



Digital Power

Managing Vulnerability Policy

Revision History

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Management Control

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Regulatory Compliance

Compliance Framework	Sections of the compliance framework relative to this policy
Electricity Act 1989 Standard conditions of electricity supply license	SLC0.9, SLC26,27 and 31G

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Managing Vulnerability Policy

1. Purpose

The Managing Vulnerability Policy provides information about the commitments and conditions of Digital Power customers in accordance with the license conditions 'Electricity act 1989 Standard conditions of electricity supply license' ¹ and 'Gas act 1986 Standard conditions of Gas supply license' ².

Through this document, the Customer will refer to the Non-Domestic entity that has signed the Contract with Digital Power, and the end consumer of the Non-Domestic entity should be considered to this Managing Vulnerability Policy.

2. Scope

This document is limited to those aspects that are relevant to customers that define the key activities within Digital Power, 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 validating data, workflows, and activities, and identify where templates are required (for letters or emails) and further requirements/specifications are needed.

3. Managing Vulnerability

Digital Power does not want to impact any customer adversely, and this is more pertinent to those customer who make be supporting an end consumer that potentially may be in a vulnerable situation defined below:

“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.
- When applying the criteria listed above in all sections, do so in a manner that considers

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>

each customer's vulnerable situation.

- Ensure that the appropriate controls are in place to reduce the likelihood of impact to the end consumer.

There are various methods by which these controls can be ensured.

1. through employee awareness
2. the business systems deployed
3. the supporting business processes to prioritize customer service.
4. ensure that their customers have access to support and assistance when needed.

This can be achieved by providing multiple communication channels, responding promptly to customer inquiries and complaints, and offering training and education to help customers make informed decisions about their energy use.

It is Digital Power responsibility to review and prioritize the situation but consider the other factors include;

- **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.

At this time Affordability, as defined below, is not considered as these are business-only (Non-Domestic) contracts:

- **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.
- **End Consumer:** these are under the management of the Non-Domestic Customer, and Digital Power should seek assurances that the appropriate management controls are in place to ensure continuity of supply.

3.1 Priority Service Register Information (SLC26):

Priority Services Register (PSR) is a service Digital Power offers customers who are serving vulnerable end consumers who may need additional support during power outages or other emergencies.

Once a customer is registered on the PSR, Digital Power 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.
- 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 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.

The PSR is available to vulnerable customers who may need extra support, and Digital Power has defined the eligibility for PSR as stated below:

- 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 may also consider other factors when determining whether a customer is eligible for the PSR.

- Digital Power 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 shall share specific information with third parties contracted to Digital Power (Meter operators, Ofgem, Data Retrievers for example) where consent has been given by the customer.

3.2 Proactive Communication (SLC27).

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

Channels that can be utilised but not limited to are;

Personalised messaging: With targeted messages to customers highlighting the importance of energy access and support.

Dedicated customer support channels: Established dedicated customer support channels, which are easily accessible and prominently advertised to customers.

Collaboration with advocacy groups: Signposting to charities or organisations focused on supporting vulnerable populations, to jointly raise awareness about energy access and support.

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

Digital Power 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.

Once identified, Digital Power 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, and its effected customers, to ensure Digital Power continue to meet their Supply License Obligations.

Any material changes should be made by adhering to the latest Change Management Policy

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