers, network operators, consumer organisations, and government bodies to pool insights on what works. They noted that published metrics, user surveys, and pilot evaluations could all contribute to a richer understanding of how effectively innovation addresses real-life barriers.

Overall, there was agreement that measuring progress should go beyond raw uptake figures and look at whether innovations are genuinely inclusive, especially for those who might lack digital access, struggle with debt, or have language barriers. Many saw the combination of quantitative data and qualitative feedback as key to ensuring that the push for innovation delivers meaningful, lasting benefits.

Our response

We have made some amendments to how we will measure success of the outcomes within this theme, due to the challenging nature of measuring progress against an area which is intangible in its nature. We aim to improve the quality of data we use to monitor progress as the work of the Strategy progresses.

We acknowledge stakeholder calls for more detailed data collection. We welcome third-party data in this area and anticipate making necessary changes to current data collection methods.

As previously outlined, we are keen to ensure that our approach to regulation does not create barriers to innovation while still ensuring consumers are protected. We will continue working with industry to ensure we are striking the right balance between consumer protections and access to innovative products and services.

As we outline earlier in our response summary, ensuring that the market delivers positive and fair outcomes for consumers who are struggling to engage cuts across all of our functions. We continually measure and assess how changes to policies can affect consumers, including consumers in vulnerable situations using distributional analysis of consumer archetypes, helping us understand the different needs of different energy consumers. We encourage all energy companies to do the same.

While we acknowledge stakeholder views that the outlined measures of success do not provide an avenue for exploring how to reduce or improve hardship or wellbeing, we are of the position that the aim of this theme is to enabling participation in and ensure protection of consumers in vulnerable situations when engaging with innovative produce and services as the market evolves.

Increasing transparency and accountability

12. Do you agree with our proposals for annual supplier presentations to Ofgem on how they are delivering good outcomes for their consumers in vulnerable situations?

Stakeholders were split in their views on proposals for annual supplier presentations to Ofgem on how suppliers are delivering good outcomes for their consumers.

The majority of suppliers were welcoming of the aims of the annual supplier presentations in increasing transparency but were sceptical of the panels as the means to achieve transparency objectives. Most of the suppliers expressed concerns that annual panels would create additional regulatory burden and work. Suppliers were worried that these panels would cause duplication with existing Energy UK's Vulnerability Commitment panel hearings. Suppliers suggested that Ofgem find alternative mechanisms to achieve its objectives. Some suggested that Ofgem could instead work closer with Energy UK in their Vulnerability Commitment or utilising other routes and established processes such as existing account management calls.

Network operators were divided in their views on supplier presentations. Network operator stakeholders were supportive of the principle of the panels and the aims they sought to achieve, however some questioned whether this was the most optimal method to drive outcomes. Two stakeholders in this group noted that lessons from the Stakeholder Engagement and Consumer Vulnerability (SECV) approach should be considered. Two network operators noted that the panel assessment approach under SECV were not optimal for increasing collaboration and accurate reporting and have since moved away from it. Despite this, stakeholders were keen to see mechanisms which allow suppliers to showcase good outcomes. Some suggestions which stakeholders in this group made were creating clearly measurable mechanisms which drive and demonstrate good outcomes for consumers and suppliers producing annual reports on their services and outcomes which allow for more targeted discussions between Ofgem and the suppliers. Two network operators noted that if panels were to be implemented, it would be important the panels are represented with consumers in vulnerable situations and network operators to bring a wide range of perspectives.

In contrast, the majority of consumer groups and charities and stakeholders in the 'other' groups category were supportive of annual supplier presentations and believed it would be helpful in increasing transparency and accountability. Several stakeholders in the consumer groups and charities group also urged that the panel include consumers with lived experiences. Stakeholders from both groups posed questions on the practical running of these panels such as how information might be obtained, how this might align

with compliance procedures and suggestions of specific data that should be requested. Stakeholders from the 'other' groups also felt that more accountabilities could be built into how suppliers deliver on outcomes such as clear and measurable outcomes which suppliers report progress upon and attaching enforcement measures.

Our response

We understand the concerns raised by some stakeholders on potential duplication of existing Energy UK Vulnerability Commitments and our proposal to introduce annual supplier presentations, and concern raised by suppliers on potential additional regulatory burden. While we welcome and support Energy UK Vulnerability Commitments in developing principles to drive up standards for, and supporting consumers in vulnerable situations, the commitments are voluntary, with the main objective being to highlight supplier practices over and above existing licence requirements. This means that the Energy UK commitments hearings do not cover the vulnerability focused licence obligations we are aiming to assess nor the supplier actions that deliver consumer outcomes.

The sessions will focus on how suppliers are delivering regulatory obligations and ensure coordination of the different elements of our regulatory and outcomes based work We will work with Energy UK to harmonise the focus of each The sessions will focus on how suppliers are delivering regulatory obligations and ensure coordination of the different elements of our regulatory and outcomes-based work We will work with Energy UK to harmonise the focus of each

As such, we have decided to proceed with an adapted version of our proposal and will introduce supplier Vulnerability Focus Sessions, which we consider reduces the regulatory burden internally and externally, while achieving the same objective.

The composition of these Focus Sessions is outlined within the Strategy, and following publication of the Strategy, we will work with suppliers to finalise design of the sessions and provide guidance for suppliers to support evidence gathering. Findings from the sessions will be published within a Consumer Vulnerability Strategy: Progress report.

13.   **Do you agree with our proposals for reporting the findings from these presentations, and for the inclusion of the key SOR metrics and research to be included?**

The majority of stakeholders agreed with proposals for reporting findings and for the inclusion of key SOR metrics and research to be included.

Suppliers caveated that should presentations go ahead; it would be valuable to share information gathered in a positive way and highlight good practice where appropriate. Stakeholders in this group agreed that publishing findings could help foster openness and transparency. However, two suppliers posed questions on this approach. One raised that SOR data may not be the most appropriate data source to achieve Ofgem's objectives and were keen for additional information on which parts of SOR will be used. Another raised that suppliers vary in their approaches to support customers, and it may be difficult to set a clear, fair benchmark which applies to all suppliers.

Stakeholders in the consumer groups and charities group, network operators' group, and 'other' group agreed that it will support greater transparency and access to data. Some responses also suggested inclusion of other data alongside SOR metrics, such as number of consumers in vulnerable situations getting support through surveys, annual RFIs and lived experience data.

Our response

We will synthesise findings from the Vulnerability Focus sessions and publish good practice observed from suppliers. Existing vulnerability data, such as those captured in Social Obligations Reporting and any new data gathered will also be published to provide a comprehensive understanding of the vulnerability landscape. We are continuing discussions internally to determine the best way to realise comprehensive vulnerability data from suppliers as part of the Focus sessions.

To support greater transparency, improve accountability and for easier access to our vulnerability strategy and workplan progress, we will proceed with plans to publish updates to the Strategy on our website. We are also continuing to make improvements to our website as part of a wider transformation and improvement, and this will compliment current work to strengthen Ofgem's transparency and accountability in response to the Ofgem Review and wider Government reform agenda for regulators.

14. Do you agree with our proposals for a dedicated section on our website to inform updates for the live Strategy?

Stakeholders across the different groups agreed with proposals for a dedicated section on the Ofgem website for updates.

Some suppliers, consumer groups and charities and one network operator noted that the website needs to be accessible. Some suppliers noted that the live strategy should be

accessible to consumers and one network operator noted that the website should be accessible both in terms of how the information can be found and the way it is written.

A couple of consumer groups and charity stakeholders cautioned that the site needs to be regularly updated with the latest information/data, some suggested that they would like email updates when it is updated.

One supplier also noted that any changes which impact suppliers should be consulted on with suppliers.

Our response

We are committed to making our website accessible, in accordance with the Public Sector Bodies (website and Mobile Applications) (No.2) Accessibility Regulations 2018. The website is compliant with the [Web Content Accessibility Guidelines (WCAG) 2.1AA standard](#).

To ensure you are kept up to date of with publications, including any updates to the Strategy and workplans, we recommend subscribing to our news services, where you can set preferences on the types of information you wish to be informed of and when. [Subscribe to Ofgem news services](#).

We are required to consult where there is an explicit statutory requirement for us to do so, and we must exercise our statutory duties in line with our public law duty to act in a fair and reasonable way. We may also consult if a duty arises under the common law duty/public law principle of procedural fairness. Although there is no general common law duty to consult people who may be affected by a decision, a duty to consult arises if there is a legitimate expectation that we will do so.