

VULNERABILITY COMMITMENT

VISION

The Vulnerability Commitment is a voluntary agreement that Isle of Man Energy is committed to, to improve the support provided to vulnerable households. Isle of Man Energy is resolved to adopt a collaborative, proactive and transparent approach that will improve both the quality of support provided and customer awareness that this support exists. In an economic climate where household incomes are under enormous pressure, Isle of Man Energy are determined to lead the sector by demonstrating the role that energy companies can play. It is encouraged that all energy companies, including oil and electricity, also sign up to this commitment.

CONTEXT

Gas is a regulated sector in the Isle of Man with a wide-ranging set of requirements for the protection of domestic customers. It is right that core customer protections apply to all energy suppliers, not just some. The role of the Vulnerability Commitment is to establish a new approach to complement the regulation framework and current legislation.

Isle of Man Energy will not knowingly disconnect the supply to a premises of a customer identified as vulnerable during the Winter Moratorium between the months of October to March. A vulnerable customer is considered as per the below, but is not limited to those who:

- Are of pensionable age with no support in their home, or,
- Are entitled to a disability living allowance or a war disablement pension, or,
- Share a household with a child under six years of age (this also applies during the Winter Moratorium in a home with a child sixteen or under), or,
- Need a continuous energy supply for health reasons including those living at home with life limiting medical conditions, or,
- Have engaged with Isle of Man Energy and registered themselves as a Priority Customer

PRINCIPLES AND COMMITMENTS

Accessibility (communications)

Isle of Man Energy will make it as easy as possible for customers in vulnerable circumstances to disclose relevant information, and to access the most suitable additional support, by:

- Equipping front line staff and all those in relevant roles with effective training - whether internally or externally delivered - in identifying and supporting customers who might be in vulnerable circumstances.
- Ensuring that an understanding of customer vulnerability is embedded throughout all relevant levels of the company and ensure any external agencies operating on the company's behalf have robust vulnerability policies.
- Gathering feedback from frontline staff through various channels to highlight suggestions or issues that could help the company to improve support for customers in vulnerable circumstances.
- Taking all reasonable steps to design relevant customer communications and processes in a manner that supports customers to feel comfortable in disclosing vulnerabilities.
- Providing a range of channels of communication that are appropriate and suitable for customers' needs. Abiding by these accessibility principles includes specific commitments to:
 - Provide a customer service phonenumber that all customers can call without incurring a premium rate charge and ensure a freephone number can be given to customers in financial hardship where appropriate.
 - Provide at least one alternative form of communication in addition to phone contact.
 - Review the accessibility of digital platforms for vulnerable customers and implement improvement measures based on these findings, as necessary.
 - Ensure that customers have paper versions of all billing communications made available where this is appropriate for their needs.
 - Gather feedback from customers on the ease of understanding of billing communication and implement improvement measures based on these findings, as necessary.

Accessibility (of supply)

Isle of Man Energy will work to ensure that customers identified as vulnerable remain on supply, ensuring this by (in addition to that previously mentioned):

- Ensuring that an understanding of customer vulnerability is embedded throughout all relevant levels of the business and ensure any external agencies operating on the company's behalf have robust vulnerability policies.
- Having robust processes in place to ensure that customers who are identified as vulnerable may not be escalated through the dunning cycle in similar ways.
- Ensuring that when a vulnerable customer contacts Isle of Man Energy, front line staff are trained and equipped to provide the customer with all additional support that is available.

Abiding by these accessibility principles includes specific commitments to:

1. Only use the Courts to recover debts where appropriate for a vulnerable customer, taking into consideration any wider vulnerabilities that may be exacerbated by Court enforcement action.
2. Support vulnerable customers throughout year to avoid disconnection, where the household has children under the age of 6 (or under the age of 16 during the Winter Moratorium) or where for reasons of age, health, disability, or severe financial insecurity, that customer is unable to safeguard their personal welfare or the personal welfare of other members of the household.

Collaboration

Isle of Man Energy will work in partnership with the OFT, their own customers, other energy suppliers and experts in order to improve outcomes for all customers in vulnerable circumstances by:

- Having a strategy and effective arrangements in place for signposting and referring customers to relevant third-party support, including debt advice agencies.
- Having processes in place to signpost or assist customers to maximise their income, for example through partnerships with third parties to deliver benefit checks where appropriate.
- Contributing to increasing customer awareness of the support that energy suppliers can provide to vulnerable households, including raising awareness of the Vulnerability Commitment. Abiding by these principles of collaboration includes specific commitments to:
 - Contribute to the funding of some of the charities and third parties that provide support to energy customers.

Innovation

Isle of Man Energy will demonstrate their commitment to innovation and continuous improvement in the support of customers in vulnerable circumstances by:

- Striving to not only meet the minimum requirements set out in within this framework but also to demonstrate continuous improvement in the provision of support to vulnerable households.
- Investing as appropriate in features and tools that improve the support available for customers in vulnerable circumstances.
- Demonstrating how relevant innovations and services are informed by an effective understanding of the characteristics of their vulnerable customer base. Abiding by these principles of innovation includes specific commitments to:
 - Assign a dedicated vulnerability champion, at the leadership level, who will be responsible for overseeing the delivery of commitments to improve service to vulnerable households.
 - Commit to supporting or undertaking regular customer research (either individually, in partnership with third sector organisations, or collectively through the auspices of the Commitment) to ensure the approach to supporting vulnerable households is based on an informed and up-to-date understanding.