



DIGITALPOWER UK LTD

Managing Vulnerability Policy

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Managing Vulnerability Policy

1. Purpose

The Managing vulnerability Policy provides information about the commitments and conditions of Digital Power UK LTD domestic customers in accordance with the license conditions 'Electricity act 1989 Standard conditions of electricity supply license'¹(consolidated to 17 May 2023) and 'Gas act 1986 Standard conditions of Gas supply license'²(consolidated to 17 May 2023).

2. Scope

This document is limited to those aspects that are relevant to residential domestic customers only and defines the key activities within DIGITAL POWER LTD, their function and how each function shall meet the specific license conditions with regards to vulnerability as well as doing the right thing.

This document will identify rules for validation of data, workflows, activities, and identify where templates are required (for letters or emails) and where further requirements/specifications are needed.

3. Managing Vulnerability

DIGITAL POWER LTD is required to ensure that they, in relation to a customer in a vulnerable situation.

"Vulnerable Situation, means the personal circumstances and characteristics of a customer create a situation where he or she is: (a) significantly less able than a typical customer to protect or represent his or her interests; and/or (b) significantly more likely than a typical customer to suffer detriment or that detriment is likely to be more substantial." (Section SLC 0.9)

- Seek to identify each customer in a vulnerable situation, in a manner that is effective and appropriate to the definition above.
- And when applying the criteria listed above in all sections do so in a manner that considers any vulnerable situation of each customer.

By ensuring that employees, system and processes prioritise customer service and ensure that their customers have access to support and assistance when needed. This can be achieved by providing multiple channels of communication, responding promptly to customer inquiries and complaints, and offering training and education to help customers make informed decisions about their energy use.

¹ Electricity Act - <https://www.ofgem.gov.uk/sites/default/files/2023-03/Electricity%20Supply%20Standard%20Consolidated%20Licence%20Conditions%20-%20Current.pdf>

² Gas Act - <https://www.ofgem.gov.uk/sites/default/files/2023-03/Gas%20Supply%20Standard%20Consolidated%20Licence%20Conditions%20-%20Current.pdf>

Customer Service is assessed and supported by situation as per **Customer Service Policy**.

and review and prioritise the situation but consider the other factors that include;

- **Affordability:** by ensuring that the services are affordable and accessible to all customers, regardless of their income level. This may involve offering payment plans, subsidies, or other forms of financial assistance to those who are struggling to pay their bills.
- **Reliability:** maintain a reliable and consistent supply of energy to their customers. This means investing in infrastructure, upgrading equipment, and implementing effective maintenance and repair procedures to minimize downtime and disruptions.
- **Data privacy and security:** protect customers' data and ensure it is not used or shared without their consent. This can be achieved by implementing robust data protection policies and procedures, investing in secure IT infrastructure, and training employees on data privacy and security best practices.

In relation to the direct customer

- **Health and Safety:** may involve providing extra support during extreme weather events or other emergencies, such as power outages, to ensure that vulnerable customers have access to electricity for medical equipment or heating and cooling.
- **Financial vulnerability:** mindful of customers who are struggling to pay their bills and may be at risk of disconnection. This may involve offering flexible payment options, assistance programs, or energy efficiency advice to help reduce cost
- **Accessibility:** must ensure that their services are accessible to all customers, regardless of their physical or cognitive abilities. This may involve providing special equipment or devices, such as hearing aids or Braille bills, or making accommodations for customers with mobility or visual impairments.
- **Language and cultural barriers:** must ensure that their services are accessible to customers who may not speak the local language or who come from different cultural backgrounds. This may involve providing translation services or offering educational materials in multiple languages.
- **Customer Support:** must provide accessible and responsive customer support to vulnerable customers. This may involve offering specialized training to customer service representatives to help them identify and assist customers who may be experiencing vulnerabilities.

In accordance with the license condition (SLC0) "Standard of Conduct." DIGITAL POWER LTD will consider the following conditions for any actions that directly or indirectly affect the customer.

3.1 Priority Service Register Information (SLC26):

Priority Services Register (PSR) is a service DIGITAL POWER LTD offers to vulnerable customers who may need additional support during power outages or other emergencies.

Once a customer is registered on the PSR, DIGITAL POWER LTD will keep their details on a database to identify and support customers who are vulnerable or at risk during power outages or other emergencies.

Some of the additional support that may be offered to PSR customers include:

- Priority assistance during power cuts: PSR customers will be given priority assistance during power cuts. This may involve providing a generator or other equipment to help keep essential medical equipment running.
- Advance notice of planned power cuts: PSR customers will be given advance notice of planned power cuts in their area, so they can make arrangements to prepare.
- Meter readings: DIGITAL POWER LTD will arrange to read the meters of PSR customers, so they do not need to read them themselves.
- Additional support during emergencies: PSR customers may be offered additional support during emergencies, such as help getting to a rest centre, or assistance with temporary accommodation.

The PSR is available to vulnerable customers who may need extra support and Rebel has defined the PSR eligibility.

- Elderly customers: Customers who are over a certain age, typically 60 or 65.
- Disabled customers: Customers who have a disability or mobility issue that makes it difficult for them to cope without power.
- Customers with a chronic illness: Customers with a chronic illness or medical condition that requires electrical equipment, such as an oxygen concentrator.
- Customers with a serious or long-term illness: Customers who have a serious or long-term illness that affects their ability to live independently or cope without power.
- Customers with young children: Customers who have young children, particularly those under the age of five.
- Customers with communication difficulties: Customers who have communication difficulties, such as those who are deaf or hard of hearing.

It's important to note that these eligibility criteria are not exhaustive, and DIGITAL POWER LTD may also consider other factors when determining whether a customer is eligible for the PSR.

As detailed in the **Customer Service Policy**

- DIGITAL POWER LTD shall ensure that as part of its ethos to ensure that all customers know they can discuss Priority Services requirements and needs.
- Where necessary DIGITAL POWER LTD shall share specific information with third parties contracted to DIGITAL POWER LTD (Meter operators, Ofgem, Data Retrievers for example) where consent has been given by the customer.

3.2 Debt and Early Engagement (SLC14).

Ways that DIGITAL POWER LTD will monitor and support customers for vulnerability will be through practical ways to ensure that vulnerability is captured at the earliest opportunity;

Tracking payment trends: DIGITAL POWER LTD shall ensure that they will look at specific trends associated to customer activities that may suggest that they will have problems paying; these include cancellation of direct debits, late payments of bills, high energy consumption or but not limited to the continual access to emergency credit on a prepayment meter.

DIGITAL POWER LTD has identified alerts that would trigger to ensure that the Customer is highlighted as **Financially Vulnerable** and would be moved over to a specialised Customer Service team in line

with the **Customer Services Vulnerability Work Instruction**

Automated alerts: Implementing an automated system that generates alerts when certain payment-related patterns or trends are detected. These alerts can notify customer service representatives or relevant teams to take necessary actions.

DIGITAL POWER LTD has identified alerts that would trigger to ensure that the Customer is highlighted and a specialised Customer Service team, will follow up to ensure that the vulnerability is captured and supported inline with the **Customer Services Vulnerability Work Instruction**

3.3 Proactive Communication (SLC27).

DIGITAL POWER LTD will work to raise awareness across all of its platforms to ensure that customers know and are enabled to contact Rebel Eergy and get the support they need should they believe or think that they will be in difficulty.

Channels that can be utilised can be;

Personalised messaging: Send targeted messages to customers highlighting the importance of energy access and support. Tailor the communication based on customers' specific vulnerabilities, such as elderly or disabled individuals, families with young children, or those facing financial hardships.

Regular newsletters or email campaigns: Distribute regular newsletters or email updates to customers, emphasizing the company's commitment to ensuring energy access and support for all. Include information about available assistance programs, energy-saving tips, and contact details for further assistance.

Dedicated customer support channels: Establish dedicated customer support channels, such as a helpline or online chat, specifically focused on addressing vulnerabilities and providing support. Ensure that these channels are easily accessible and prominently advertised to customers.

Collaboration with advocacy groups: Partner with advocacy groups, such as charities or organisations focused on supporting vulnerable populations, to jointly raise awareness about energy access and support. Share resources, collaborate on outreach campaigns, and participate in community events to reach a broader audience.

Social media campaigns: Utilise social media platforms to spread awareness about energy access and support initiatives. Share success stories, energy efficiency tips, and assistance program information. Encourage customers to share their experiences and engage in conversations around energy access.

Community outreach programs: Organise or participate in community events, workshops, or information sessions to educate customers about their rights to energy and available support. Collaborate with local authorities, community centers, and organisations to reach diverse customers.

Collaborative partnerships: Forge partnerships with local charities, housing associations, and social service organisations to identify customers in need and facilitate the provision of support services. Establish referral systems to ensure a coordinated approach in assisting vulnerable customers.

Transparent billing and communication: Ensure that billing statements are clear and easy to understand, providing customers with detailed information about charges, available payment

options, and support programs and include messages of empathy and encouragement to seek assistance if needed.

By implementing these proactive communication strategies, DIGITAL POWER LTD can emphasise its commitment to supporting all customers, raising awareness about available assistance, and foster a culture of inclusivity and understanding.

3.4 Engage with Citizens Advice and other third parties (SLC31G).

DIGITAL POWER LTD shall ensure that at the earliest opportunity engage with and build a collaborative working relationship with other parties to support the customer needs and allowing the customer to seek additional advice outside of the organisation.

These will include Citizens Advice, Debt Charities, Age and Disability related charities, Grant and incentive organisations, and supported inline with the **Customer Services Vulnerability Work Instruction**.

Once identified, DIGITAL POWER LTD shall proactively discuss the situation with the customer and identify what can be agreed to assist them.

4. Policy Change Control

This Policy document will be formally controlled and used to monitor and measure compliance of Managing Vulnerability processes and procedures.

Any changes to this Work Instruction shall only occur after completing a risk assessment against the changes for DIGITAL POWER LTD, and its effected customers, to ensure DIGITAL POWER LTD continue to meet their SEC obligations.

Consequences

Non-compliance with this Work Instruction could have a significant effect on the efficient operation of the organisation and may result in financial loss and an inability to provide necessary services to our customers. Any employee found to have breached this work instruction may be subject to disciplinary procedure.

If a criminal offence is considered to have been committed, further action may be taken to assist in the prosecution of the offender(s).