



Economic Regulation Team
Department for Business and Trade
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Dear Economic Regulation team

Age UK strongly supports the Department for Business and Trade's proposals for a unified Priority Services Register (PSR) across the water, telecoms, and energy sectors and for cross-sector improvements in awareness raising efforts to better promote the availability of affordability schemes.

Existing PSRs in water and energy are crucial lifelines for many thousands of older people, especially during emergency situations like water and power outages. Progress with data sharing between water and energy providers is commendable and represents a good starting point for this more fundamental reform. Equivalent support in the telecoms sector protects those who need consistent un-interrupted access to a telephone or internet connection, including people with a telecom enabled care alarm.

A unified PSR across these essential services would reduce the risk of an older person missing out on priority support. A combination of customer service touchpoints moving online alongside a lack of public awareness of PSRs, means many older people remain unregistered with their providers.

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Age UK is a charitable company limited by guarantee and registered in England and Wales (registered charity number 1128267 and registered company number 6825798). Registered address: 7th Floor, One America Square, 17 Crosswall, London EC3N 2LB. VAT number: 710 3843 66. The Age UK Group consists of Age UK and its subsidiary companies and charities. ID204775 01/22

A single PSR covering all essential services would mean that older people would only need to register once. This would enable easier access to some pensioners with vulnerabilities who currently find it difficult to register with multiple providers, and it could also be used as the basis for a wider marketing campaign to encourage more registrations from people who otherwise would not register with any.

Ultimately, the goal should be to get as many people as possible signed up to a PSR, and we believe that the regulators should set targets for firms in their respective industries. This should be achieved through establishing a seamless customer service journey, that feeds into an improved customer experience overall.

Despite our support, Age UK is keen that the Department for Business and Trade fully accounts for the risk of data breaches and put in place comprehensive mitigations. Many older people are understandably concerned about data privacy, with the increased prevalence of cost-of-living scams only heightening their concerns in essential service markets. The Department rightly cites the importance of customer confidence and trust. Nothing would undermine this trust more than sensitive personal information being misused or stolen. The Government, regulators, and firms must ensure that the data owners for the unified PSR conform with the maximum level of data security protocols to avoid a breach. Prior to implementing any changes, the Department should conduct a review of the applicable privacy laws and regulations and determine whether this is the right framework for proceeding.

The limitations of the PSR must also be recognised. Firms need to be more ambitious than the Register's standard obligations to better serve their customers. We strongly agree with Ofwat's recent recommendation that providers should go beyond just recording the medical conditions of customers with vulnerabilities and should instead record their needs as well, especially during an emergency. We also welcome the Government's proposal to consider whether components of financial vulnerability could be included within the PSR and we would welcome the opportunity to work with the Department for Business and Trade on how best to achieve this.

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We also support the Government's proposals for improved joined up working between Government and non-government agencies to ensure better promotion of affordability schemes in essential services. Age UK has extensive experience of delivering affordability information and advice and we know all too well the importance of promotional work in getting the message out to consumers. We welcome the commitment to better promotion of available schemes and wish to reinforce the importance of firms providing relevant materials in online and offline formats, to ensure digitally excluded older people are able to benefit fully.

We look forward to working with the Government on these proposals as they develop and are confident that a unified PSR across essential services will represent a significant improvement on existing provision for older people with vulnerabilities.

Yours faithfully,

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