

Consultation Response

Ref 1916

Department for Business Innovation & Skills call for evidence on improving the consumer landscape and quicker switching

June 2016

All rights reserved. Third parties may only reproduce this paper or parts of it for academic, educational or research purposes or where the prior consent of Age UK has been obtained for influencing or developing policy and practice.

Phil Mawhinney
phil.mawhinney@ageuk.org.uk

Age UK
Tavis House
1-6 Tavistock Square
London WC1H 9NA
T 0800 169 80 80 F 020 3033 1000
E policy@ageuk.org.uk
www.ageuk.org.uk

Age UK is a charitable company limited by guarantee and registered in England (registered charity number 1128267 and registered company number 6825798). The registered address is Tavis House 1-6 Tavistock Square, London WC1H 9NA.

About this consultation

In May the Department for Business, Innovation & Skills published a call for evidence on improving the consumer landscape and quicker switching across a range of consumer markets.¹ The findings will influence the Better Markets Bill later this year.

Introduction

Age UK is the country's largest charity dedicated to helping everyone make the most of later life. We help more than 5 million people every year, providing support, companionship and advice for older people who need it most.

Age UK welcomes the opportunity to respond to this consultation. Our main points relate to switching and older people, particularly in the energy, telecoms and banking markets. We also make some brief points in response to the questions on the consumer landscape.

Key points and recommendations

1. We support the continued existence of sector specific consumer representative organisations but they are most effective when they are supported by a sustainable infrastructure of generalist advice agencies. The Government needs to take a strategic approach to maintain the infrastructure across government departments, pooling funding, and enabling best practice.
2. In principle we welcome making complaints data more widely accessible, but putting too much focus on online complaints risks ignoring the experience of people who are not online and is no substitute for proper monitoring and enforcement.
3. Older people are less likely to switch in energy, telecoms and banking.² We support faster switching but the Government also needs to tackle other barriers to switching. This should involve the Government conducting further research to understand the wide range of reasons for lower switching rates, and develop the support needed.
4. For example, the Government (and service providers) should understand the vulnerable circumstances that make switching difficult, including being socially isolated and/or bereaved, living with physical or mental health conditions or sensory impairments, and having caring responsibilities.
5. Given that digital exclusion is a key barrier, the Government should add a switching principle on accessibility: *Consumers should be able to access comparison information and switching services through a range of channels, including telephone.*
6. There is a hugely important role for various third parties to help vulnerable people switch, including price comparison websites, Energy Advisors, relatives and Attorneys. The Government should support the development of these support providers.
7. Renewal is a key opportunity to prompt consumers to engage or seek support. Supplier communications should more strongly indicate the scale of 'overpayments'³ resulting from staying on default tariffs.
8. The Government should acknowledge that some people will not switch, and ensure that prices are not set at disproportionately and unfairly high rates. We are concerned that as suppliers in different sectors become more advanced in their use of customer data there will be an increase in the use of complex 'price optimisation', resulting in increased prices for less active consumers. Regulators should proactively research and monitor this issue and consider possible interventions.

Part A: The consumer landscape

Q1. Are there problems with the current provision and routes to advice and information for consumers in these sectors?

Q2. If yes, what are these problems and how can provision be improved?

9. Specialist advice and advocacy is important and we support the continued existence of such organisations as separate bodies. However, as they are separate and specialist, they are at their most effective when they are supported by a sustainable infrastructure of generalist advice agencies, such as Age UK, which can signpost people to them but also work with those agencies in supporting consumers who are particularly vulnerable or hard to reach.

10. For example, Age UK's information and advice reached around 5.9 million people in 2015-16, and our Advice Service team dealt with over 259,000 enquiries. This reaches many people who are not online, or are living with long-term conditions and poor mobility. Our advice service signposts callers to external organisations for expert advice – in May 2016 we did this for over 3,600 people.

11. As a prime example of how generalist and specialist services can work together, Age UK's recent Energy Advisor pilot provided in-depth support to older people. The support included home visits, including in rural areas, which meant the cost was high, even though the service achieved successful outcomes. This work was funded through energy suppliers. We are currently looking at how we can maximise the efficiency of this service by improving how Energy Advisors work with generalist advisers, and this model of strategic alliances between generalist and specialist should continue.

12. However, this model depends on a sustainable generalist advice, which has been threatened by cuts in local authority budgets. We acknowledge the pressure on public funding and appreciate that advice agencies are looking to be more efficient but budget cuts of this scale are short-sighted and the Government needs to take a strategic approach to maintain the infrastructure across government departments, pooling funding, and enabling best practice. As just one example, a huge step forward would be to find ways of enabling longer commissioning periods, as organisations that are funded on an annual basis are likely to find it hard to recruit and maintain staff, leading to significant wastage.

13. BIS should learn from the current Government consultation on publicly-funded pensions guidance, debt advice and money guidance⁴ to ensure that consumer advice and information is effective.

14. Given the scale of change in the consumer advice landscape over recent years it is important that the Government monitor advice provision to ensure there are no significant gaps and that resourcing is adequate.

Q3. Are there problems with the way that consumers are represented in these sectors?

Q4. If yes, what are these problems and how can it be improved?

15. Although centralised consumer representation may have attractions, it is only effective if it is properly resourced, fully independent, accountable and transparent. We therefore

support the specialist representation provided by the various existing sector-specific bodies. Their closeness to the problems of consumers in these industries means that they can quickly highlight problems with industry regulators, helping tackle problems at source by requiring companies to treat consumers fairly.

Q8. Is there scope to make consumer complaints data in these sectors easier to access and more widely available?

Q9. If yes, how can this be achieved and what protection should be included?

16. In principle we welcome making complaints data more widely accessible, as it can potentially support consumer advocacy. The pros and cons of publishing firm-specific data have been the source of much debate in the past, but the experience of doing so for financial services (both by the FCA and FOS) has shown that it is possible to do this responsibly.
17. However, online complaints data is a slightly different matter in that it is not necessarily moderated. We would welcome further discussion of what data might be aggregated and how this can be achieved, given that a condition for doing so would be some level of standardisation in the data collected. Another issue is the type of industry – whereas people may be happy to rate their insurer online, they may be concerned about rating a provider who could identify them or potentially withdraw services (as in a residential care home).
18. Nor is online complaints data a substitute for proper monitoring and regulation, given that 4.5 million people, many of them older, are no longer online. Therefore, there is a risk that the experience of consumers who are offline – and in many cases vulnerable and disadvantaged in the marketplace – is not reflected in online complaints. If greater reliance is placed on online complaints, it must be accompanied by ways of capturing complaints offline.

Q12. What more can be done to get consumers their money back and give them information on a business' past performance when consumers have suffered detriment in these sectors?

19. We would certainly support greater openness about companies that have broken the law. However, we are concerned that there is a need for stronger enforcement mechanisms. Trading Standards capacity has decline sharply in recent years:

*'almost all trading standards departments have experienced sharp cuts in their budgets and most now operate with about half the number of staff that they employed five years ago.'*⁵

Part B: Consumer switching

20. Age UK welcomes moves towards quicker switching, as it will tackle one of the barriers to switching and result in some consumers paying less. We support the aim to have as many active customers as possible, and the Government's acknowledgement that there are also vulnerable customers, many of whom are unable to become active.

21. Overall, we also argue two main points –

- i. Many older people face **barriers to switching** other than switching speed – some of which have been given relatively little attention – that require solutions.
- ii. Making switching easier is important but not an adequate solution to the problem of vulnerable consumers – including many older people – paying **disproportionately high prices** for essential services they rely on for a decent standard of living.

22. It is vital for older people that they can pay affordable prices for energy, telecoms and banking; these are essential services, not luxuries. For example, it is particularly important for older people to use enough energy to keep warm and protect their health. Many people respond to high prices by using less energy, harming their health; we estimate that nearly 1 million people aged 65+ have had to cut back on food shopping over recent years to cover the cost of utility bills.

Barriers to switching

23. While many older people are active consumers who regularly compare and switch, some live in circumstances that make switching difficult. Older people are, overall, less likely to switch. For example, in the energy market people aged 65+ are more likely to have never switched or think it is impossible.⁶

24. In our response to BIS in December 2015⁷ we set out a number of barriers facing older people, including:

- Digital exclusion
- Complexity in making comparisons
- Lack of trust in the long-term benefits of switching
- Fear of disruption
- Restricted access and age discrimination

25. We won't repeat these points at length, but below we discuss digital exclusion and highlight other barriers.

Q.14. What would be the benefits and drawbacks to consumers of quicker (7 day) switching?

26. We welcome quicker switching as it will contribute to consumers feeling more confident about the process. However, we ask the Government to recognise that there is a limit to the impact of speeding up switching, and to acknowledge and tackle other barriers.

27. One such barrier is **digital exclusion**. Three in five (61%) people aged 75+ are not online;⁸ this is a large proportion of people who cannot access online information on

comparing and switching. People from lower socio-economic backgrounds are even more likely to be offline – see the table below.⁹

% OF PEOPLE WHO ARE NON-INTERNET USERS

	All	16-24	25-34	35-44	45-54	55-64	65-74	75+
AB	5%	0%	0%	1%	0%	4%	12%	35%
C1	8%	2%	0%	3%	6%	6%	22%	58%
C2	20%	0%	4%	8%	3%	26%	46%	80%
DE	22%	7%	6%	16%	15%	32%	35%	81%

28. We support the efforts to extend broadband coverage and build people’s digital skills. While these measures are ongoing it is vital to remember that there will still be people not online, for whom support to compare and switch must be provided in alternative ways. Given this, we argue that the *accessibility* of comparison information and switching services should be included in the principles set out by BIS. We repeat our proposed principle from 2015 that:

Consumers should be able to access comparison information and switching services through a range of channels, including telephone.

Vulnerable circumstances

29. Some people live in circumstances where switching may not be a realistic expectation, including:

- Living alone, socially isolated and/or bereaved.
- Living with sensory impairments and/or physical or mental health conditions, including dementia and those that mean they are housebound.
- Being in and out of hospital.
- Having caring responsibilities for a partner/relative.
- Low income, and/or debt.
- As a result of some of the above, feeling overwhelmed, stressed and unable to perform (new) administrative tasks.

30. Note that the majority of these vulnerable circumstances do not presuppose low incomes. It is important that the Government considers the reality of people facing one or more of these challenges, and is realistic about their (in)ability to switch. Support from various ‘switching assistants’ can be invaluable to people in these circumstances (see Q.23 below).

31. Many older people perceive various barriers to switching. In energy, people aged 65+ are more likely to think ‘switching is a hassle’ and that they don’t know how to switch.¹⁰ The Government should recognise that people describing switching as a ‘hassle’ may be facing some of the vulnerable circumstances listed above, and avoid assuming that such people simply cannot ‘be bothered’ to switch.

32. Indeed, an Age UK Energy Advisor (see Q.23 below) who has provided in-depth switching support to older people in their home, explained that the combination of the length of the call and call queuing, the complexity of the information required of them,

struggles with navigating phone menus, and difficulties hearing or speaking are in many cases the concrete barriers to switching.

33. More positively, the experience of Age UK Energy Advisors showed that many people were positive about the experience of switching with the required support provided. Many people who used the service shared their experience with friends and neighbours through word of mouth.
34. More broadly, quicker switching will not tackle the problem of some people being worse off as a result of switching. For example, some consumers switch energy tariffs only to pay more because of the variation in unit costs and standing charges or the loss of the Warm Home Discount.

The scale of price differentials

35. While we welcome faster switching and tackling other barriers, we believe there will *continue to be* a significant proportion of consumers who are unable to switch. The Government should consider how to ensure they are not paying hugely disproportionate high prices.
36. Citizens Advice at a recent event described a client they helped: an older woman struggling to heat a large home, with various health conditions. When advisors helped her switch energy supplier, she saved £700 per year. She had not switched in years. This 'overpayment' for energy is more than twice the £325 average saving promoted by Ofgem,¹¹ and is likely to affect many older people (who are less likely to switch).
37. More widely, there is a group of energy consumers who have not switched in ten years¹² who may be overpaying by thousands of pounds (e.g. £700 pa x 10 years = £7,000). This is disproportionately high, and the Government should go beyond efforts to improve switching to tackle it. This is not a niche issue; 'around 70 per cent' of the Six Large Energy Firms are on the standard variable tariff.¹³
38. Consumer scepticism may be acting as a break on switching – 45 per cent of consumers 'suspect that smaller suppliers would try and reel them in with a cheap deal, only for costs to work out more expensive in the long term.'¹⁴ This raising of prices for existing customers may make some people feel that switching behaviour is not rewarded in the long-run.
39. We are also concerned that as suppliers in different sectors become more advanced in their use of customer data there will be an increase in the use of complex 'price optimisation', resulting in increased prices for less active consumers. Regulators should proactively research and monitor this issue and consider possible interventions; some regulators in the US have banned price optimisation in insurance.

Taking a multi-sector approach

40. We share the Government's interest in reducing switching times to 7 days *across all sectors*. In order to fully understand a consumer's perspective, the Government should assess the *cumulative* challenges. For example, thinking about a consumer

considering switching across energy, telecoms, banking and insurance (and possibly water in future):

- How easy or difficult is it to manage these *multiple* switches?
- Is there a risk of choice paralysis or inertia, and how can we overcome these?
- Are there ways to streamline these multiple switches? e.g. 'switching assistants'/brokers that deal with more than one sector.
- How do people prioritise services and how do they differ in terms of price, potential savings and difficulties with the switching process? (Research shows that consumers prioritise shopping for utilities less than for leisure goods/activities.¹⁵)

41. Lastly, there is a risk that a quicker switching process, while welcome, may not have as much impact as hoped. As pointed out in the BIS response to its earlier consultation:

*'The qualitative data suggests that issues with the length of the process may occur at an earlier stage. Consumers felt that it could be time-consuming and difficult to research the different deals and that they were prevented from engaging in the switching process because of the (perceived) time it took to consider these.'*¹⁶

42. Indeed, FCA research into the Current Account Switching Service highlights limits in the impacts of faster switching.¹⁷

Framing

43. A final point on third parties is the need to frame switching in a way that makes it relevant to older people. Some people think of energy as a public utility rather than something to be compared and bought, because for most of their life it was a public utility and not something they shopped around for. One Age UK Energy Advisor described how they try to shift people's thinking on this:

'When I go out and speak to people, I try to break it down into very simple language. I try to use analogies that when we are talking about potentially switching and going to a different provider... it's exactly the same as going to the shop, going to Tesco and finding beans, but then going to Asda and finding beans cheaper.'

44. The programme showed that, in some cases, reluctance to switch energy can be overcome by likening it to shopping and comparing prices in supermarkets.

[Q23. What would be the advantages and drawbacks of banning terms and conditions that prevent the consumer from allowing third parties to manage consumers' accounts and switch for them?](#)

45. Given the barriers and vulnerable circumstances many older people face, there is an important role for various third parties, including price comparison websites and energy advisors, to arrange switching for consumers. We encourage the Government to look closely at examples from other countries to encourage their development in the UK.

Price Comparison Website (PCW) accessibility

46. Given the growing importance of PCWs to help consumers sort through huge numbers of tariffs/options, it is vital that people in vulnerable circumstances are able to access them. We noted above that the majority of people aged 75+ do not use the internet. We know of instances where PCWs have provided information by phone and post, but ask

the Government to require PCWs to be fully accessible. In the case of energy, this may involve extending the PCW Confidence Code to apply to telephone-based customer interactions, so that consumers switching by phone do not miss out on the best deals (an issue highlighted by the Energy & Climate Change Committee¹⁸).

Trust and energy advisors

47. In considering consumers handing over personal details to third parties it is crucial to address trust issues. Switching assistants need to be trusted for people to use them. Only 1 in 20 (5%) people aged 65+ trust switching websites, and 1 in 10 (10%) trust their energy supplier.¹⁹ The highest levels of trust in our survey were reserved for Age UK (26%), Citizens Advice Bureau (33%) and family or friends (43%). Older people (75+) and those without internet access are especially likely to trust friends/family most.

48. Age UK ran a Community Energy Programme between 2015 and 2016, involving fully-trained Energy Advisors going to people's homes to deliver a range of energy support, including help to switch. Often, the advisor would phone the energy supplier to arrange a switch there and then. A total of 395 older people received support to switch, saving an average of £203 per year. In some cases people saved over £400.

49. Feedback from advisors highlights the importance of having face-to-face conversations and building a trusting relationship in order to reach the point of switching. One said:

'Half the battle... is just making customers relaxed and feeling comfortable to just talk.'

50. Indeed, older people are notably more likely than younger people to have switched (in the past) via a salesperson at the door.²⁰ While we are not arguing for doorstep selling to be reinstated, as it clearly resulted in high levels of misselling, we do think there are important lessons to be learned on the role of personal interaction.

51. More broadly, the Energy Advisor programme highlights some of the reasons people seek an advisor, including (backed up by the quotes following):

- A lack of confidence or understanding of switching generally or specific information like energy consumption (and difficulty accessing meters).
- A lack of access to, or confidence using, the internet.
- Feeling intimidated by long and complex conversations on the phone with suppliers.
- Phone systems that are difficult to use for people with speaking, hearing or mobility impairments.
- A feeling of being overwhelmed by responsibilities, including caring for family.

'I am now paying a lot less for gas and electric... It was nice to have someone sort things out for me as I am not good at this sort of thing.'

'I was worried about how to go about changing. I hate having to phone, I am 79 and my confidence isn't very good. [I] find it hard to understand.'

'At my age I'm very stressed by computers... [It] has been very stressful. It was a very kind, helpful young man who organised the change. I can't imagine how an elderly person can cope [without this support].'

'Age UK's energy advisor... was very helpful and dealt with [the] energy transfer to another energy supplier whilst I was at their office. This was [helpful] to me as I am my husband's carer and therefore have to deal with everything.'

52. Reflecting these barriers, many clients wanted advisors to call and speak to their supplier on their behalf. It is likely they would not have contacted their supplier otherwise. Indeed, one advisor said:

'When we finish the phone call they tell me they wouldn't have bothered going through all that on their own if they had known what was involved.'

53. In light of this, the Government should support the development of – and indeed find ways to resource – a range of supportive third parties. These must address these barriers and vulnerabilities to be effective in helping more (vulnerable) people switch.

Delegated authority to switch

54. We encourage the Government and service providers to pursue the idea of consumers being able to nominate relatives or friends to arrange a switch on their behalf. Some people do so via Powers of Attorney (PoA), although we are aware of cases where this is difficult; see the example in Box 1²¹ and note the stress caused by the situation. We ask the Government to look at how companies can make switching via PoA smoother, learning from best practice in financial services.

Box 1: Trying to switch current accounts with a Power of Attorney

I have PoA for my 85 year old, dementia-suffering mother which has just been granted but not used. I want to switch her current bank to another and thought it would be fairly straightforward to do online. And it was until I got to the very end where it requires her to visit a branch with proof of her identity (also a problem as she has no driving licence, passport, identity card etc.) and, as she is completely housebound, this is impossible.

I am at my wits end with all this. Caring for someone with dementia is hard enough without these further complications.

Q24. Should Government explore whether all regulated sectors should provide tariff and T&C data in an open, standard format?

Q25. How could this data be kept up to date and how helpful would this be to consumers?

55. Yes, we encourage the Government to explore this idea, given its potential to make switching easier for consumers. This is important in light of consumer confusion. For example, nearly half (48%) of consumers say they understand the range of energy tariffs available to them not very much or not at all.²²

Q26. What are the benefits and drawbacks to consumers of rolling over contracts?

56. Rolling over contracts can have real value for people if it means they do not lose a valuable service. However, many people in vulnerable circumstances – including living with impairments or mental or physical health conditions – struggle to shop for and arrange a better deal. This could be an argument for capping prices for specific,

identifiable customer groups in these circumstances, so they continue to receive the essential service without being ripped-off. For example, the CMA has proposed transitional price caps for people with pre-payment energy contracts.

Q27. Should any renewal paperwork sent to consumers always include reasons for any cost increases?

Q28. Should any renewal paperwork sent to consumers always include the price that would be offered to a new customer in exactly the same circumstances?

57. We are concerned about the lack of transparency in price increases, so support the idea that renewal paperwork should include reasons for increases. We also support the idea that paperwork should be required to prominently state any increase in price since the previous year and the price that would be offered to a new customer in the same circumstances. We make two additional points.

58. Firstly, there are limits to the behaviour change we can expect to see from providing consumers with more information. Energy consumers receive regular reminders (via bills) of cheaper tariffs and this is felt to have had limited impact on switching.

59. Secondly, the Government should consider creative ideas for how to maximise the opportunity at renewal to engage consumers. This could include (stronger) prompts for people to contact independent sources of advice, or suppliers directly contacting a customer's nominated third party (e.g. relative or Attorney) to prompt switching.

60. Another idea is that suppliers could rename their default tariffs as something more attention-grabbing and negative (e.g. 'Poorest Value') to encourage consumers to engage. A recent report said:

*'There is also some evidence that presenting shopping choices to consumers that emphasised the potential losses from staying with your current supplier rather than potential gains from switching supplier (as is typically the case) may have some influence on engagement with the market. However, the effects were small...'*²³

61. Given the severe detriment that can accumulate over consecutive years of not switching, another idea is that suppliers point out the scale of multi-year 'over-payment' at renewal. (See the example above in para 36.) Alternatively, renewal communications (or regular bills) could display an estimate of total overpayments over the course of the next five years (for example) by staying on default tariffs compared to a cheaper tariff.

62. We are aware that BIS is researching how 'trigger points' can be used to prompt consumer engagement, with contract renewal being one. Other relevant trigger points might include:

- Moving house (downsizing).
- Bereavement, which can trigger various bereavement process, such as in banks.
- Going to or returning home from hospital. (There are schemes to improve the energy efficiency of vulnerable people who have returned home from hospital.)
- First receipt of pensions (state or private), and pensions advice (e.g. Pension Wise).
- Retirement from work, and/or attendance of a pre-retirement course.

-
- ¹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/527985/bis-16-259-helping-consumers-get-a-better-deal.pdf
- ² [CMA investigation](#) (energy), Age UK polling research (banking), [Ofcom research](#) (telecoms).
- ³ 'Overpayments' being the amount a consumer pays in excess of what they could be paying if they switched to a cheaper tariff.
- ⁴ <https://www.gov.uk/government/consultations/public-financial-guidance-review-proposal-for-consultation>
- ⁵ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/420218/bis-15-139-the-impact-of-local-authority-trading-standards-in-challenging-times-r2.pdf
- ⁶ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/404867/Updated_Issues_Statement.pdf
- ⁷ http://www.ageuk.org.uk/Documents/EN-GB/For-professionals/Policy/housing/Ref_3615_Age_UK_%20response_%20to_BIS_switching_consultation.pdf?dtrk=true
- ⁸ Internet users in the UK: 2016, ONS, 2016
- ⁹ Table of internet usage stats from Ofcom, 2016
- ¹⁰ https://www.ofgem.gov.uk/sites/default/files/docs/2015/09/customerengagementreport2015_final_for_publication.pdf
- ¹¹ <https://www.ofgem.gov.uk/publications-and-updates/switching-increases-customers-respond-savings-325>
- ¹² According to a speaker from First Utility at the recent launch of the Energy Switch Guarantee, 7.6.16.
- ¹³ https://assets.publishing.service.gov.uk/media/559fc933ed915d1592000050/EMI_provisional_findings_report.pdf p.20
- ¹⁴ <http://www.populus.co.uk/wp-content/uploads/2016/05/Populus-Energy-Switching-Final-singles-Screen.pdf>
- ¹⁵ <https://www.citizensadvice.org.uk/Global/Public/Policy%20research/Documents/Policy%20publications/Consumer%20Publications/Consumers%20Hierarchies%20of%20Priorities%20report.pdf>
- ¹⁶ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/526672/bis-16-155-government-response-switching.pdf
- ¹⁷ <https://www.fca.org.uk/static/documents/research/making-current-account-switching-easier.pdf>
- ¹⁸ <http://www.publications.parliament.uk/pa/cm201415/cmselect/cmenergy/899/89903.htm>
- ¹⁹ Age UK Energy Switching Omnibus, 2012
- ²⁰ https://www.ofgem.gov.uk/sites/default/files/docs/2015/09/customerengagementreport2015_final_for_publication.pdf
- ²¹ (Source: Age UK information and advice service query)
- ²² https://www.ofgem.gov.uk/sites/default/files/docs/2015/09/customerengagementreport2015_final_for_publication.pdf p.44
- ²³ <https://www.citizensadvice.org.uk/Global/Public/Policy%20research/Documents/Policy%20publications/Consumer%20Publications/Consumers%20Hierarchies%20of%20Priorities%20report.pdf>