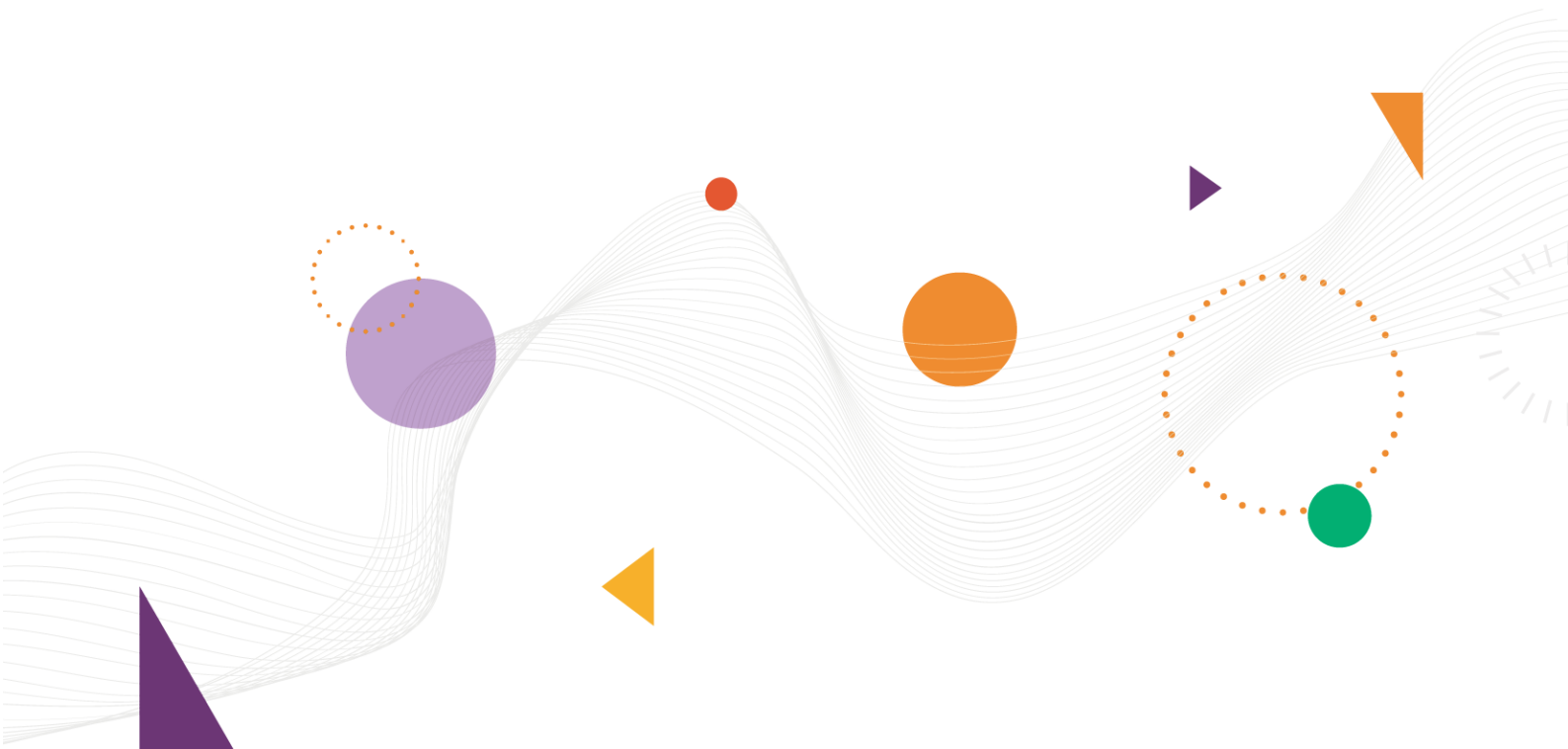


StepChange response to Ofgem Consultation: Refreshing our Consumer Vulnerability Strategy

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Summary

StepChange Debt Charity is a specialist not-for-profit provider of debt advice and debt solutions supporting people across the UK. In 2023, 620,069 people contacted StepChange seeking debt advice or guidance with their problem debt and over 180,000 people completed full debt advice through our online and telephone service.

We warmly welcome Ofgem's consultation on refreshing its Consumer Vulnerability Strategy. From the Covid pandemic to the energy crisis to ongoing cost of living challenges, the years since the strategy was last updated in 2019 have been extremely tumultuous for households' finances and overall wellbeing. More and more people have struggled to make ends meet and found themselves in vulnerable circumstances, including many StepChange debt advice clients.

These challenges are certainly not temporary, so we are pleased to see Ofgem recognise the enduring, significant nature of the affordability and debt problems consumers are facing – and the disproportionate impact faced by vulnerable individuals and households in this context. To put this into perspective, in the first half of 2024, 41% of StepChange debt advice clients responsible for paying energy bills had energy arrears and three quarters (74%) of this group had an additional vulnerability beyond their financial situation, compared to half (51%) of clients overall.

What's more, approaching half (47%) of clients with energy arrears in the first half of 2024 had a negative budget, meaning after going through a full debt advice and budgeting session, their monthly income is not enough to cover their basic monthly costs. Feedback from our debt advisers highlights some of the worrying consequences this financial difficulty can have on our clients, from causing or exacerbating mental health problems through to detrimental physical health impacts due to self-rationing energy consumption.

There is a pressing need to increase protections for, and improve the experiences of, customers struggling to keep up with energy bills and consequently interacting with the energy debt pathway – and there should be a strong focus on vulnerability in these efforts. While there is evidence of some good practice by energy suppliers, key problems we continue to see at StepChange include energy suppliers failing to identify and take account of consumer vulnerability, suppliers making unaffordable demands for repayment from financially vulnerable households, and the use of aggressive or inappropriate debt recovery methods.

We are pleased therefore that Ofgem has signalled a strong focus in this consultation on consumers in vulnerable situations having their needs identified, as well as receiving consistent and compassionate support. Consistency is crucial and this next strategic phase must focus on ensuring reliability of service and support for customers across all energy suppliers, so as to prevent consumers from facing an 'outcomes lottery' face depending on the supplier they are with.

We would also like to see Ofgem go further in its ambition. Ofgem states in its 2024 Consumer Confidence publication that its “goal is that all customers receive not just a good service but one that sets the highest standard for all service sectors”. It also specifically sets itself and the sector the challenge of matching the banking sector. In that context, the proposed vulnerability strategy looks too close to its predecessor, albeit with new commitments to monitor outcomes and a more focused delivery approach.

We have suggested in our response how Ofgem could look more closely at its vulnerability definition to better embed considerations of consumer vulnerability in supplier culture and practice. We also note that Ofgem states that it is “keen to work with Government to strengthen our powers and ensure they are sufficient to allow us to act to deliver the outcomes we want to see, particularly when things have gone wrong”. We would like to see Ofgem consider whether its consumer protection remit and powers are sufficient to achieve the objective set out in Consumer Confidence publication.

Ofgem’s remit differs from that of the Financial Conduct Authority (FCA) in some respects that may be affecting its ability to deliver good outcomes for energy customers. At a high level, Ofgem’s consumer protection responsibilities and powers appear framed foremost in regard to market and supply regulation, rather than products, services and consumer vulnerability. Ofgem does not, for example, appear to have a similar responsibility to the FCA in the latter’s consumer objective to have regard to the principle that firms “should be expected to provide consumers with a level of care that is appropriate” [taking into account relevant factors].¹ The FCA has relied to some degree on this language in its regulatory programme on consumer vulnerability, which begs the question as to whether Ofgem has the responsibilities and powers it needs to adopt a similar approach and deliver its stated objective of the highest standard of service to all consumers.

Statutory powers raise nuanced and complex questions. Given that Ofgem has committed to work with Government to consider the powers it needs to meet wider consumer objectives (such as its investigatory powers and powers to protect the interests of consumers when suppliers fail), we would like to see it consider as part of this conversation whether its consumer protections objective can be better aligned with widely shared aspirations to improve outcomes for energy customers in vulnerable situations.

¹ Financial Services and Markets Act 2000, part 1c, [The consumer protection objective](#)

Responses to questions

Consumer Vulnerability

Q1: Do you agree that we should not prioritise updating the vulnerability definition?

While we broadly welcome Ofgem’s framing of vulnerability throughout this consultation – and agree that pursuing a definition which avoids overbearing prescription to allow for flexibility is important – we would offer some challenges around the current wording. In particular, we have reservations around the use of the word “significantly” in the existing definition (i.e., “significantly less able” / “significantly more likely”).

We would argue that this sets too high a bar to account for the wide breadth of vulnerabilities people can and do experience, and is more limiting than the equivalent definition used by the FCA – that a vulnerable customer is someone who, due to their personal circumstances, is especially susceptible to harm, particularly when a firm is not acting with appropriate levels of care.

Ofgem states that it wants energy suppliers to “put in effort to identify and support customers in vulnerable circumstances, even if that is challenging.” Compared to the FCA’s definition, there is a risk that Ofgem’s current positioning could make it easier for suppliers to think of identification and support as an add-on, rather than a potential implication and imperative consideration in all customer journeys. Ensuring that the vulnerability definition does not set too high a bar is important to ensure that all suppliers embed the understanding that every customer is potentially vulnerable in their processes, communications and interactions.

It is worth highlighting that the poor outcomes for prepayment meter customers which garnered significant public attention and regulatory intervention in 2023 came about in part because energy suppliers failed to see the vulnerability of their customers as something that required additional care; leaving the definition as it is could risk perpetuating that culture.

The consultation rightly notes the importance of retaining a nuanced perspective of vulnerability, which recognises its transient nature. It is important that any definition allows space to reflect that people can – and often do – have multiple vulnerabilities at one time, and that some are temporary while others are constant.

It is worth noting that, in the first half of 2024, three quarters of new StepChange clients in energy arrears presented with a form of vulnerability. Over half (56%) had a mental health vulnerability, while a quarter (25%) had experienced an emergency issue – which can include includes experiences of domestic violence, a recent bereavement, redundancy or dismissal from work, suicidal tendencies and having been a victim of crime. Neurological, physical or other health issues were also present among a minority of clients.

Figure 1: Prevalence of vulnerabilities among StepChange clients in the first half of 2024

	All clients	Clients in energy arrears
Proportion of clients with any vulnerability	51%	74%
Mental health	36%	56%
Emergency issue	15%	25%
Family issues	11%	19%
Neurological or physical	10%	18%
Health	10%	18%
Addiction	4%	5%
Development or learning difficulty	1%	2%
Hearing or vision impairment	0.4%	1%
Communication	0.1%	0.4%
Housing	0.1%	0.2%
Other	11%	17%

We are pleased to see Ofgem acknowledge how the cost of living crisis, including steep energy prices, has in turn created and exacerbated vulnerabilities, including health problems – which continues to be the case. This context must be firmly embedded in considerations that Ofgem makes as it reflects on and reassesses its approach to vulnerability, and the regulator should take a flexible approach over the life cycle of the strategy, to account for emerging trends, issues and vulnerabilities.

Themes, outcomes and immediate priorities

Q2: Do you agree with our proposals to retain the five themes?

Q4: Do you agree with our proposed outcomes?

Q5: Do you have any comments on our definitions of success or metrics to monitor progress and delivery of the outcomes?

StepChange is broadly supportive of Ofgem retaining the previous five themes while moving forwards with a narrower strategy focused on a smaller set of outcomes, though we believe Ofgem could go further in places and be more ambitious in its expectations of firms.

We have combined our response to the above questions and broadly laid out our thoughts below.

Theme 1: Improving identification and smarter use of data

We warmly welcome a renewed focus on improving identification of vulnerability and smarter use of data, which can be a really powerful tool in recognising and understanding consumers' needs if used well. We are pleased to see the outcome summary focus on the need to let customers *easily* notify their supplier about their circumstances and for them to have a better understanding of the kind of support they can access.

We would however note that this theme needs to be considered in tandem with the separate themes, including supporting those struggling with bills and driving significant improvements in customer service. StepChange insights reveal worrying instances where our clients have made their experiences of vulnerability explicitly clear to energy suppliers, to have this experience disregarded. This includes experiences where vulnerable customers have made requests around accessibility, such as requiring payment cards or home visits to take meter readings, but had these requests neglected. This has exacerbated people's levels of debt in some cases.

Worryingly, there are instances where it appears emergency credit has not been applied, or people describe being on meter types which are inappropriate for their circumstances and go against existing rules. The below case studies exemplify these issues:

- *The client, who has a disability which means she cannot perform meter readings, requested that her energy supplier send an operative to her home to take these as she is unable to do so. So far the supplier has failed to do so, meaning the client is only getting estimated bills instead of accurate bills.*
- *The client is on a prepayment meter despite their daughter using a feeding tube which requires constant electricity supply. Their energy supplier would not provide emergency credit or assist in any way when supply was running low, despite the vulnerabilities present in the household.*

- *The client keeps getting disconnected, despite being registered as vulnerable with his energy supplier and requiring a constant electricity supply due to refrigerated medication. As he keeps being disconnected, he is not able to guarantee that he can keep the medication at the temperature it needs to be, so the client is not taking the medication.*

We would therefore encourage Ofgem to ensure that the drive to improve identification is consistently accompanied by tangible steps to act on and accommodate support relevant support needs. Ofgem notes that, where consumers' vulnerabilities have been identified or disclosed, "it is imperative they are offered adequate support"; we would strengthen this expectation so that it goes beyond a focus on "adequate" support, to a framing centred on compassion and consistent, positive outcomes.

We also warmly welcome the intended sub-outcome that vulnerable customers should have sufficient understanding of and easy access to the support and services available to them, including via the Priority Services Register (PSR) – and that Ofgem intends to scope discovery work on whether it should review the PSR. We believe that it is sensible to review whether the PSR is still fit for purpose in its current form, and consider what can be done to strengthen the perceived and actual value of being on this register.

While the proposed definitions of success and metrics to monitor progress and delivery of the identification theme workstream are welcome, we would also encourage Ofgem to include metrics which incorporate work beyond the PSR. This should include expectations around suppliers' systems and processes being designed in a way which enables vulnerable consumers to disclose their needs (and record those needs), and ensuring frontline staff have the ability to identify potential signs of vulnerability and explore these with customers.

Theme 2: Supporting those struggling with bills

We are supportive of this theme being retained, and welcome the accompanying outcomes. It is imperative that customers struggling to pay receive accurate bills that are easy to understand, compassionate and consistent support around affordability and debt, and flexibility in payment methods and frequencies.

At StepChange, we all too often see the negative consequences if these measures are not in place. For example, StepChange advisers continue to report harmful billing practices, including suppliers putting undue pressure on customers to accept unsustainable repayment rates, providing inadequate warning of bill changes or damaging billing errors. In certain cases, this has caused or exacerbated negative budgets or concerning mental health outcomes for clients:

- *The client had spoken to her energy supplier and mutually agreed that payment of £131 monthly would cover her usage, plus they would accept £12 weekly to the arrears. The supplier then increased the money taken towards her arrears and told her that her usage is £437.07 monthly. She has sent proof of faulty sockets and has been frightened to stay at the house due to the increasing arrears and costs. The client suffers with anxiety, and this is making it worse.*

- *The client, who has a negative budget, offered a token amount of £1 to her energy supplier and included her budget to evidence her financial situation. Despite seeing her budget is over £1,000 in deficit, the supplier is insisting on changing her direct debit to double the amount she is currently paying in order to recover her arrears; a change from £286 to £572. This is unaffordable to her, and she has been borrowing money from friends to pay. The situation has caused her to feel stressed and very upset.*
- *The client built up a small amount of arrears with her previous supplier, which was then taken over. When the account was acquired, the new supplier agreed for the client to pay £148 per month to cover her usage and her arrears. Now the supplier has reneged on the agreement and want the client to pay £324, which she is unable to do. This has made her feel suicidal and her family are watching her constantly as a result. Her family, who live with her, are feeling trapped as they are all frightened to even put on a light. The client's daughter showers at her local gym as she does not feel comfortable doing this at home.*
- *The client says that her energy supplier keeps cancelling her direct debits, messing around with her billing cycles which has now left her in debt with them. She has asked for callbacks from managers at the company but receives no calls. Other supplier representatives have admitted that there have been mistakes on the client's account but have yet to resolve the issues.*

We note that Ofgem has signalled that “improvements in the number of customers on repayment plans vs in arrears” could be a way to measure success in this area. While this is important, we would urge the regulator to expand this measure of success to focus on the *sustainability* of repayment plans agreed, to ensure arrangements fairly take into account customers’ often challenging and fluctuating circumstances.

We would argue that Ofgem’s current license conditions on repayment proposals are poorly framed and leave too much latitude for suppliers to put pressure on customers (whether deliberately or inadvertently), contributing to the common experiences we see among clients of unrealistic repayment demands that ultimately make their situation worse. Comparatively, the FCA requirements on banks/credit firms to identify and support borrowers in difficulty require firms to:

- proactively identify and engage with customers in difficulty (rather than relying on customers themselves to seek help);
- provide prompt, tailored support including referrals to free debt advice and setting out appropriate forbearance options; and
- ensure that repayment proposals are affordable and sustainable; and
- review repayment agreements at appropriate intervals to ensure they remain suitable.²

While there will be variability in conduct among financial services firms, we would expect the strong emphasis in the FCA’s rules on the importance of sustainable of repayment agreements to lead to better outcomes.

² Financial Conduct Authority (2024), [PS24/2: Strengthening protections for borrowers in financial difficulty: Consumer credit and mortgages](#)

We warmly welcome the fact that Ofgem intends to review its rules on the energy debt pathway as part of its Consumer Confidence package, to determine if any changes could help consumers that are struggling to pay or already behind on their bills. Ofgem should consider how it could use learnings from the FCA to take concrete action which leads to an increase in the prevalence of truly sustainable repayment arrangements.

It is also encouraging to see that Ofgem wants suppliers to proactively look out for customers that could be struggling by analysing the data available to them, including consumption. We believe that energy suppliers could be doing more to access the data available to them and utilise it in a way that supports customers in vulnerable situations.

Here, Ofgem could learn further from developments in the financial services sector, including the FCA's requirements for banks to operate data driven early intervention strategies related to repeat overdraft use, as well as its requirements on firms to identify and support borrowers in difficulty with credit products beyond overdrafts.³ We note the emphasis in these rules on a proactive rather than reactive approach, and more prescription around core expectations of firms while maintaining flexibility for firms to develop tailored approaches and good practice. There are also relevant takeaways where banks have been looking at transaction data to identify and understand if a customer's gambling is likely to be harmful in the context of their financial circumstances, in the form of financial vulnerability checks and financial risk assessments.⁴

In the context of Ofgem's work to improve outcomes for customers with energy debt, we would also highlight the importance of a clear, attractive offer of help to engage struggling customers. Supplier information for customers struggling often does not appear particularly visible and sends mixed messages, highlighting negative consequences of missing bill payments (like negative credit reporting) without necessarily offering the same clarity about the good outcome that should follow from engaging with a supplier like an affordable repayment plan. Unsurprisingly, struggling customers are often hesitant or reluctant to contact suppliers.

Ofgem can ensure suppliers act in a way that encourages engagement by highlighting the importance of a prominent support offer across all channels used by the supplier with well-designed explanations of the support available. This information should be tested to identify what works in engaging customers and iterated to maximise prevention of energy arrears and early engagement of those who fall behind.

Theme 3: Driving significant improvements in customer service

We warmly welcome the retention of this theme, and the intended outcome that vulnerable customers should be provided with tailored communications that are easy to understand, able to engage with their energy supplier with ease and do not face exclusion based on their circumstances.

³ Financial Conduct Authority (2023), [Evaluation Paper 23/1: An evaluation of our 2019 overdrafts intervention](#) and Financial Conduct Authority (2024), [PS24/2: Strengthening protections for borrowers in financial difficulty: Consumer credit and mortgages](#)

⁴ Gambling Commission (2024), [Open banking data modelling of gambling spend thresholds](#)

Our evidence suggests there is considerable progress to be made in this area. StepChange debt advisers continue to pick up on cases where a person or household in vulnerable circumstances, including those with long-term health conditions, have been treated poorly by their suppliers with minimal consideration given to their personal circumstances. The below examples exemplify these concerns:

- *The client, who is paralysed from the waist down, recently had multiple upsetting encounters with representatives from his energy supplier. When on a call about meter readings, one representative – who he had told about his health condition – repeatedly told him to get up and take photographs of the meters, even as he reiterated that he wasn't physically able to do so. When he told the representative she was upsetting him, he said her reply was that he needed to toughen up and all she wanted was a meter reading. The client also told StepChange how on a previous call with his supplier, another representative was rude to him and threatened bailiffs if he didn't pay. The client, who suffers from PTSD and has had suicidal thoughts in the past, indicated that these incidents have had a significantly distressing impact on his mental health.*
- *The client, who is in his 80s and hard of hearing, has been struggling with language barriers in conversations with his energy supplier from an outsourced call centre. He has asked for a contact number where he can speak with someone in the UK, but this has not been provided. He has also asked for someone to take a meter reading, and this hasn't happened. The supplier is not helping at all on calls, and just saying that he must pay. Due to the delays resulting from communication barriers, his supplier is now threatening further action.*
- *The client, who has mental health problems, is getting constant calls from his energy supplier demanding money that he can't afford as he is on benefits. The supplier has also threatened to break down his door to put a prepayment meter in. The client was on call with the supplier for over an hour going round in circles as he cannot afford what the supplier is asking. He told them about his mental health problems, and he felt they didn't listen.*

We also believe the content of this theme and its associated outcomes could be expanded to consider how the frequency of contact from energy suppliers impacts vulnerable customers, and the importance of tailoring this contact to suit differing needs. Research from the Money and Mental Health Policy Institute in the consumer credit sector shows that nearly half of people who are behind on payments say they feel harassed (49%) or overwhelmed (48%) by the volume of contact they receive from their creditors.⁵ At StepChange, we see the clear application of this issue in the energy sector. We've heard from clients who describe receiving overbearing levels of contact from their suppliers, often chasing energy arrears, leading to negative mental and physical health outcomes in some cases:

- *The client, who is vulnerable and dealing with several mental health conditions, has been receiving multiple calls a day from their energy supplier chasing debt. The client has informed the supplier of their vulnerabilities, but – despite subsequent assurances from the supplier that it would make*

⁵ Money and Mental Health Policy Institute (2023), [Debts and despair: How debt collection practices contribute to psychological harm](#)

contact less frequently – it continues to call repeatedly. The client has reported feeling that so much pressure has been put on them by the frequency of the calls that it has led them to attempt suicide on two occasions.

- The client, who has a deficit budget, said she has been receiving “17 texts per day” from her energy supplier chasing arrears. The client, who has arthritis, has completely stopped using her gas as a result, which is negatively affecting her physical health. The frequency of this contact is also causing anxiety for the client.*
- The client, who is on the Priority Services Register, said they have been getting “4-5 calls a day” from their supplier. The client already has a £6 per month payment plan in place, with total energy debt of £278, and is also paying a £200 monthly direct debit. The client felt their vulnerabilities have not been considered.*
- The client said they are receiving on average “15 calls a day” from their energy supplier regarding arrears. The client has been trying to negotiate a repayment plan, which has so far been refused. The client has 2 neurodiverse children at home and has found the whole experience stressful.*

Theme 4: Encouraging positive and inclusive innovation

We warmly welcome the retention of this theme and are supportive of Ofgem’s proposed outcomes, though we would appreciate further clarity on how the regulator intends to initiate and measure progress in this area as part of the refreshed vulnerability strategy.

The provision of energy is an essential service, and should be inclusive by design – but the current market has been shaped in a way which means many people in vulnerable situations can face significant disadvantage when it comes to access and opportunities. As it stands, and as Ofgem rightly notes, customers in vulnerable situations can face barriers to engaging with new and innovative solutions in the energy market, including cost, lack of targeted support, inability to shift energy consumption, and digital exclusion, to name a few.

We absolutely agree with Ofgem that it is vital that innovative solutions are inclusive for all consumers and that innovation is used as a tool to better meet the specific, sometimes complex needs of customers in vulnerable situations. We would welcome elaboration from Ofgem on the work it intends to do to incentivise the creation of innovative products and services which meet this ambition. For example, we would like to see concrete steps taken to ensure suppliers offer a diverse range of energy tariffs which cater to the needs of different groups, including low-income households and those with vulnerabilities which necessitate high energy consumption.

On this note, it is encouraging to see that Ofgem is also consulting on innovation in the energy retail market; inclusive design should be at the core of this work, alongside alignment to the vulnerability strategy.

We note that one of Ofgem’s proposals for defining success is lower or eliminated barriers to entry for consumers in vulnerable situations to Net Zero products and services. Here, we would encourage Ofgem to consider how the ease of access to such products and services can be significantly impacted by income – especially for those experiencing problem debt, which includes many with negative budgets.

Related to this, it is important that questions and solutions around access to Net Zero products and services also consider the role that housing tenure can play in this context. Approaching half (45%) of StepChange clients with energy arrears in the first half of 2024 rented through their council or a housing association, while over a third were private renters (36%).

Figure 2: Housing tenure among StepChange clients in the first half of 2024

	All clients	Clients in energy arrears
Board payment (not with family)	3%	2%
Living with family	13%	2%
Mortgaged	14%	10%
Other	3%	2%
Owns property outright	2%	3%
Renting – Council or Housing Association	31%	45%
Renting – private landlord	32%	36%
Shared ownership (mortgage and rent)	2%	1%

StepChange research has shown that debt problems and housing precarity – in itself a form of vulnerability – can trap rented sector tenants in poor quality homes, including issues relating to energy efficiency. Our 2023 report, “Trapped in Rent”, found that three in five (58%) survey respondents living in rented housing stated that they were experiencing at least one quality issue, affecting the extent to which their home can be classed as meeting the Decent Homes Standard. Over one in ten (15%) private rented sector respondents who experienced quality issues did not report problems with their home for fear of being evicted.⁶

The prevalence of poor-quality housing and societal barriers which prevent rented sector tenants from raising issues with landlords or housing providers make it all the more vital that Ofgem works closely with the Government to close gaps which prevent certain groups and people from accessing innovative

⁶ StepChange Debt Charity (2023), [Trapped in rent: Experiences of StepChange’s debt advice clients renting in the private sector](#)

Net Zero products and services. This includes work with the Government as it consults on proposals for private and social rented homes to achieve Energy Performance Certificate C or equivalent by 2030.⁷

As Ofgem points out in this consultation, consumers in vulnerable situations often face a poverty premium when accessing essential services, and can be especially exposed to the risks of fuel poverty. These problems are far from inevitable, and this workstream should focus on addressing and rooting them out. Overall, a key part of this work should be considerations around how the energy market can be made more inclusive by design, which would in turn reduce the prevalence of vulnerability within the system.

Q3: Do you agree with our proposal to retain ‘working with partners to solve issues across multiple sectors’ as a cross-cutting theme?

Yes, we agree with retaining this theme and believe that it makes sense for it to be cut across all areas of the new vulnerability strategy. This collaborative mentality should be embedded in Ofgem’s overall approach to vulnerability, and is fundamental in the successful delivery of the other themes and outcomes. Ofgem should continue engaging with stakeholders across a diverse range of sectors, from other regulators, those operating in the utilities and financial services industries, debt advice, other charities and consumers groups, through to the public sector.

“Partners” should also be taken to include consumers with lived experience of vulnerability, who should play a fundamental role in Ofgem’s work to ensure the refreshed vulnerability strategy is a tangible success.

⁷ Department for Energy Security and Net Zero (2024), [Home upgrade revolution as renters set for warmer homes and cheaper bills](#)

Increasing transparency and accountability

Q6: 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?

Q7: Do you agree with our proposals for reporting the findings from these presentations, and for the inclusion of the key SOR metrics and research be included?

Q8: Do you agree with our proposals for a dedicated section on our website to inform updates for the live Strategy?


Ofgem must adopt a transparent, communicative approach in how the vulnerability strategy – and the related work of energy suppliers – is helping to deliver good outcomes for consumers in vulnerable situations. It would be good to see Ofgem commit in the final strategy to regular reporting which reflects areas where tangible, meaningful progress has been made, and also highlights where work remains to be done.

We would like to see a more detailed plan for the Consumer Vulnerability Panel outlined, including further information of who Ofgem intends to onboard. We believe membership should extend beyond industry, and there should be the opportunity for other stakeholders to get involved and share feedback – including the debt advice sector. Any panel needs to be sufficiently large to get some helpful and varied feedback.

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