

Consumer attitudes to Third Party Intermediary Protections

February 2020



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Bringing the voices of communities into the heart of organisations



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The headlines...

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Participants had low trust in the energy market. Some had had – or worried about – poor experiences of switching, leaving them out-of-pocket.

Participants identified extra challenges amongst people in vulnerable circumstances. These either stopped them switching, or meant they were more likely to experience detriment.

PCWs were widely recognised and seen as mostly benign/ low risk (though few knew about partial market view and commission-based recommendations).

There was limited awareness of auto-switchers. In theory, they offer benefits, especially for less-engaged consumers. However, seen as more risky because of level of control

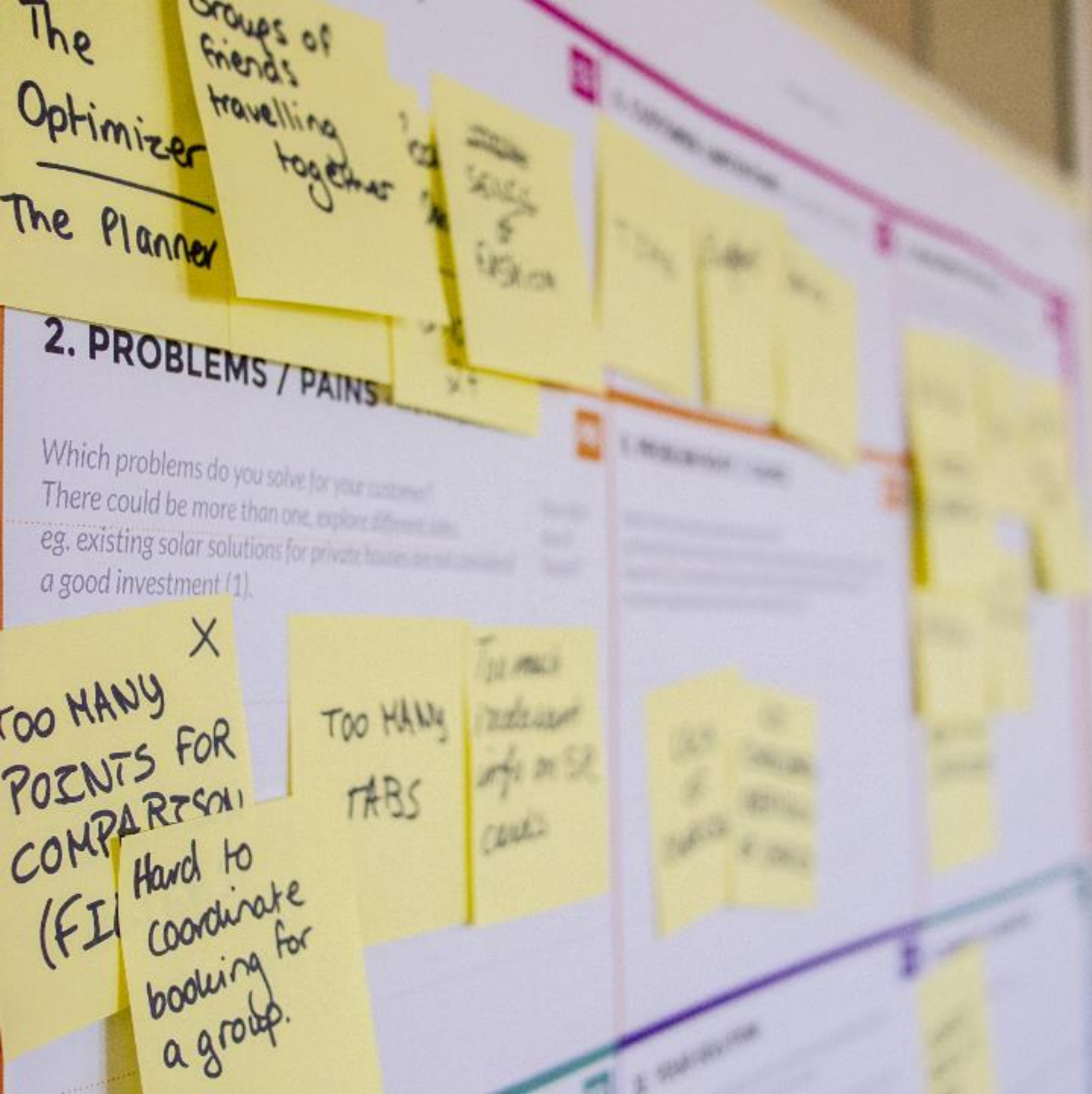
There was limited understanding of regulation and consumer advocacy, but participants expected greater protection in this market because energy is essential, complex and high cost.

Participants were surprised at the limited regulation of TPIs. They expect to see greater consumer protection, especially for new TPIs that have more control over decisions and data.

People in vulnerable circumstances found it harder to understand options and to access redress and advocacy. They need extra support to benefit from changes in the energy market.

Citizens Advice's role in the energy market was welcomed, but no-one knew about it. They wanted Citizens Advice to be more visible and to have a role in supporting people in vulnerable circumstances.





2. Objectives and approach

The context for the research

- Citizens Advice is the statutory advocate for energy, representing consumers' interests in the energy market. Recent years have seen significant changes in the energy market, especially with the role that third party intermediary companies (TPIs) are playing in the market:
 - Price Comparison Websites (PCWs) have been around for a while, and provide consumers with a view of the market so that they can choose a deal that works best for them.
 - Newer TPIs, such as Flipper and Look After My Bills, offer auto-switching services, which mean they have greater involvement in making decisions on consumers' behalf, and in processing their personal data.
- In the coming years we are likely to see a range of developments in how consumers choose, use, and interact with energy, TPIs and the energy market.
- In this context, regulators, government and consumer groups all have a keen interest in how TPIs will work in the future. Citizens Advice commissioned research with consumers to understand what they think, need and want in this changing market. The research is intended to provide evidence to help Citizens Advice advocate on consumers' behalf for an appropriate regulatory model and effective consumer protection.



Research objectives

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The overarching objective was to explore consumer attitudes to consumer protections relating to Third Party Intermediaries (TPIs) in the energy market:

What are customers' expectations of protections; namely do they expect:

- Protections that are unique to energy?
- Alignment across sectors or within sectors?
- Access to an ombudsman or other type of alternative dispute resolution?
- Specific protections for vulnerable audiences?

How should protections afforded to customers be communicated?

- What is the role of kitemarks?
- What information about TPIs is required?

What is the role for Citizens Advice?

- Would an independent not-for-profit TPI give consumers more confidence?



Our approach

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3 x 1-day workshops

- **Stirling** – 10 participants (19/11/19)
- **Cardiff** – 10 participants (25/11/19)
- **Coventry** – 19 participants (28/11/19)

9 x 90-minute face to face interviews and 1 telephone interview with people in vulnerable circumstances in Nov/Dec 2019

Follow up online task

Video reflections from 7 workshop participants

With people who are less likely/able to attend or participate in a workshop

Further details of workshop and interview participants in appendices

Workshop participants recruited in order to represent diverse lifestyles and experiences. They included:

- People of different genders, ages, ethnicities & social classes
- Ranged from those who had recent experience of switching energy provider to those who had never switched
- All were responsible for paying the energy bill and selecting supplier
- All had regular access to the internet



The fieldwork – how we introduced people to complex ideas and explored their views

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We chose a deliberative approach over standard-length focus groups. This meant we could introduce participants to the complexity of the issues, share information and ideas, and giving them time to contemplate develop informed opinions.

Spontaneous views and experiences in the energy market

Experience and awareness of consumer protection mechanisms

Information on possible developments in the energy market

Spontaneous responses

Briefing on existing mechanisms of consumer protection in energy

Development of high level principles for protecting consumers in the future energy market

Discussion of role of Citizens Advice as consumer energy advocate

Exercises on needs of consumer protection in a new energy market



We used animations and films to explain new ideas and bring them to life.

Depth interviews followed a similar flow, but with handouts adapted and explained to meet interviewees' needs.

All fieldwork materials are available separate to this report



A note on reporting

- This report collates findings from all workshops and interviews:
 - We have drawn out differences where these occur, though there was a high degree of consistency in findings from the three workshops;
 - The specific findings relating to people in vulnerable circumstances are presented separately (indicated by slides with a purple background).
- We have included anonymous, direct verbatim quotes from people to illustrate points we make;
 - Please note, the interviewee who was Deaf uses BSL to communicate, so quotes from her are the words of her interpreter.
- In the appendix, we have included pen portraits of people in vulnerable circumstances who took part in interviews. We have used false names and stock photos to protect their identities.
- We have created a reel of video clips where people share their thoughts having had time to reflect after the workshops. This is available separately to this report.

Some of the abbreviations we use in this report include:

- ADR: Alternative Dispute Resolution
- BSL: British Sign Language
- PCW: Price Comparison Website
- TPI: Third Party Intermediary



Impact of behavioural biases

The behavioural science evidence base demonstrates that **consumer behaviour is influenced in ways of which we are unaware.**

It also reveals that, though we like to think we behave rationally, our behaviour is influenced by a variety of **cognitive biases and mental shortcuts.**

The result of this is that we often **don't make optimum choices** and we behave in ways which aren't necessarily in our best interests.

We know that consumers **do not always weigh up all the costs and benefits** of choices, that they **respond more to losses** than gains, that they **place greatest value on the immediate future** and that they are **heavily influenced by those around them.**

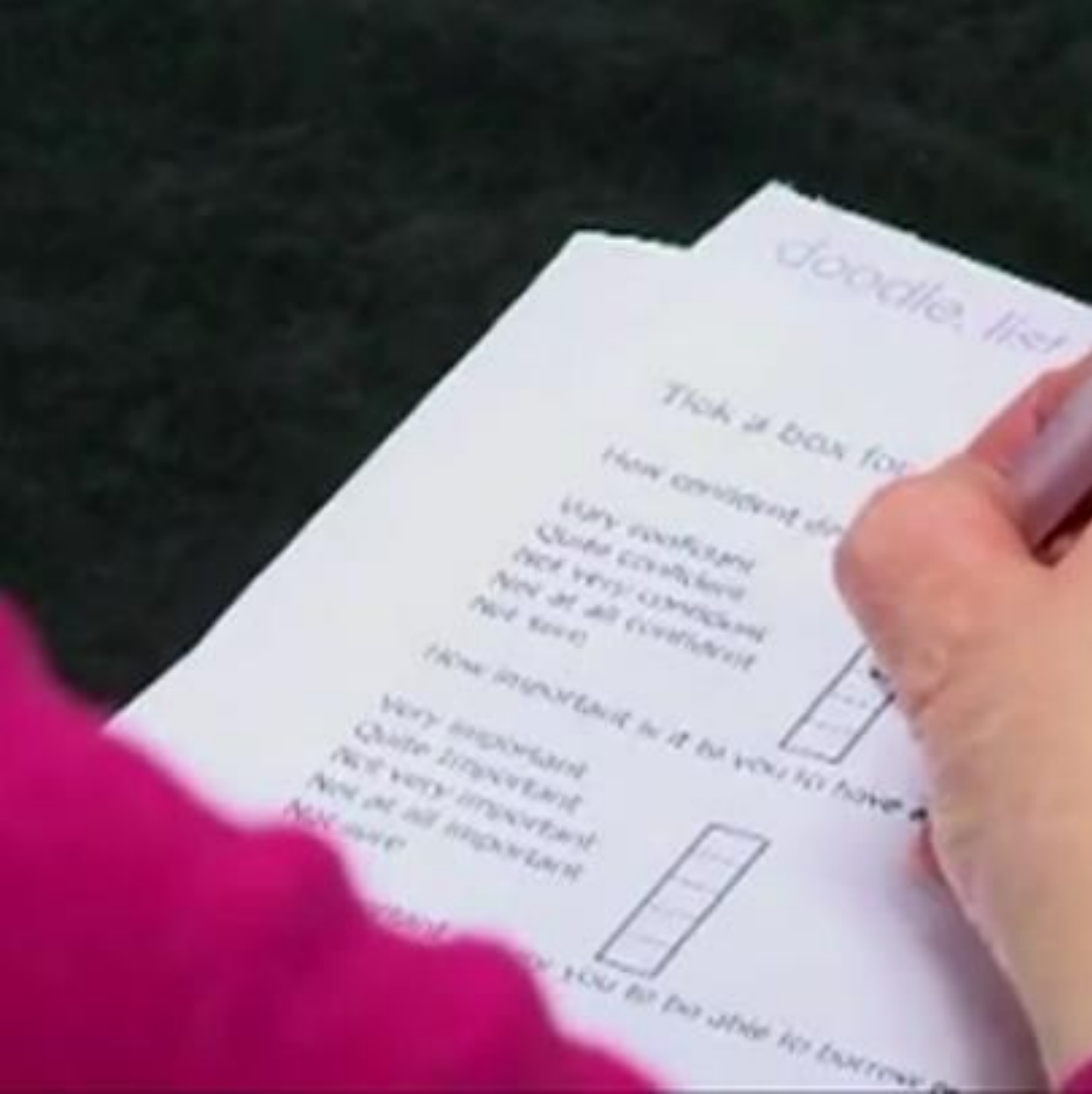
This means that what participants say may not reflect how they actually behave....

...and their response to TPIs and protections may be different in the real world

Mindful of this, moderators and interviewers were able to gently challenge consumers (based on their current behaviour) about what they said they would do in future....

...and researchers have been careful in the analysis, interpretation and reporting of responses to caveat any claims of future behaviour.





3. Context

Participants' spontaneous views of the energy market, consumer protection and switching.

Following discussion, other issues quickly emerged...

Some recall energy suppliers being fined for mis-selling in the past, signalling not that the market is being well regulated, but that there is poor practice in the sector

Awareness of small suppliers going 'bust'

Issues relating to smart meters, including pressure to have one installed, incompatibility and concerns about how the data is used

Some awareness of introduction of price cap

There's a prevalent belief that those on pre-payment meters cannot switch suppliers

Some concern that those on pre-payment meters or not online are charged more than other consumers

Numerous issues relating to the energy sector raised

These point to perceived inequities and market failings



Mixed levels of confidence in consumer protection at the start of the session

In individual questionnaires at the start of the workshops, we explored participants' starting attitudes towards current and future levels of protection in the energy market. Their responses show that:

- There was a fairly even split between those who felt confident that the current systems adequately protect consumers in general (18 agreed, 16 disagreed);
- They had lower confidence that current systems adequately protect vulnerable consumers (13 agreed, 22 disagreed) than consumers in general;
- Unsurprisingly, there were high levels of uncertainty about future protection (10 said they didn't know. Only 4-5 said they didn't know in answer to the previous questions).

Q1. To what extent do you agree or disagree with the following statements?

	Agree strongly	Agree	Disagree	Disagree strongly	Don't know	Total
I am confident that the current systems to protect consumers in the energy market are adequate	1	17	13	3	5	39
I am confident that the current systems to protect consumers in the energy market are adequate, even for the most vulnerable consumers	-	13	15	7	4	39
I am confident that the current systems to protect consumers in the energy market will be adequate for the next decade	1	8	14	6	10	39



There is an underlying distrust of energy suppliers and a number of issues commonly raised

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Prevalent perception that they are all 'as bad' as each other and all out to make money.

I don't trust anyone – they don't care (Cardiff)

Bills, tariffs and units are deliberately confusing

Bills are more complicated than they need to be, that's for sure. I think that there's a little man who thinks 'how can we confuse them?' (Coventry)

Suppliers keep consumers' accounts in much credit – charge higher bills and don't refund

I have a budget in terms of gas and electric that I use and it has to be turned off when I reach my budget. The bloke on the other end has no clue...they have no concept that you have to work out what you are going to spend (Coventry)

Doorstep mis-selling – examples of vulnerable consumers being targeted

For example...

A few participants mentioned experiences of them/ relatives being persuaded to switch when in vulnerable circumstances, and then experiencing higher bills.

Supplier ignoring meter readings

For example...

One participant was told by E.ON that they were not billed enough and that they owed £1k. She had been giving meter readings online but E.ON discounted them as they assumed that they were incorrect. She is now paying E.ON back and also paying Ovo for her current supply.



Trust: large vs small energy suppliers

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Larger companies were assumed to be more expensive than smaller ones, but also to have better customer service and more robust customer complaints processes

Some (often older) consumers feel that they should be loyal to their existing supplier

Smaller companies tended to be less trusted because of concern about them potentially failing and general distrust of unknown organisations, but there were some examples of positive experiences (relating to cheaper prices, refer a friend schemes and user-friendly apps)...

I trust the big brands that they are reputable and they wouldn't do anything underhand or rip you off on purpose, but I don't trust that they'd be the best value...they'll have a complaints department and people who look after this. (Cardiff)



Switching issues raised by switchers – or easily imagined by non switchers

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Some have had poor experiences which deter from switching in future and others are put off by possible problems. Some appear to accept that such issues are part of the process

Some evident concern about small suppliers failing and consumers are given no choice over the replacement

The issue is [small] companies... might go bust. Then you end up with someone you didn't choose. So I stay clear even though they [competitors] have better rates. (Stirling)

Switched to small supplier which went bust and then struggled to get credit back

For example...

One participant was with Snowdrop Energy after switching using a PCW, but they went bust and he was moved to another supplier. He's lost £400 in credit and then had a £2,800 bill come through, which he is struggling to pay. (Coventry)

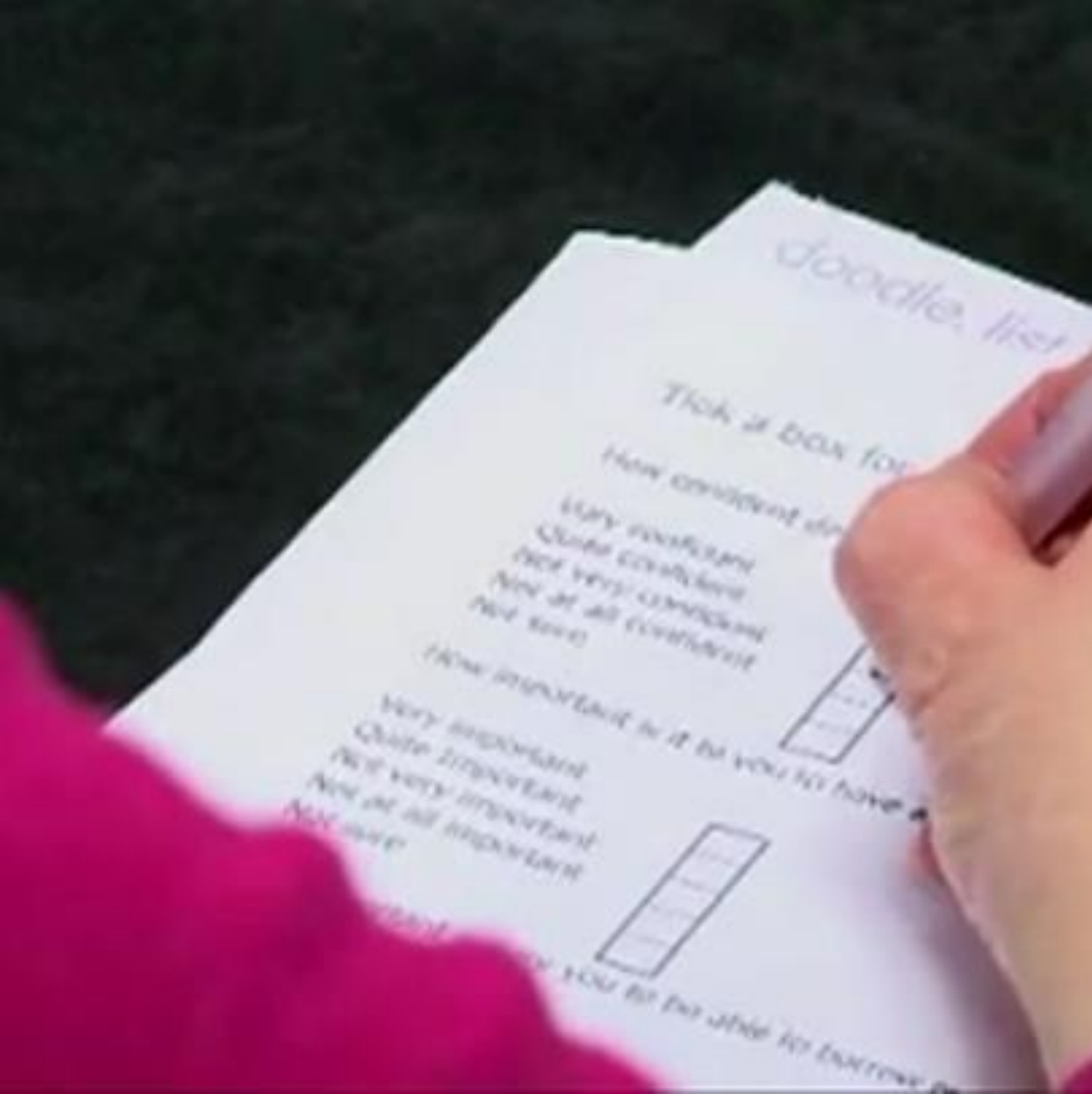
Switching savings diminish or don't materialise

They give you a good quote based on last year, but you soon realise within 6 months that you aren't paying enough and the bill gradually goes up (Cardiff)

Confusion about overlapping period when switching

Trying to work it out is mind-boggling and speaking to them on the phone is pointless (Coventry)





3. Context – people in vulnerable circumstances

Experiences and views of vulnerability and the energy market from interviewees

Interviews with people in vulnerable circumstances

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10 interviews:

- 2 x older men with long-term conditions and mobility issues;
- 2 x women with experience of poor mental health;
- 1 x pregnant mother;
- 1 x new mother;
- 2 x people for whom English was not a first language;
- 1 x Deaf woman who is a support worker for other Deaf people*;
- 1 x man with visual impairment who works with other people with visual impairments*.

*These interviewees spoke of their own lived experience, and that of people with sensory impairments they supported in their work.

Pen portraits of interviewees can be found in the appendices

Full spectrum of switching confidence and behaviours

Findings specific to vulnerability interviews have a purple background...



Most interviewees did not consider themselves 'vulnerable', despite fitting standard definitions of vulnerability

Lots of vulnerability
'risk factors'
amongst
interviewees

Many had **higher energy needs**

Due to illness, low mobility, needing assistive technology, spending more time at home (e.g. with a baby, reduced confidence to go out)

Most had **financial pressures**, including low incomes and debts

Some **less able to understand options and choose** the best deal for them

Information and channels not meeting communication needs

Some found it **hard to represent their own interests** when things go wrong



Interviewees readily identified times when they had been vulnerable, or people they knew who were vulnerable

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Lack of IT literacy or
online access

Hard to view market and
compare if not online; don't
get such good deals

**Lack of understanding of
energy**, how to compare, how
to use PCWs, how to complain

Interviewees
identify several
(often interlinked)
reasons why
people they know
are vulnerable in
this market

**Nervousness/ low
confidence** in making
choices

Some observed that people they know have
become more fearful as they got older.
Compounded by complexities of comparing
deals and potential consequences of getting
it wrong

Low financial literacy;
limited budgeting skills

Especially amongst
people experiencing
episodes of poor
mental health

Especially amongst people for whom English is
not their first language and 'vulnerable deaf'
people. Lack of English means a significant gap
in understanding of systems, ability to interact
with service providers and ability to manage
finances.



In their own words...

You can become fearful when you get old. That doesn't apply to me personally at the moment... but I've got an uncle who lives near here and he's 98 and he can sit here and he's completely savvy but he gets frightened, because he's on his own... I'm completely different to my uncle, he would worry. He'd be worried to death about [switching]. (Older man with disabilities)

We're very lucky, we're reasonably computer savvy for our age and so there isn't much we can't attempt to do on the computer. But there's an awful lot of people who haven't got a computer and then they've got no chance... we've got friends and they haven't got a clue, not a clue, so they stay with the same people. I say "Why are you doing that, why are you sticking with them?" and he'll ring round, he'll be on the phone for three hours ringing people getting quotes when you can do it in like five minutes on the computer.
(Older man with disabilities)

My fear is around messing with something that's alright at the moment... Why would I add stress into my already stressful life? (Woman living with anxiety)

How do people make contact with these companies? How are they going to do it? For myself, I can do it - I can go online, but vulnerable Deaf people can't do that - some can't read English. If you want to make a phone call, you have to get an interpreter out. (Deaf woman)



Many examples of people experiencing detriment in the energy market as a consequence of vulnerability

On a **more expensive deal** due to not switching

- Overwhelmed by idea of switching;
- Don't know/ believe value of switching;
- Believe can't switch because a tenant/on pre-payment meter/ have energy debt.

Pressure selling/ mis-selling

Example includes switching to more expensive deal following 'door-stepping' whilst vulnerable

Some had experience of harm/ detriment when vulnerable. Others knew vulnerable people experiencing detriment

Self-disconnection or rationing energy

Examples include: interview in cold house with new mother; Deaf support worker meeting clients at home to find them living without light because they didn't have money to top-up.

Ending up in **debt**

Don't understand bills or not able to deal with them

Putting up with problems

- Need help to sort it out, but don't know where to go or don't want to ask for help.
- Couldn't seek help because channels/ processes not accessible to them.



In their own words...

I've never changed supplier as I don't know how to do it. I would love to learn how to [switch] then I'd be in control... With these people I'm stuck as don't know if I'm going to go to a worse or better company (Woman for whom English is not her first language)

*Some Deaf people can't read. They might not be able to read their meters. Some of the Deaf people I've supported don't know how to read a meter... I've had to teach them how to do it - how it works - 'This is your gas meter, it's separate to your electric meter,' about Direct Debits, whether your bills come quarterly or monthly.
(Deaf woman)*

*I'm very concerned that a lot of the Deaf community get these bills, get these bits of paper, and put them on the side and don't really bother to read them to check what it's all about... They potentially end up in debt because they haven't understood what their bills are about.
(Deaf woman)*

If you live on your own and you're not computer literate, you're bugged basically, because the information you want, you're not going to get it in the form that you want it... Because the system and the company are inaccessible, and choose to be inaccessible... If you live on your own and you're computer literate and you can afford a mobile phone, you've probably got a chance of sorting it out. If you live with someone who is sighted, you're sorted because they'll do it for you. (Man with visual impairment)



In their own words...

Ultimately they are missing out on saving lots of money... and that's why it's a big thing - most people with visual impairments are pensioners or unemployed... And they're missing out on choice and control of your own life. You're missing out on being able to control and choose things in a way that a non-disabled person would.

(Man with visual impairment)

There are some [vulnerable Deaf people] who are on the key meter and they go, 'Oh the lights have gone out, I need to put some money on the key meter.' Sometimes I've done visits, and I'll say to them, 'why are you sitting in the dark?' or 'Why are you sitting in the cold?' and they'll go, 'Cos I haven't got enough money to put on the meter.' and I'll be sitting there wrapped in my coat, freezing, thinking, '...if they'd been on Direct Debit, it would have kept them warm, because at least it would have been paid.' ...It's very different to car insurance... gas and electric - if it's not paid, you could get cold. There's always an effect. (Deaf woman)



People in vulnerable circumstances rely on others they know to help them in the energy market

Some said they relied on help from friends/family or relied on voluntary and community sector organisations

Especially to sort out billing difficulties or other problems

Some more savvy switchers had helped more vulnerable relatives to switch

For example...

One older participant had helped his uncle to switch by using a PCW to find him the best deal and initiate the switch

A younger participant had helped her parents to switch by finding them a better deal online.

They recognised that some more vulnerable people might not have these support networks

Most of them won't [ask for help], and that's the big thing... They're embarrassed, I suppose, they don't want to ask for help, and old people get like that. (Older man with disabilities)





4. Views of Third Party Intermediaries (TPIs)

Spontaneous and prompted awareness and responses to TPIs amongst workshop participants

Introducing participants to TPIs...

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In workshops and interviews we gradually introduced participants to different types of TPIs and role they could play in the energy market...

Price comparison websites

Most participants were aware of price comparison websites, which act as 'go betweens' between consumers and suppliers

Auto-switchers

Some participants had heard of auto-switchers (such as Flipper and Look After My Bills), but none had used them

'Smart' TPIs and future possibilities

We introduced participants to possible future developments in the energy market, and how TPIs have a role to play in these.

We couldn't cover everything because of timings so prioritised different sorts of TPIs that would help participants understand and explore the issues.



Introducing participants to 'Smart' TPIs and future possibilities...

Some of the ideas we explored included...

Smart technology – smart meters and smart devices let people see how much energy they use, and switch off devices when they aren't at home. Consumers could let others (including energy companies and TPIs) switch appliances on or off to reduce their energy costs.

Bundling – allows consumers to bundle several services together to get a cheaper deal e.g. phone, broadband, TV. They might supply smarter technology as part of the contract. TPIs could do this 'bundling' – bringing together services from different suppliers, but managing it as one contract for you.

Time of use – there are some times of day when more people want energy. Energy companies might incentivise customers by making energy cheaper at times when demand is lower. Energy companies or TPIs could switch smart appliances on or off for customers so they get cheaper energy.



Range of factors influence underlying attitudes to TPIs and associated consumer protections

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Trust in the
market and
suppliers

Experience of
switching in
energy and
other
markets

Attitudes to
data sharing
– ranging
from relaxed
to highly
concerned

Importance
placed on being
in 'control' of
decisions

Personal
circumstances
affecting ability
and interest in
exploring new
options, such as
income, family,
health

Vulnerability –
some people will
find it harder to
understand?

Confidence,
competence and
willingness to
transact online

Some reported people they know who are not online, or are, but worry about 'getting it wrong'



Spontaneous views of Price Comparison Websites (PCWs)

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*Cheap
Energy Club
most
trusted by
far*

*He's [Martin Lewis]
like Yoda to my
husband (Coventry)*

High level of awareness –
ubiquitous advertising

Many used them for other sectors
(typically insurance) if not energy

Low level of awareness of their
operating model:

- Unsure if they display the whole of the market – some assume that they do but many know that Direct Line opts out
- Few have previously considered how they make money or potential biases in deals resulting from commission system

*Marketing
lends
legitimacy
and
warmth*



*I like the Meerkats!
(Stirling)*

But these (mostly Savvy Switchers) are happy with the operating model, because it still saves them money



Views of PCWs when asked to consider pros and cons for consumers

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Overall PCWs
seen as benign –
many struggle to
identify possible
consumer issues

Benefits

Possible cost savings

Saves consumers' time

Ease of use

Familiarity

Consumer retains control of
energy choices

Working 'for' consumer to get
the best deal

Risks

Inclusion of only some of the
suppliers on each site means
that consumer may not get the
best deal in the market

Lack of clarity about deal
details e.g. exit fees

May share/sell consumer data

*Frequent
switchers not as
concerned, as
they tend to
use more than
one site to get
best deal*

*But not a
widespread
concern*



Spontaneous views of Autoswitchers

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Some
underlying
suspicion

*I'd keep
away...it's all
smoke and
mirrors (Coventry)*

Some presume
for 'rich'
people or those
who like to
take a risk

*I assume that it's like
the stock exchange?
Maybe if you have lots
of money and can
afford the risk (Stirling)*

Relatively low level of
awareness – no high profile
advertising and little word of
mouth

Some have heard of Look After
My Bills (LAMB)

Small number of participants
had investigated, but none had
signed up as yet

Risks more immediately
apparent than benefits
(despite many identifying
barriers to switching, which
Autoswitchers could help
overcome)

'Halo'
effect of
Dragons'
Den for
LAMB

Risk perceived to
increase if billing
relationship is
with Autoswitcher



Views of Autoswitchers when asked to consider pros and cons for consumers

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Benefits

Saves consumer time and effort

“Headache free”

Possible cost savings

Seen as potentially appropriate for less engaged/ more vulnerable consumers

Some assume they would take the side of the consumer in a dispute with suppliers

If you did have a dispute and it occurred with Flipper / iChoosr would they act on your behalf to intervene? I'd expect that to be part of the service if they are an agent. That would be an asset. (Stirling)

Risks

Preferential relationships with certain suppliers may mean that consumers may not get the best deal in the market

Lack of clarity about the deal details e.g. exit fees

May share/sell consumer data

Lack of control/supplier choice

Lack of accountability, if problems arise

You'd have to trust the TPIs very much. Would want to know where they get their commission. Why pay someone when you can do it yourself? If they get a discount so we pay less and they get cream then we all win. But that's not explained. (Stirling)



Spontaneous views of Smart Energy TPIs

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Concern
about who
it is 'smart'
for

Will the suppliers use the systems and additional information gathered to find out when consumers are using more energy and put the prices up at those times?

New information to most
Immediate concerns about
loss of control
Some concerns about level of
data sharing

Initial resistance to the
concept because of the
perceived impact (and
restrictions) on day to day
activities and associations
with 'Big Brother'

Negative
emotional
response
from many

*Gives me the
creeps! (Stirling)*



Views of Smart Energy TPIs when asked to consider pros and cons for consumers

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Benefits

Cost savings

Smarter use of energy – more environmentally friendly

Less for consumers to think about (some also think that could help educate consumers)

State of the art/forward thinking

But environmental benefits not to the fore within discussions

Risks

Significant concerns relation to data misuse – intentional and accidental

Lack of transparency resulting from complexity e.g. fear of being locked into a contract

Lack of accessibility for vulnerable groups

Difficulty seeking redress because of lack of clear accountability

Concern levels exacerbated by alien concept

Assuming access will be online, and because of complexity/novelty





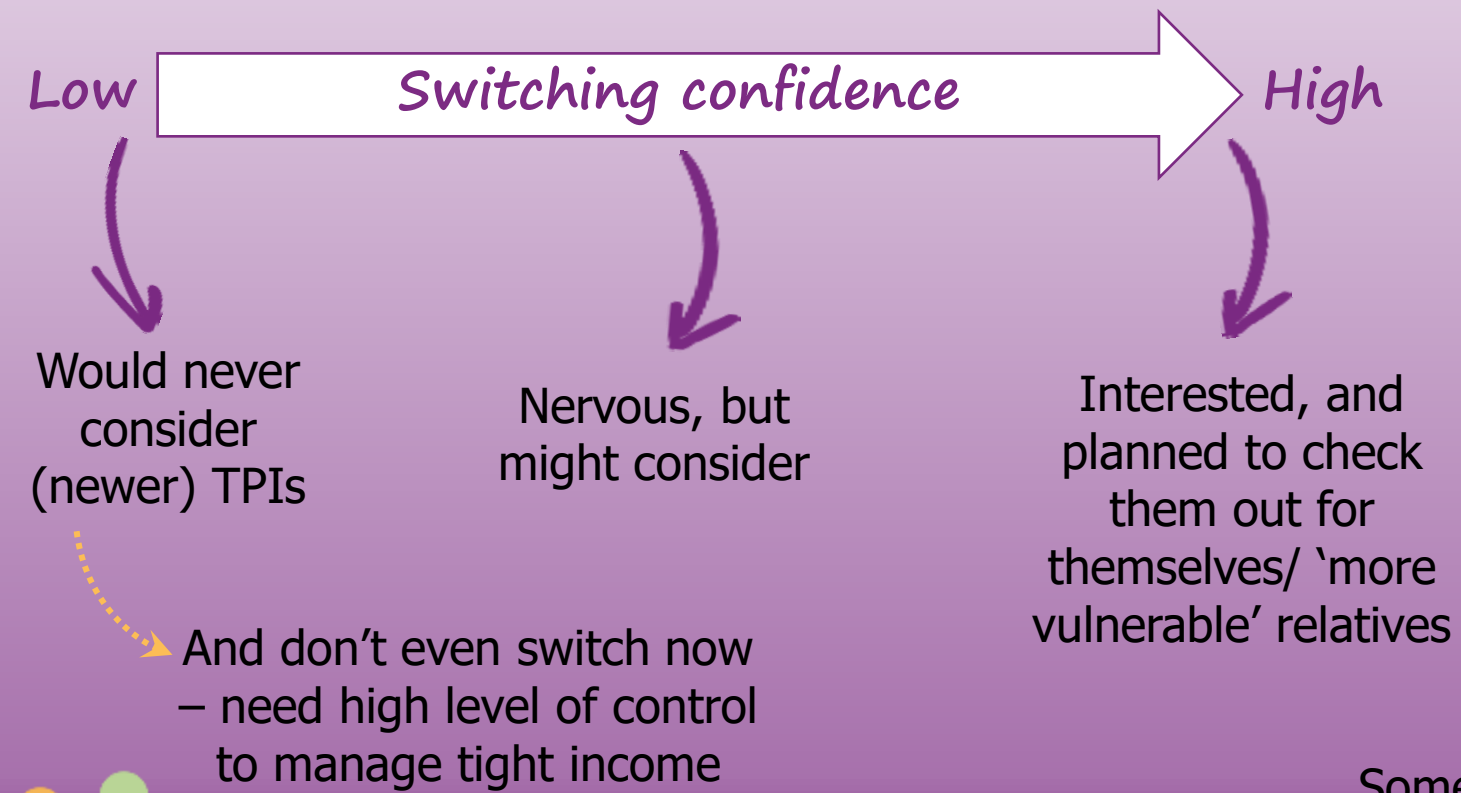
4. Views of TPIs – from people in vulnerable circumstances

Spontaneous and prompted
awareness and responses to
TPIs amongst interviewees

Newer TPIs have potential to bring particular benefits for people in vulnerable situations

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Variation in response to newer TPIs, primarily linked to confidence in switching



TPIs felt to have potential to offer real benefits to people they know who lack confidence, capacity, or inclination to compare market and get best deal...



In their own words...

I want to be in control. I don't want anybody to control me.

(Woman for whom English is not a first language)

I don't trust people. They could be paid by whatever supplier to switch me to them. Or they could switch me to a supplier where the customer service is worse and I wouldn't be able to get out of that contract for a certain amount of time. (Woman for whom English is not a first language)

If you sign away your option to make decisions you are giving a lot away... I'd be the one who had their bank details stolen, or would switch and end up paying direct debits to the old and new supplier (Woman living with mental ill-health and physical disability)

I suppose, for me setting up my parents [with an auto-switcher], if it just found them the deal it's brilliant because it's one less job for me to do, set them up once and then it's all done for them. Or my nan, setting up my nan, it's just done and I know then she's not getting conned.

(Pregnant mother)

It might suit some people who have mental health issues... there might be some people who feel overwhelmed by it all... If they could just go, 'Right, that company - you deal with it.' That would be easier for them. (Deaf woman)

I think it's great, honestly... the ones you just said, Look After My Bills, Flipper, that's what my uncle should be doing. I might even think about doing it as well because it would save me all that hassle.

(Older man with disabilities)



But barriers and risks associated with newer TPIs are amplified for people in vulnerable situations

Barriers

Barriers similar, though intensified:

- Trust, especially in new companies/ products
- Low engagement
- Less control/ flexibility
- Financial risk

Some extra barriers for some vulnerable audiences:

- Accessibility of information and process, especially if online and in English

Risks

Risk of harm greater for people in vulnerable situations if something goes wrong, e.g.:









- Double charging in switch process – particularly problematic if on low income
- Loss of supply highly problematic if relying on assistive tech or health equipment
- Loss/ misuse of highly sensitive data, especially if about income and health



5. Views of consumer protection

Spontaneous and prompted views of current consumer protection in the energy market amongst workshop participants.

Introducing participants to consumer protection in the energy market...

Type of consumer protection	Energy suppliers	Price comparison websites	Newer TPIs, including autoswitchers
			
	<p>All companies must follow consumer law and treat consumers fairly. You can take a company to court if you think it has broken the law.</p> <p>Citizens Advice has a responsibility to help consumers with any energy issues</p>		
	<p>Energy ombudsman will deal with complaints with energy companies that aren't sorted within 8 weeks</p>		
	<p>Suppliers must be licensed with Ofgem. Ofgem sets standards. They can revoke licences if suppliers break the rules.</p>		

In workshops and interviews we asked participants what they knew about consumer protection in the energy market. We then used presentations and handouts to explain the mechanisms of consumer protection for different types of companies (suppliers, PCWs, newer TPIs).

Handout used in interviews to talk participants through existing consumer protection mechanisms



Regulation and consumer advocacy in the energy market is not understood

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Making a positive difference
for energy consumers

Terms used interchangeably with most having a poor understanding of roles and remits

No awareness of Ofgem's Confidence Code

Ombudsman Services

Are Ofgem part of the Ombudsman? Ofcom...Ofgem...I don't know the difference (Cardiff)

I thought that they [the Ombudsman] were like Ofsted for schools...they go in and inspect (Coventry)

Positive initial response to brand but no awareness of energy advocacy role – tends to be associated with advice and information (typically financial) rather than advocacy

Some negativity about access at all sessions – offices closing, short opening hours, difficulty getting appointments

citizens advice



Little appetite (or ability) to escalate issues

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All would contact the supplier about a problem in the first instance

A few said they would threaten with Ofgem/ Ombudsman

Possibly, name and shame on social media

If unsuccessful, tend to give up at this stage or vote with their feet (i.e. switch)

No reported escalation of energy issues in spite of some anecdotes involving hundreds of pounds

Often attribute issues to their own error or inability to research properly and switch suppliers rather than pursuing issue

Almost no participants felt they would try the legal route of asserting consumer rights. It was seen as costly, complicated and time-consuming

I probably wouldn't take it further, I don't have a lot of drive or a lot of time...I'd probably just sit and wait. (Cardiff)

If you talk to your [elderly] neighbour, they would probably give up very early on...'I don't know what to do so I won't do anything' (Coventry)



Barriers to using Alternative Dispute Resolution (ADR) are identified quickly

Significant barriers associated with using an Ombudsman amongst those with no experience

- Bureaucratic, formal process
- A lot of effort
- Only for serious issues – seen as a big step

Concerns when learn of the need to wait for 2 months before escalating

Particularly in relation to refund issues, especially for those on tight incomes

A small number of participants had used Resolver previously (relating to retail problems) but the majority were not aware of this service.

One had used ADR – CICAS – for an issue with the internet

A few had used – or threatened to use – an Ombudsman (in financial, retail and legal services).



Energy sector is perceived to be 'special' and require special attention in relation to protections

Significant
consequences
if loss of
service

You need energy. You don't need a phone. Imagine if you had no heating in this weather? (Stirling)

Complexity/
unfamiliarity
resulting in
low confidence
in decisions

When you're talking about kilowatts and that, how can you work that out? I don't know. When you compare it to [choosing] a phone [contract]... it's difficult to [relate to].
(Cardiff)

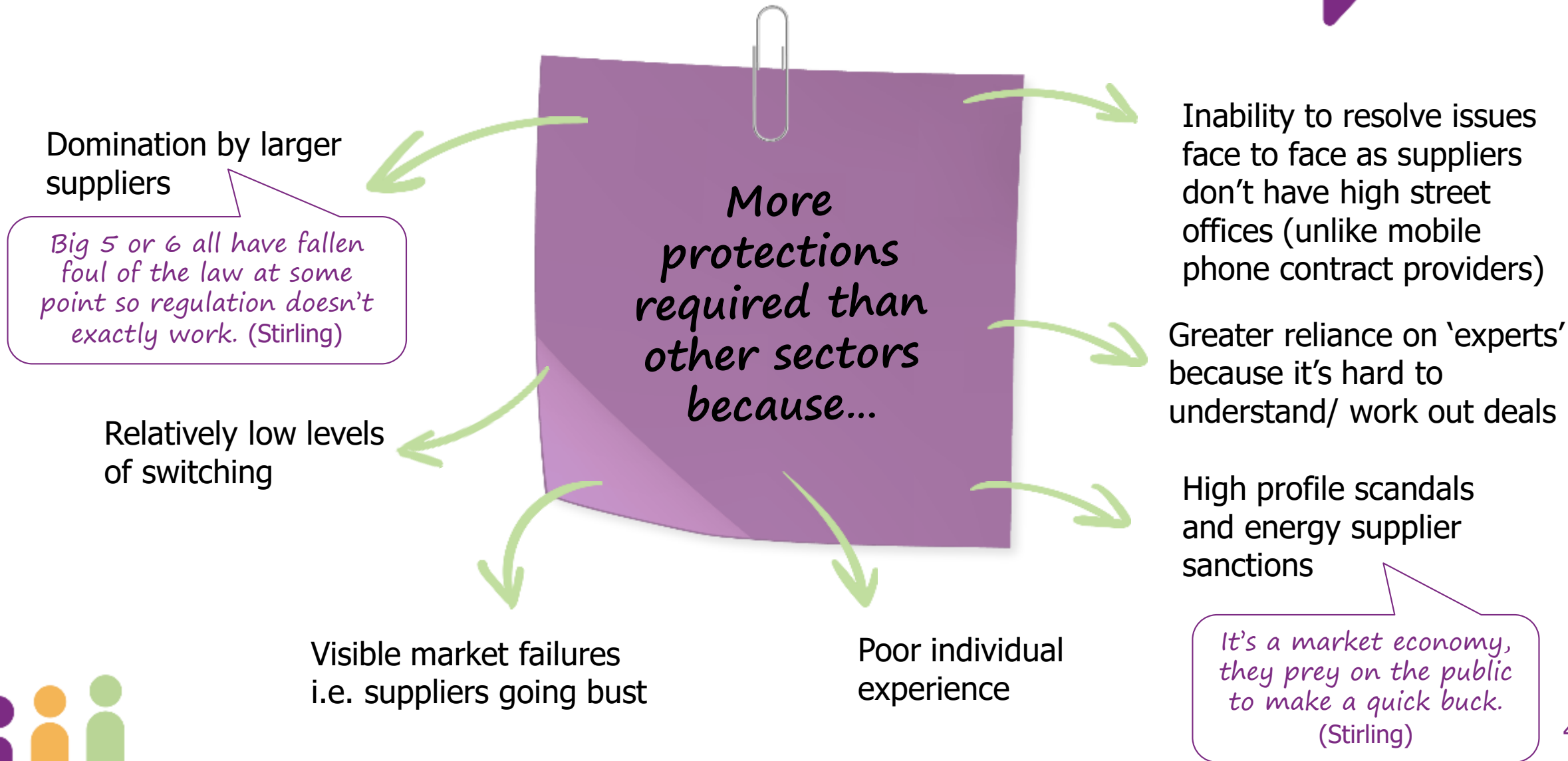
Energy costs
are high – a
significant
proportion
of income

I do think it's important that [TPIs] behave to a higher standard in energy than perhaps they do in insurance or housing... so I think the gap [in regulation] with third party intermediaries is actually more shocking... when you think of the money that's involved and the essential nature of the commodity. (Cardiff)



Compounded by concern about how the sector is felt to be operating at the moment...

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Concern about current system of consumer protection for TPIs once informed

Once the current system of regulation for TPIs was explained, there was a consensus that consumer protection needs to be reviewed and strengthened.

I think there is too much scope for these TPIs at the moment to pull the wool over your eyes, so there does seem to be a gap in regulation. (Cardiff)

It's subprime mortgage scenario. (Stirling)

Several participants liken the current system to financial sector before crash

If new kids are offering something new and will deal directly with big boys that's interesting but what will they do differently if not regulated? (Stirling)

It's such a sensitive thing, companies are dealing with so much money and it's something that is universally used...you would think that they would go with the safest plan. (Cardiff)

Could it blow up at some point? (Cardiff)



Overall confidence in consumer protection falls over the course of the discussions

At the end of the workshops, we asked individual participants the same questions we had in questionnaires at the start of workshops to see how their views had changed. Their responses show that:

- Fewer participants were confident that the current consumer protection systems are adequate at the end of the workshop (23 disagreed) than at the start of the workshop (16 disagreed).
- Confidence in the protection of vulnerable consumers remains lower than all consumers (26 disagreed, compared with 23 disagreeing that protection was adequate for consumers in general).
- Fewer participants were confident by the end of the workshop that current systems will be adequate for the next 10 years (20 disagreed at the start of workshops; 25 disagreed by the end).

Q1. To what extent do you agree or disagree with the following statements?

		Agree strongly	Agree	Disagree	Disagree strongly	Don't know
I am confident that the current systems to protect consumers in the energy market are adequate	Views at start...	1	17	13	3	5
	Views at end...	0	15	20	3	1
I am confident that the current systems to protect consumers in the energy market are adequate, even for the most vulnerable consumers	Views at start...	-	13	15	7	4
	Views at end...	1	10	21	5	2
I am confident that the current systems to protect consumers in the energy market will be adequate for the next decade	Views at start...	1	8	14	6	10
	Views at end...	1	5	16	9	8



Top of mind concern about consumers in vulnerable circumstances evident throughout discussions

Consumers in vulnerable circumstances identified spontaneously at the start of the session and referenced throughout as needing additional support and protection

Consumers who are not online who may be disadvantaged

Students/young people who are unused to the market

People who have low incomes and no savings

Some concerns about how vulnerable people would be identified by energy sector players and the point was also made that, in this market, all consumers struggle to understand

Those for whom English is a second language

Those with learning difficulties

Those with mental health issues

With this [energy], it's not just vulnerable people who are at risk, it's everybody... not many people know how it works. (Cardiff)

May have particular issues understanding the market or communicating with their supplier



PCWs should be regulated but at a lower level than other TPIs

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We briefed participants on the different types of TPI and existing consumer protections. We then invited discussion on the risks and benefits to consumers for each type of TPI, and asked them what level of consumer protection was appropriate for each.

Initially participants were not aware of Ofcom's Confidence Code. Once they found out about it (and that it is voluntary), participants thought it should be mandatory for PCWs.

Overall, however, they were happy with a lower level of regulation than for other types of TPI to reflect their less invasive role and given that consumers' primary relationship is with supplier.

There is an assumption that there is lower exposure to harm when using PCW

There is an expectation on consumers to do their homework and make informed decisions, hence 'comparing the comparison sites'.

Your dealings with them are for a limited time, and you have limited exposure to danger, because they're not going to cause a disruption in your supply or make your appliances unsafe or whatever... Their dealings with you are limited to finding the price, and then you never remember them again because you're actually dealing with the [energy] company, aren't you? (Cardiff)



General preference for graduated or activities based system of regulation

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We introduced participants to different models of regulation, including graduated and activities-based systems and invited views on what they wanted to see in the energy market.

PCWs

Confidence Code should be mandatory

Auto switchers

Newer, not tried and tested so need more oversight than PCWs. Sharing more data and more control over decisions.

Other TPIs

Futuristic, with greater control and involvement in day to day life, so require stringent regulation. Complexity means greater potential for things to go wrong

Rising levels of scrutiny required

The first level is when you just say that we'll look around find a better your deal for you. Then there's the next level of saying we'll actually switch automatically, and then there's the next level of we're putting stuff in your house to monitor and switch things on and off. (Cardiff)

We need an extra level of care for those who switch people on their behalf...so an enhanced level of care (Cardiff)



Consumers do not care about the mechanics – just as long as it is obvious and easy for them to navigate

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One organisation overseeing the whole market because of the need for expertise and an overview

It would be reassuring if they were regulated by the same company even if it was different rules and regulations because they all operate differently. Especially as it's a bit of unknown because they are such new companies.
(Cardiff)

Clear route of redress and escalation – Ombudsman or equivalent for all TPIs

If, for example, a price comparison website sends you down a line and you end up in financial bother with it... and nobody wants to know, they do need some form of ombudsman. Similarly, with [newer TPIs], they need all of this really. (Bristol)

The regulator needs expertise in specific areas, for example data

It [data] would be my biggest concern. If I didn't think it was a good deal, I can make a decision what to do but once I've given them my personal details and all my data, I don't know what they are going to do with it. (Cardiff)

Must have teeth (unlike current system)

None of the protections have any teeth. Never heard of these people coming down on energy or broadband company. Talk a good job but doesn't come to anything.
(Stirling)



Developing high level principles of regulation in the future energy market

Our final exercise in workshops was for participants to work together to develop high-level principles for TPIs to work to. We provided them with examples of existing codes...

Competition Markets Authority principles for digital comparison tools

Principle	Example behaviour
Clear	Explain their services and how they make money
Accurate	Provide information that is complete, correct, relevant, up to date and not misleading
Responsible	Protect people's details and be easy to deal with
Easy to use	Make information easy to find and understand

Consumer Futures Unit principles

Principle	Description
Access	Can people get the services and goods that they want?
Choice	Is there any?
Safety	Are the goods or services dangerous to health or welfare?
Information	Is it available, accurate and useful?
Fairness	Are some or all consumers unfairly discriminated against?
Representation	Do consumers have a say in how goods or services are provided?
Redress	If things go wrong, is there a system for putting things right?

Ofgem Confidence Code

Principle	Example behaviour
A. Honesty	You should identify yourself, the services being offered and any organisations you represent (directly and indirectly) clearly at the start of any interaction with a customer and obtain their consent before any marketing
B. Respect	You must at all times respect the consumer's wishes and should cease the current contact and avoid future contact if the customer requests
C. Accuracy	You should make the customer aware of how much of the market you searched to obtain the offers you propose to them and ensure all offers are accurately presented
D. Transparency	Before obtaining their agreement to the contract, you should make the customer aware of all principal terms of the energy contract, including the services you provide and how the customer will pay (directly or indirectly) for those services.
E. Consumer focussed	You should record and investigate all complaints fully and act quickly to put things right when you make a mistake
F. Professional	You should ensure staff are adequately trained for dealing with customers and adhere to these principles

... then we invited them to develop their own...



Participants' suggested principles for TPI adherence

- Represents consumers' interests; not the suppliers'
- Fund the difference guarantees if price savings not achieved
- Good customer service
- Listen to customer feedback
- Ensure all customers are treated fairly and equally

Customer focus

*Ease of use/
clarity*

- Clearly explain all published results
- Keep it simple
- Clearly explain bills

Accuracy

Transparency

- Clear information about market coverage
- Information about how they are funded/ relationships with any specific companies
- Clear routes for complaint and redress

Up to date information about the length of contract, tariffs, exit fees and other costs
Provide the advertised energy type (e.g. green)

Safety

Responsibility

- Support for vulnerable groups
- Focus on the environment/sustainability
- Treat staff well

High levels of data protection, particularly relating to sharing, storage and destruction of personal data





5. Views of consumer protection amongst people in vulnerable circumstances

Spontaneous and prompted views of current consumer protection in the energy market amongst interviewees.

'More vulnerable' have low awareness of consumer protection, but higher need of advocacy and support

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*Low awareness
and experience
of existing
consumer
protection*

Understanding:

Some have lower level of knowledge on their rights, how to complain

Information:

Information in 'long' English inaccessible to some Deaf people and some people for whom English is not their first language

*'More
vulnerable'
consumers face
barriers to
accessing
advocacy and
redress*

Reliance on others:

Don't like to ask or won't bother for smaller issues

Channels/ process:

Online, phone, written processes not accessible for some people with visual impairments, some older people, some people for whom English is not their first language

Too much effort, too little guarantee of success:

Processes perceived as difficult and some lack confidence they have a claim



In their own words...

Most people I know would be scared shitless of taking someone to court. And because of no legal aid, they couldn't afford it anyway. Taking someone to court is the prerogative and power of the middle class, basically - people who can afford to do it and understand the system and how it operates. (Man with visual impairment)

It would be difficult [going to an ombudsman] - getting your money back from anyone isn't easy. Do you just ring them or do you have to fill in 20 forms? (New mother)

I don't think it would generally occur to me to [contact an ombudsman]. I think for most old and disabled people, they probably wouldn't... on the whole I would think the process is probably just a bit long-winded and too bureaucratic. (Man with visual impairment)



'Inadequate' consumer protection in developing energy market risks leaving people in vulnerable situations behind

When prompted, interviewees felt consumer protection is inadequate, especially for TPIs that have a higher level of involvement and control over energy and data

No awareness of Citizens Advice's role in the market, or of its PCW, but this is welcome

Risk of more vulnerable people getting left further behind, especially with shift to online and smart technology

Although they knew about local branches that might be able to help (albeit mixed experiences with local branches – some had long wait times and limited success).



In their own words...

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The autoswitchers, if they're going to undertake that sort of responsibility then they are going to be covered, I would have thought, in law, that they need to provide a minimum level of service. What they're doing is more likely there's something going wrong than there is with like the energy suppliers. All the energy supplier is doing is supplying you with energy, these people they're doing lots of different things. So the more involvement there is then the more things there is to go wrong. So you would really need to have some sort of power in force to control that. (Older man with disability)

This automatic switching, I'm very suspicious of it, and now [having heard about consumer protection], I'm even more suspicious, because I feel you have no control - they're controlling you. What if there's a problem? No - there's not enough protection. (Deaf Woman)

If the system doesn't care, it ain't gonna work. So if these providers don't recognise that people have different needs and that they may have needs that require a little more effort and a little more support - if they get that, then it would be good, because any system that enables an older person of 86 to save more money, because they are probably on a poor income, and enables them to do that easily, if that works, that's good. My worry is it won't. (Man with visual impairment)

[The current system of consumer protection is] good but it's inadequate, I think. It's inadequate because I think they've hit the suppliers correctly but the price comparison ones and these [autoswitchers], I know they're a new thing coming out, but they look to me to be completely freelance, if you like... , but I think there needs to be a bit more control over them really. (Older man with disability)



An effective 'safety net' of consumer protection is vital to avoid greater risk of harm when people are vulnerable

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Most interviewees thought extending regulatory oversight to TPIs offers a safety net for consumers who are more vulnerable

However, some people need extra support and different approaches so they can benefit in the changing market...



In their own words...

*It's probably only Ofgem who are going to make them. They must be given the power to say to these [companies], you have no choice but to ensure that your service is accessible to everyone who's going to use them. That means (1) If they require information in a different format, you give it to them. (2) You make sure that you train all your customer care advisors, you make them aware of people with different needs, and you make them aware of the different support that those people can receive... and (3) Where you can, you make concessions for them in terms of pricing and income, because most Disabled people won't have the income to afford the systems that you have.
(Man with visual impairment)*

Communication is the important thing, websites with... BSL videos, Deaf people's access to information, information in BSL about complaints procedures and about Ofgem and what they do. (Deaf woman)





6. Communicating protection

Workshop participants' responses to different ways of communicating consumer protection, including kitemarks.

Kitemarks nice to have but not essential

- Few look for a kitemark when choosing a service or product. Some awareness of BSI, Red Tractor and Fairtrade.
- Other factors, like word of mouth, are more important and what the quality mark means is not well understood.
- Differentiate between those that make a practical difference (e.g. ABTA) and those that are more for marketing
- Some indicate that a kitemark gives an extra layer of reassurance, particularly for newer companies, but impact in practice is questionable.

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Some concern that kitemarks could be faked or are not subject to strict verification and so are meaningless

It's probably more important for new emerging companies to have a symbol like that...for like the pension one you might not recognise but you'd probably trust someone like Prudential anyway whether or not they have that logo but for someone like 'We flip your bills', you might not (Cardiff)

We're all aware of ABTA but we're all involved in gas and electric but we don't all go on holiday. (Coventry)



No awareness of Ofgem's Confidence Code



The only kitemark that majority participants indicated made a difference to purchasing behaviour – possibly down to high profile travel company failures; travel company promotion of the mark and the fact it offers a tangible benefit





7. Citizens Advice's role

Response to the Citizens Advice brand and its Price Comparison Website.

Citizens Advice role in advising/information giving but not decision making for most consumers

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citizens advice

Extremely positive response to brand – perceived neutrality & independence

Evident concern about any possible activities that could damage this reputation

No awareness of CA's PCW but very positive response once shown

Showing the Whole of the Market very well received and the fact you can't click through to sites reinforces neutrality

It sounds really good. I'd trust it straightaway. You know the number of complaints. They are not in companies' pockets.
(Cardiff)

Presume Citizens Advice won't want to be degraded by offering information that makes it potentially liable. So it won't want to lose its "pedestal" status.
(Stirling)

No appetite for Citizens Advice to go further and offer an autoswitching service generally but some suggest this could be considered for vulnerable consumers

The existence of the site was one of the main messages participants took away from the sessions: many planned to go and use the site to compare deals.



In the words of people in vulnerable circumstances...

From my point of view, it would be nice if the Citizens Advice Bureau stepped up a bit. I didn't know anything about they've got some sort of responsibility for energy. I didn't know that, I didn't know they had a comparison website. Now, I would always use that in the future and have a look anyway, because I don't use it, I didn't even know it existed. (Older man with disability)

I would go and look at [the Citizens Advice PCW] because, again, I would trust that because it's Citizens Advice. And they wouldn't get any commission, would they? They wouldn't be allowed to, I'd imagine. (Pregnant mother)

For the older generation, it would have to be people going out from trusted organisations or charities like Age Concern or someone, that could go out and talk to older people about it... [and] the charities that work with vulnerable people anyway. It's not just the elderly, it's vulnerable people, they could help them with things like that to make it easier... You'd want one phone number and a 24 hour phone number, not just an online chat... Just having one number they can call anytime to get help and speak to a person. (Pregnant mother)





8. Conclusions

Conclusions...

- Consumers have little trust that players in the energy sector will act in their interests, underpinned by fact that energy is complex and deals are hard to understand.
- There is low awareness of newer types of TPIs and how they operate.
- There is low awareness and understanding of the current system of consumer protection and regulation in the energy market (including TPIs and PCWs).
- Consumers don't engage with the mechanisms of regulation and control.
- Instead, they expect a base level of standards for all organisations, but are less interested in who regulates the industry or how.
- They want to know who to contact to sort out issues and get redress, so expect this information to be obvious and accessible.

Consumers want to see greater regulatory control for all TPIs, increasing in stringency as TPIs increase their level of control over decision-making and data.



Conclusions...

- Consumers in vulnerable circumstances face additional risks and barriers in this market.
- They need specific protections and measures to help them engage with the market, make decisions, and represent their interests when things go wrong:
 - Accessible information (including: how the energy market operates, how their bills work, how they can switch, how to follow up when they need help)
 - Accessible channels to communicate with suppliers, TPIs and ADRs
 - Impartial third parties who can help them to understand the market and choose the best deal for them

Possible opportunity for an auto-switching service for those less likely/ able to engage with the market to ensure they get the best deals with minimal involvement/ effort for them.

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Room for Citizens Advice to promote its role and its PCW.

Citizens Advice also well-placed to act as a third party to support people in vulnerable circumstances to engage with the market, choose the best deal and represent their own interests (or work with other trusted intermediaries to achieve this).





Appendix:
Participant profiles

Appendix: Workshop participant profile

	<i>Characteristic</i>	<i>Numbers of participants</i>
Age	18-34	12
	35-64	19
	65+	8
Gender	Male	19
	Female	20
Ethnicity/ Nationality	White British	31
	BAME	9
Socio-economic group	ABC1	20
	C2DE (no. in fuel poverty)	19 (6)
With a disability/long term condition	Without disability	35
	With disability	4
Switching behaviour	Switched supplier in last year	10
	Switched supplier, but not in last year	19
	Never switched supplier	10
Location	England	19
	Wales	10
	Scotland	10



Appendix: Depth interview participant profile

<i>Characteristic</i>		<i>Numbers of participants</i>
Age	18-34	2
	35-64	6
	65+	2
Gender	Male	4
	Female	6
Ethnicity/ Nationality	White British	8
	BAME	2
Socio-economic group	ABC1	1
	C2DE	7
Switching behaviour	Switched supplier in last year	3
	Switched supplier, but not in last year	4
	Never switched supplier	3
Location	London	3
	Bristol	3
	Manchester	2
	Gloucester	2

Interviews conducted with individuals who:

- Are elderly/disabled (2)
- Have sensory impairments (2)
- Have English as a 2nd language (2)
- Are pregnant (1)
- Have children aged under 5 (1)
- Have mental health issues (2)






Appendix:

Pen portraits from
interviews

Who we met – confident, IT literate, savvy switchers living with disabilities in their later years



Eric is 78 and lives alone since his wife died four years ago. She was ill for the last few years of her life, and he nursed her at home. He has macular degeneration, which means he has lost his central vision, and has recently been diagnosed with Parkinson's disease.


He is not aware of his energy supplier's PSR, though he recently found out from a local support group that he can request large print bills.

Eric is a confident switcher. He knows exactly what he is looking for, and how to compare the different tariffs. He uses a PCW to choose a top three, then calls suppliers to negotiate the deal he wants.

Tony is 73 and lives with his wife Judith. He retired from heavy industry 20 years ago following an industrial accident which left him disabled. His mobility is limited, and more so in the winter with the cold and damp.

Tony says that they have to be careful with the pennies, and has a sophisticated money management system to make the most of what they have each month.

His grandchildren taught him how to use the internet, and he is confident in researching deals. He makes sure he switches his energy contract every year to get the best deal.



Who we met – People for whom English is not their first language

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Sadiq is in his late 50s and lives in a council flat. He speaks English fluently but finds written communication difficult.

He has a pre-payment meter and a poor credit record. He likes to stay with the same company as he believes they will see him as a loyal customer and reward that loyalty if he gets into financial difficulty.

He thinks asking a company for a better deal wouldn't work (it sounds desperate). Instead he waits for competitors to offer him a better deal, but as he was recently scammed he is now reluctant to answer cold calls.

Jamila is a single mum in her 50s with two grown up children (one still lives at home with severe mental health issues). She speaks English fluently but Arabic is her first language and she is not confident writing in English. She gets support from different organisations but doesn't like to over-use this support.



She is confident switching in other markets but finds energy uniquely confusing as she doesn't know how to predict her energy use to find the best deal. She is also worried if she switched she might lose her warm home discount, and that prices could go up after she switched.



* Names have been changed and stock photos have been used to protect identities.

Who we met – People with experience of poor mental health



Farah is in her late 30s and lives in council accommodation with her 5 year old daughter. A couple of years ago she had severe problems with anxiety which led to her being hospitalised for 7 months. She is now coping better with her anxiety, but it makes change difficult for her.

During her crisis she got into significant debt as she wasn't able to deal with her bills. She is still having to manage these debts now, and likes to have close control over her outgoings, so doesn't like direct debits. She has never switched energy suppliers, and feels she can afford her current energy costs. She worries that things could go wrong with switching, or that it would be a hassle, so she hasn't looked into it.

Mary is in her late 50s. After an accident she has had problems with her mental health (anxiety and epilepsy) so her daughter or brother help her with all her decisions about utilities.


She switched energy supplier once but did not get the savings she was promised and instead had to pay significantly more. Eventually, some of this money was returned but she now is anxious about changing provider again.

Instead she rings her provider annually, armed with information provided by her brother on the best available tariffs and negotiates with his help.



Who we met – people with sensory impairments

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Helen is in her 50s. She is Deaf and uses British Sign Language to communicate. She works as a Deaf support worker.


She is confident in navigating systems, unlike many of the Deaf people she supports. They often struggle with navigating systems that non-Deaf people take for granted. Much of this is down to information being in English, which is not their first language, making it inaccessible to them.

Helen has switched suppliers in the past, and is confident she could shop around for a deal to suit her if she felt bills were getting too high. In contrast, some of the people she supports lack even the most basic understanding of how energy works or how to switch.

Geoff is in his late 50s and was registered blind aged 14. He is totally blind, which he says is fairly rare amongst people with visual impairments, most of whom have some vision or can detect light.

He currently works for a charity helping other people with visual impairments to have a voice.

Geoff himself is not an active switcher, though his partner is, and has got him onto a different deal. He says that most people with visual impairments are older and on limited incomes, and that they are likely to have low confidence and/or capability to switch, especially as easy switching relies on being online and IT literate.



* Names have been changed and stock photos have been used to protect identities.

Who we met – women who are pregnant/ have young children

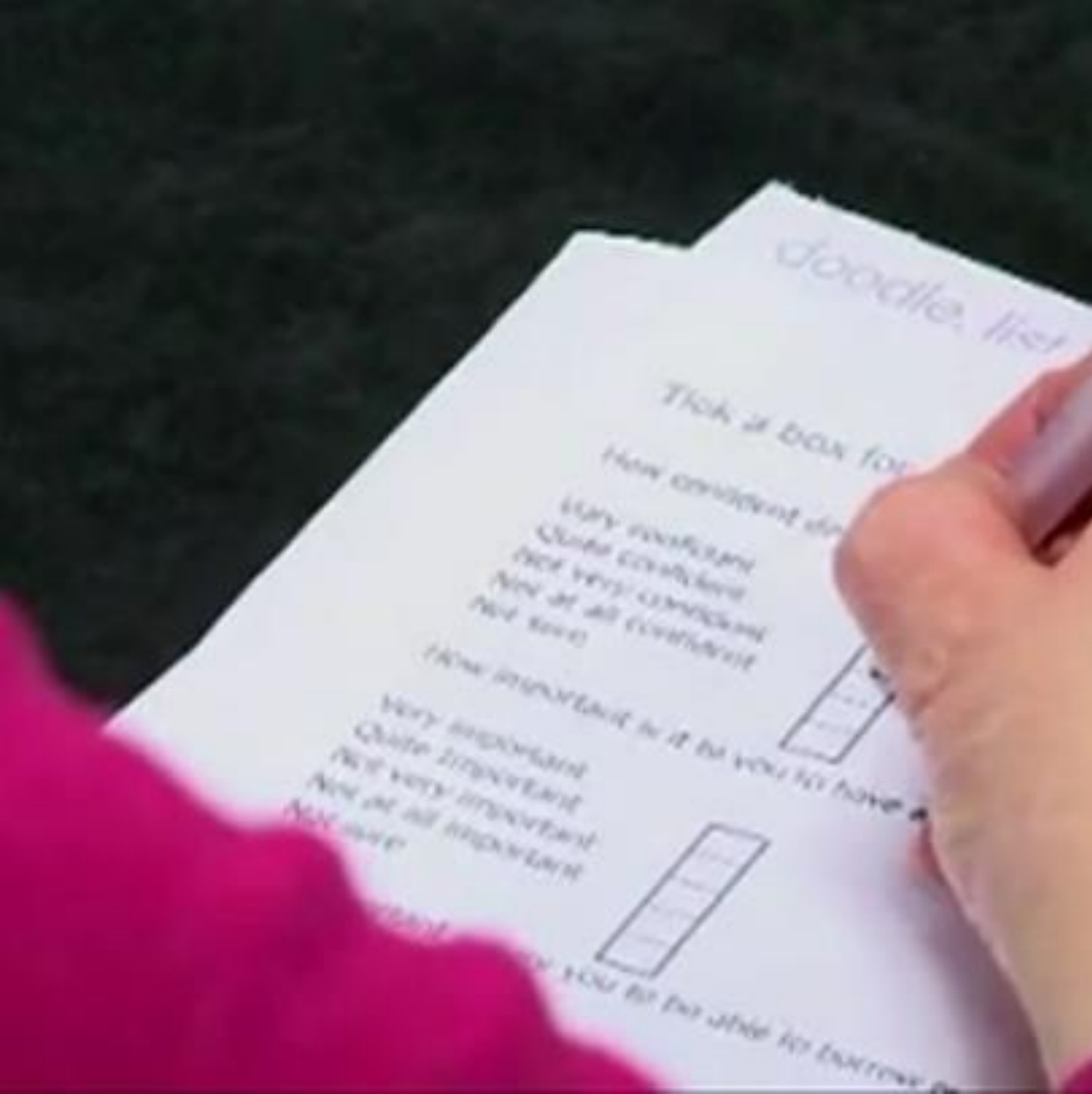
Jenny is 21 and recently moved out of her parents' home into a private rented flat with her boyfriend and baby. She has found the process overwhelming and this has been compounded by problems with her landlord and the flat.

She is interested in switching supplier, but has been unable to so far because her flat did not have a separate meter. When she does, she will use a price comparison website chosen based on word of mouth and might consider an auto-switcher her friend recommended as she knows shopping around takes time and would like to be confident she is getting the best deal.

Charlotte is in her 30s and is expecting her third child. She has recently moved into a new house with a smart meter and smart thermostats. This means they can control the heating in different parts of the house remotely via an app.

She is a confident switcher across all markets, and always on the look out for a better deal. She likes to be in control of how much she's paying, and monitors it closely. It frustrates her that her parents and in-laws don't switch (due to lack of confidence) – she knows they are paying too much.

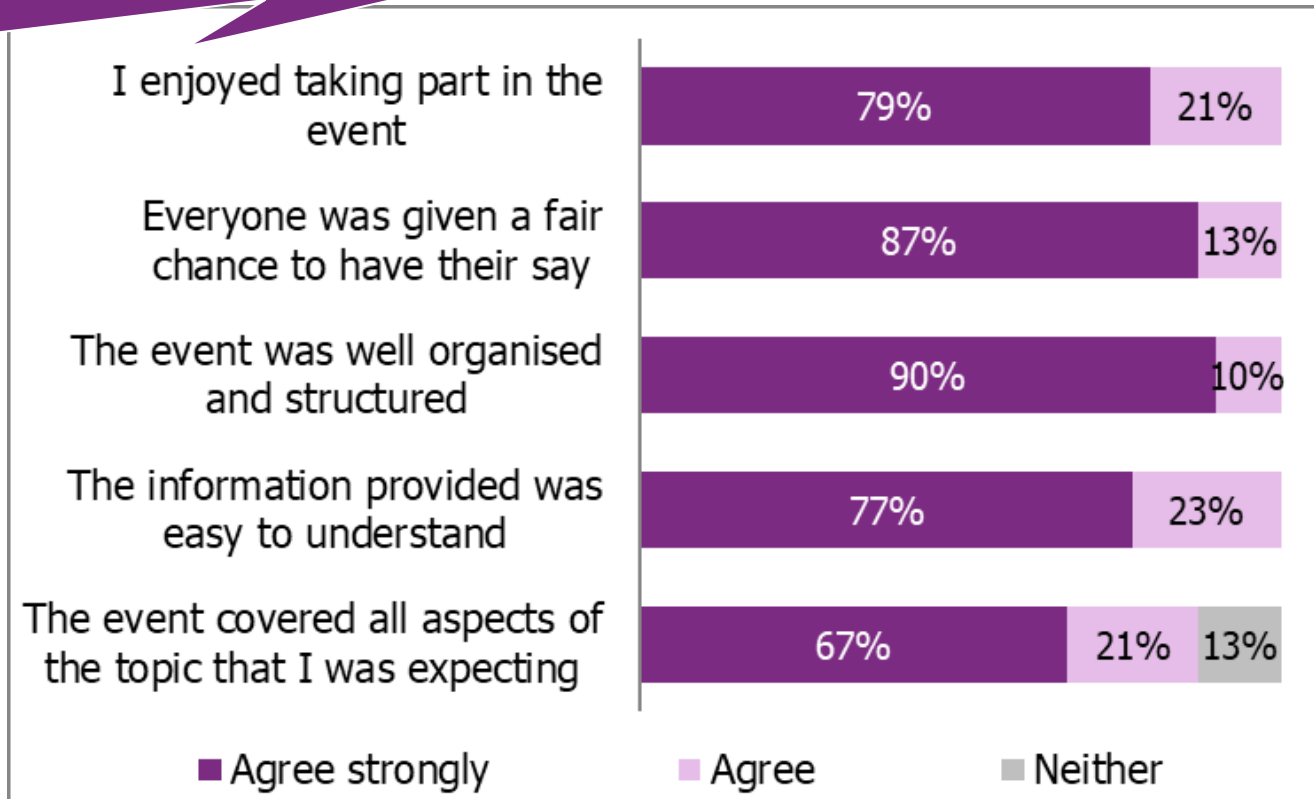




Appendix – workshop evaluations

Positive response to taking part in workshops

Q1. Based on your experience today, please indicate whether you Strongly Agree, Agree, Disagree, Strongly Disagree or Neither Agree or Disagree with each of the following statements...



*None of the participants disagreed with any of these statements

Base = all workshop participants (n=39)

