



IN CONTROL?

An investigation into the patterns of use and level of self-disconnection by gas and electricity Pay As You Go meter users in Northern Ireland





*Making the
consumer voice
heard and making it
count*



Chairman's Foreword



I am pleased to present the first independent research findings on Pay As You Go (PAYG) meter usage and self-disconnection in Northern Ireland, commissioned by the Consumer Council.

This summary presents the main findings and results of the research and includes recommendations to improve the services provided by energy supply companies and in particular, support for customers vulnerable to debt and financial hardship.

The results of the research provide positive confirmation of the benefits and advantages of PAYG as a payment option for electricity and gas customers. It also demonstrates that PAYG is a useful tool in helping low income customers manage their energy consumption and costs better.

However, the research also identifies a small but significant number of customers who are vulnerable to self-disconnection because of their financial circumstances. These are often the people that we fail to notice but yet they need our help the most. The next challenge is to begin collectively to address the issues highlighted by the research and agreed by the key stakeholders and to monitor progress by a variety of means including the Social Action Plans.

I would like to thank everyone who participated in the research including Phoenix Natural Gas (Phoenix) and Northern Ireland Electricity (NIE) for their help and cooperation throughout the project, and MORI who carried out the customer survey.

STEVE COSTELLO
Chairman Consumer Council



Introduction



Background

Pay As You Go (PAYG) meters for natural gas and electricity customers have been used in Northern Ireland since 1999 for gas and 2000 for electricity customers. Until then customers could only pay through a standard credit meter or a Powercard¹ meter (electricity customers only).

Since their introduction no independent review has been carried out with PAYG customers to determine the level of satisfaction and usability of prepayment meters or the level of self-disconnection² and potential reasons behind it.

With one in three households in Northern Ireland living in fuel poverty, high-energy prices and almost one in four households in Northern Ireland using a PAYG meter, the Consumer Council concluded that an independent study of prepayment meter use and levels of self-disconnection should be conducted in Northern Ireland.

The Research

In October 2004, the Consumer Council commissioned MORI Ireland to undertake this research study.³

The research objectives were:

- To investigate the level and pattern of self-disconnection by domestic electricity and gas PAYG meter users in Northern Ireland;
- To investigate patterns of use, understanding and general satisfaction of PAYG as a payment method; and
- To identify preventative measures to self-disconnection and debt.

Existing research on self-disconnection in the United Kingdom (UK) has been limited to a research study commissioned in Great Britain (GB) by the Electricity Association's (EA) Fuel Poverty Task Force in 2001. This was specifically targeted at low-income households in GB.

1. Powercard meters have been removed by NIE. They operated in a similar way to PAYG Keypad meters except that credit was purchased through cards that were inserted into the meter. Powercard meters have now been replaced by the Keypad PAYG meter.

2. Self-disconnection is usually unplanned and occurs when a pre-payment meter customer runs out of credit and is without electricity or gas. Gas and electricity supply does not resume until the customer buys more credit.

3. 500 households in Northern Ireland with PAYG meters were surveyed, (132 gas and 368 electricity) from 31 sample points across Northern Ireland. The questionnaire reflected some of the questions asked in the Electricity Associations 2001 survey. However, given the different sampling technique and demographic profile in Northern Ireland, not all the results can be directly compared.



The Findings

PAYG meters can offer consumers better financial control and management of their energy consumption. They also prevent debt building up. However, for those already in debt, PAYG meters can create new or compounded problems for households vulnerable to self-disconnection and fuel poverty.

Although the number of households suffering energy affordability problems and energy debt may be perceived to be low, it represents significant issues on a personal level for those suffering financial hardship. Energy related debt might also compound the financial problems that some customers are already struggling with on fixed low household incomes. It may also affect the everyday choices a consumer must make, for example between eating and heating.

When self-disconnection occurs it is only the people living in the property who know about it. Even energy supply companies remain unaware that one of their customers has self-disconnected. The findings of this research provide an over-view of the self-disconnection experiences over a period of twelve months for five hundred PAYG customers in Northern Ireland. However, on a day-to-day basis it is difficult if not impossible to know whether a home is without essential services such as electricity and gas, in some instances, for days at a time. The number of households affected may be small but the risks are significant.

In addition to presenting the first independent profile of PAYG use in Northern Ireland, this research provides a better understanding of self-disconnection and helps identify solutions for households in debt and those at risk of debt. A key outcome of this research will be to get energy supply companies to focus on prevention rather than recovery of debt and to strengthen their approach to dealing with vulnerable customers within Social Action Plans and to identify the consumer education, energy efficiency and financial management approaches to assist in addressing the issues.



The findings will also be useful in informing the Anti-Poverty Strategy and identifying vulnerable groups who require particular focus and assistance by the Government and its agencies, community and public representatives and energy supply companies.



How PAYG works

Northern Ireland Electricity (NIE) and Phoenix Natural Gas (Phoenix) both operate a Pay As You Go (PAYG) payment method for their customers but use different meter types and credit purchase systems. The details of both systems are as follows:

NIE

NIE operates a Keypad meter that has a facility to recover debt. Credit can be bought at any Paypoint or Payzone agent across Northern Ireland, using a Home Energy Direct card. The agent will give the customer a receipt that has a 20-digit powercode number on it. This code is then entered into the Keypad meter in order to add the credit. The minimum amount of credit you can buy for a Keypad meter is £2. NIE also provides a 24hr telephone service 7 days a week that allows customers to buy credit over the phone with a debit card.

When the credit on a Keypad meter goes down to £1 (£2 for Economy 7 keypad meters) a low volume sound will occur for two minutes to alert the customer that the credit is low and they need to buy more. When this credit has run out, the meter will provide a further £1 emergency credit. The customer must buy additional credit before this emergency credit runs out or they will self-disconnect. The £1 emergency credit will be automatically recovered from the next credit the customer buys. NIE also provides 'friendly credit' to customers outside the normal emergency credit hours.

This credit is based on time bands (4pm-8am or 11am Monday to Friday and 4pm Friday to 8am or 11am⁴ Monday) during which the electricity supply will not self-disconnect.

Phoenix

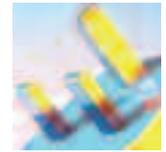
Phoenix operates two different types of meter, a Quantum meter and a Libra meter. The key difference between them is that the Quantum meter has a facility to recover debt whereas the Libra meter does not.

Credit can be bought for both meters from Paypoint agents across Northern Ireland using a Payeasy card for the Libra meter (minimum of £5) and a Quantum card for the Quantum meter (minimum of £2). Any gas bought will be credited to the meter whenever the card is inserted.

The Quantum meter provides a £2 emergency credit whenever normal credit has run out. This will be recovered the next time the meter is topped up. The Libra meter offers a credit reserve facility which activates once the meter has 15 cubic meters of gas credit left, (equivalent to £4). The customer must then buy more credit before they self-disconnect.



4. NIE's friendly credit facility usually finishes at 8am on any weekday morning but can be extended to 11am on request.



Level of self-disconnection

Self-disconnection

The findings have shown that self-disconnection is not an issue for the majority of PAYG meter users. Almost three quarters (72 per cent) of households have never self-disconnected in the past year. Of the 27 per cent that have, the key reasons for self-disconnecting were due to forgetfulness (56 per cent) and for financial reasons (13 per cent). It is the 13 per cent of households that self-disconnected because they do not have enough money that need help the most.

A further one per cent did not know if they had ever self-disconnected.

N. Ireland and GB levels of self-disconnection by energy type

	Gas	Electricity
EA 2001	27%	24%
NI 2004 (low income respondents)	31%	24%
NI 2004 (all respondents)	26%	29%

The table above provides a comparison between the level of self-disconnection identified in the Northern Ireland survey and the EA 2001 survey in GB. However, given that the EA survey was targeted at low income households, the table also provides a comparison of the level of self-disconnection by low income⁵ households included in the Northern Ireland survey. This comparison clearly demonstrates that in general Northern Ireland electricity customers tend to self-disconnect more

than their GB counterparts. However, the comparison also indicates that more low income gas customers in Northern Ireland self-disconnect than low income electricity customers.

Profile of households that self-disconnect for financial reasons

Self-disconnection for financial reasons is highest in low income Northern Ireland Housing Executive (NIHE) households with 2 or more children and unemployed adults on benefits.

The lowest incidence of self-disconnection is in households with persons aged over 60.

Frequency and duration

Of households that did self-disconnect, 56 per cent did so for less than an hour. However, a small but significant number did so for more than 10 hours (9 per cent) and of this, 2 per cent self-disconnected for 1 to 2 days.

For households that self-disconnected for more than 7 hours, 18 per cent were gas customers and 10 per cent were electricity customers.

Key Facts

- 27 per cent of all households stated that they had self-disconnected at least once in the last 12 months. (26 per cent gas customers and 29 per cent electricity customers);
- 9 per cent of households that self-disconnected did so for more than 10 hours (2 per cent did so for on average 1 to 2 days);
- Respondents who did not mean to self-disconnect tended to be without power for short periods of time;
- 13 per cent of respondents who self-disconnected did not have enough money to buy more credit; and
- Households self-disconnecting for financial reasons tend to:
 - Self-disconnect more often and for longer periods of time;
 - Have an income of less than £800 per month; and
 - Include adults on benefits and 2 or more children.

5. An annual household income of less than £12,499 is indicated in the GB EA 2001 survey as a low-income household. The nearest comparison calculated from the income data collected in the Northern Ireland survey is an annual income of less than £11,988.



6 Level of debt

Key Facts

- 20 per cent of all households were in debt when their PAYG meter was installed;
- More than half of households paying debt through their PAYG meter self-disconnected at least once in the last 12 months and 8 per cent had done so more than 20 times;
- Around a third of households with electricity debt owe less than £100;⁶
- The majority (75 per cent) of gas related debt was more than £100;
- No gas respondents indicated a debt of more than £400 when their PAYG meter was installed, compared to 11 per cent of electricity customers;
- 11 per cent of households with debt indicated that their recovery rate was set by the energy supply company without any interaction with the customer;
- Almost half of households in debt pay more than £3 per week to decrease the arrears; and
- 12 per cent of households with debt did not know how much money was recovered through the meter each week.

Level of debt

A fifth of all respondents indicated that they had debt on their account when a PAYG meter was first fitted in their home (1 in 4 of electricity customers and 1 in 10 of gas customers). In comparison, the level of prepayment debt in GB in September 2004 was 14 per cent for electricity and 33 per cent for gas.⁷

The amount of debt owed by respondents varied across electricity and gas customers. While fewer gas customers had debt when the meter was fitted, the amount was likely to be between £100 and £400.

The majority of electricity debt was less than £400. However, a small but significant percentage (11 per cent) of electricity debt reported was more than £400.

Profile

PAYG meter users who are paying off debt through the meter tend to fall into the social classifications, DE (75 per cent) and C2 (15 per cent). Of these households, 81 per cent had a total household income of less than £11,988 per year, (less than £999 per month)⁸ and 42 per cent were in receipt of income support and/or other benefits. Debt was evident across all age groups in particular between the ages 25 and 54 years and reducing from age 55+.



6. Although difficult to identify from the findings, some NIE customer debt recovered through PAYG meter relates to a current bill at the time the customer switched to a PAYG meter and is not debt that has accumulated over a longer period of time.

7. Ofgem Social Action Plan, Quarter Three 2004

8. An annual household income of less than £12,499 is indicated in the GB EA 2001 survey as a low-income household. The nearest comparison that could be calculated from the income data collected in the Northern Ireland survey is an annual income of less than £11,988.



Paying back debt

Energy supply companies discussed the rate at which debt would be recovered through the PAYG meter with more than half of the households who were in arrears. However, 11 per cent of electricity customers with debt stated that they had no contact from the electricity supply company about the recovery rate compared to 1 per cent of gas customers.

More than a quarter of the households in debt when their PAYG meter was installed were still in debt at the time of the survey. Around 1 in 10 of these households did not know how much debt was recovered through their meter per week. This may indicate that some households do not understand how to operate their PAYG meter or poor financial management.

In GB, energy supply companies must set debt recovery rates at a level customers can afford and no higher than £2.80 per week if on basic benefits. This policy does not apply in Northern Ireland, and the findings have shown that at least 5 per cent of households who pay more than £3 per week are on benefits. Almost a fifth (19 per cent) of households in debt pay more than £5 per week towards debt.

The findings show that 38 per cent of households in debt did not know how much debt they still had to pay.





Awareness and use of the emergency credit facility on PAYG meters

Key Facts

- 40 per cent of all respondents stated that they were not aware of the emergency credit facility on their meter;
- 52 per cent had never used the facility;
- The main reasons for using the facility were, 'not realising that they were low on credit' or 'forgetting to charge the card'; and
- 60 per cent of respondents who had used emergency credit did so 10 times or less over the previous 12 months. 23 per cent used the facility more than 11 times.

Awareness

When an electricity or gas PAYG customer runs out of normal credit (the credit that a customer buys) they will enter into 'emergency credit'. The customer must top up the meter before this runs out and they self-disconnect. However, electricity and gas customers will not self-disconnect on weekday evenings or weekends because an additional emergency/friendly credit system operates at these times.

The research findings showed a relatively low level of awareness (59 per cent) of the emergency credit facility on PAYG meters. This result was unexpected given the level

of interaction needed from customers using a PAYG meter. Only 55 per cent of electricity customers stated that they were aware of the facility compared to 70 per cent of gas customers. Of those that indicated they were aware of emergency credit, 87 per cent understood what it was for.

When asked whether they knew how much emergency credit was available on their PAYG meter, only 42 per cent of all respondents stated they knew. When asked to quote how much, the majority of gas and electricity customers thought the amount of emergency credit was approximately £2. This is correct for gas customers on a Quantum meter,⁹ however, the amount of emergency credit available to electricity customers is £1.

Reasons for using the facility

Generally, households report that they use the emergency credit facility because they forget to top up their credit rather than because of financial constraints.

Of the households who use the emergency/friendly credit facility, 23 per cent did so more than 11 times in the past year, which is almost once a month. This suggests that it is a useful facility for many respondents.



9. Libra meters offer a credit reserve facility that is equivalent to £4 of gas credit.



Pay As You Go meter use and satisfaction



Key Facts

- 89 per cent of all respondents stated that using a PAYG meter has helped them manage their energy consumption better across all income groups;
- 70 per cent of all respondents stated that there were no disadvantages to PAYG meters;
- 95 per cent of all respondents indicated that they are very satisfied/quite satisfied with their PAYG meter;
- 19 per cent of all households had a PAYG meter installed when they moved in;
- 77 per cent of all respondents top up their meter at least once a week; and
- 52 per cent of all respondents buy between £6 and £10 of credit each time they top up their meter.

Just under two thirds (64 per cent) of all households surveyed asked for a PAYG meter to be installed for reasons including:

- Having difficulty paying bills;
- Better budgeting; and
- PAYG being the preferred payment option.

However, more gas customers (15 per cent) than electricity customers (5 per cent) were not given a choice by their supplier about having a PAYG meter. This result reflects Phoenix’s policy to install PAYG meters in Northern Ireland Housing Executive (NIHE) properties and private landlord multiple occupancy properties.

Households with PAYG meters for electricity and gas could be seen to be at more risk from self-disconnection because the customer must manage two PAYG meters rather than one. However, this experience in operating and managing PAYG meters may have contributed to a lower level of self-disconnection. 74 per cent of households with both meters had never self-disconnected compared to 72 per cent of all households surveyed.

The majority (82 per cent) of households buy a regular amount of credit each time they top up their meter. The responsibility for doing this



tends to be allocated to 1 or 2 people in the household. More than a third (38 per cent) of all respondents topped up their meter at least once a week at a local outlet, buying between £6 and £10 each time. However, the findings also showed that 14 respondents (3 per cent) bought at least £20 of credit per week, which equals an annual electricity bill of £1040.

Overall, both gas and electricity customers find PAYG meters a convenient and easy way to pay for their energy across all income groupings and age bands.



Advantages and disadvantages

The main advantages of PAYG meters focus on the freedom and flexibility that they can offer. They were described by households as, 'no bills', (79 per cent), 'allows household to budget for their electricity/gas', (31 per cent), and 'allows household to feel more in control of their energy consumption', (27 per cent).

The disadvantages of PAYG meters were associated with the level of self-management needed by consumers to keep their energy supply on, forgetting to top up and electricity/gas running out, (11 per cent), and topping up being a nuisance, (10 per cent). However, 70 per cent of households stated that there were no disadvantages to PAYG meters.

The majority (93 per cent) of all respondents stated that they had no reason to complain about their PAYG meter. There was very little difference between electricity and gas responses in these areas.





Conclusions

The research findings provide a clear, positive message about PAYG as a payment method for Northern Ireland customers. However, the findings also indicate that a core group of prepayment customers are at risk of self-disconnection because of their financial circumstances. The total number represented by this group may be small, (4 per cent of the survey sample base which is equivalent to 6,600 of the total PAYG customer base of 165,000 in Northern Ireland at the time of the survey). However, the risks these households face are significant. Their financial circumstances have exposed them to periods without basic essential resources like heat, light and the power to cook – things that most people take for granted.

On the broader front, the Consumer Council is concerned about the combined effect on the household budget of energy, rates and future water bills. We therefore consider that a wider response is required involving all of the key stakeholders, not just energy suppliers.

In the final section, the Consumer Council makes a number of recommendations that should enable customers vulnerable to debt and suffering financial hardship to keep their gas and electricity supplies switched on.

Customers vulnerable to debt

Before a PAYG meter is installed energy supply companies can clearly identify customers who are in arrears with their electricity or gas payments. However, it is crucial that energy supply companies monitor this debt to ensure it is caught early and solutions are offered before the debt becomes unmanageable. Therefore, the Consumer Council believes that suppliers must be responsible in ensuring that customers are not allowed to accumulate high levels of debt from the outset.

Debt recovery

Ofgem¹⁰ sets out strict guidelines that require gas and electricity suppliers to provide detailed guidance within their Codes of Practice for customers who may have difficulty in paying their bills.

This guidance explains that weekly repayments for energy customers on benefits should be based on how much the customer can afford to pay and should not normally be above the minimum Fuel Direct level¹¹, (currently set at £2.80).

In Northern Ireland, electricity customers in debt who are on benefits have a maximum recovery rate of 25 per cent of each credit purchased. The findings showed that some PAYG customers pay up to and in some cases more than £20 per week to top up their meter. If a household's average weekly credit purchase is £20 then £5 of this could potentially be taken directly to recover debt.¹²

- 10. Ofgem - The Office of Gas and Electricity Markets - Ofgem is the regulator for Britain's gas and electricity industries. Its role is to promote choice and value for all customers.
- 11. Fuel Direct is an energy payment method for customers on benefits that withdraw a maximum weekly amount (£2.80) directly from benefit payments to pay for energy consumption.
- 12. The findings have shown that 19 per cent of households in debt are paying £5 or more a week to pay off the debt. Also, 29 respondents top up their meter with between £16 and £20* per week and 7 respondents £20+* per week.

* It should be noted that some respondents indicated topping up by these amounts more than once a week.



For a household on benefits this would be £2.20 more than the Ofgem requirement.

If a customer is experiencing difficulties, NIE will refer them to the appropriate money advice agencies who will advise NIE of how much the customer can afford to pay.

Debt recovery rates for gas customers are determined in consultation with the customer by the supplier. Currently, there is no contract between Phoenix and an independent money advice agency for customers on benefits who cannot afford to pay. However, customers are made aware of agencies that may be able to offer debt advice.

Debt advice

In Northern Ireland the main organisations that provide debt and money advice are Citizens Advice (formally CAB), and organisations that come within the remit of the umbrella group Adviceni. These agencies work independently from one another and are generally located in larger towns across Northern Ireland, although outreach services may also be provided to smaller towns and villages.

NIE sponsors both Citizens Advice and Adviceni to provide advice to all of their customers, particularly those customers having problems paying their bills. This may also include a benefits health check for all customers.

In line with the Northern Ireland Anti-Poverty Strategy and the Social Services Agency goal to maximise benefit uptake, it would be important for all

energy supply companies to be able to refer customers vulnerable to debt to a money advice agency to receive a benefits health check.

In GB, suppliers such as British Gas and EdF Energy have set up 'Trust Funds', that aim to help people take control of their finances by reducing the burden of their debts and helping them meet their future bills. They do this through the provision of money advice and grants to individuals to cover the payment of energy bills and other essential household costs. As a result, those suffering severe financial hardship are given a fresh start free from debt.

British Gas is also linked to the National Debt Line an advisory service which offers customers expert debt counselling and advice.

Restart schemes are another debt related initiative popular with water companies in GB. This is where a supplier agrees an affordable payment plan with the customer with the incentive that if the customer keeps the payments up, for example over one year, the supplier will reduce the amount of debt owed by the amount the customer has paid. If they keep the payments up for two years then the supplier writes off all remaining debt. The aim of these schemes is to develop customer commitment and responsibility to managing their debt in the longer term. These schemes also offer expert debt advice.



Increasing awareness of meter use

The research findings showed that many customers do not fully understand how their PAYG meter works, particularly the emergency credit facility. This could be due to customers moving house or simply forgetting instructions they were given when the meter was first fitted. Despite ongoing communication from NIE, there is less awareness among electricity customers.

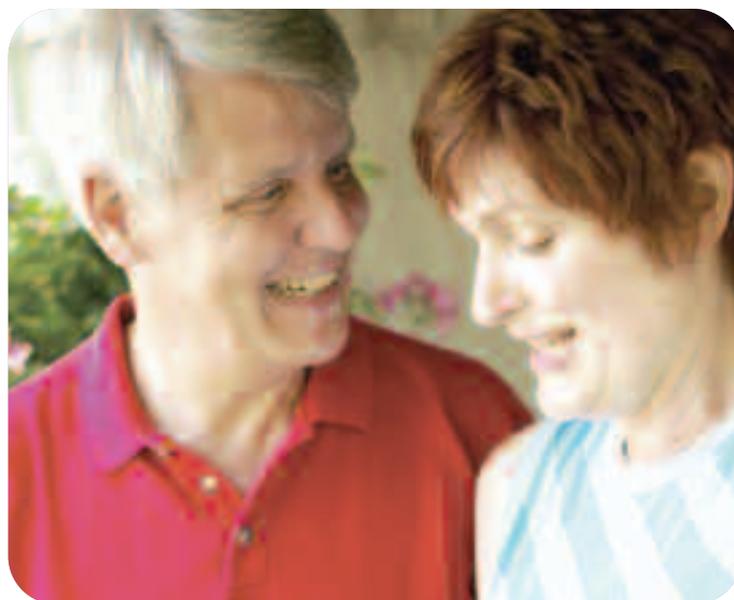
Telephone vending

NIE currently offers its customers the facility to buy credit for their meter over the telephone using their local rate number 08457 455 455.¹³ The Consumer Council believes that this is an excellent service for customers that should be used more. The findings showed that only 3 per cent of respondents bought their electricity credit this way.

Since the survey NIE have enhanced this service considerably by introducing a 24 hour, 7 days a week vending service and proactively promoting the facility to their customers. This has resulted in a steady increase in telephone vending. The Consumer Council welcomes this initiative.

Equitable tariffs

The Consumer Council welcomes the commitment from NIE and Phoenix to ensure that PAYG tariffs in Northern Ireland continue to be offered at a discounted rate compared to the Standard Credit tariff. In GB, PAYG customers tend to pay more than customers using other payment methods. Given the growth in prepayment meters in Northern Ireland (approximately 165,000 households at the time of the survey), Phoenix's policy of installing PAYG meters in NIHE properties and the fact that that consumers may be able to choose from a range of suppliers in the future, it is vital that suppliers ensure that an equitable tariff is maintained.



¹³ NIE can also provide an additional friendly credit to customers outside the normal emergency credit hours, (4pm-8am Monday to Friday and 4pm Friday to 8am or 11am Monday) to avoid self-disconnection.



Recommendations

The Consumer Council makes the following recommendations for action.

1. Energy supply companies in Northern Ireland should ensure that customers vulnerable to debt are identified early and offered appropriate debt solutions before debt becomes unmanageable. This could be achieved through a flag or alert within an energy supply company's billing system.
2. Ofreg should require energy supply companies to provide guidance within their Codes of Practice to customers who may have difficulty paying their energy bills.
3. Ofreg should review guidance on debt repayment in conjunction with energy supply companies to reflect the maximum debt recovery rate for customers on benefits produced by Ofgem.
4. Energy supply companies, particularly NIE, should review their communication and promotional activity to ensure that customers fully understand their PAYG meter's operation, management and debt control functions. This is also an opportunity for energy supply companies to work with organisations such as NIHE, and housing associations to help identify the most vulnerable customers that would benefit from a better understanding of their PAYG meter.
5. Energy supply companies should partner with organisations such as the EST¹⁴ Advice Centre and NEA¹⁵ to provide PAYG customers with information and advice on energy efficiency, especially to vulnerable groups.
6. All energy supply licences should require energy supply companies to refer customers known to be vulnerable to debt or suffering from financial hardship to money advice agencies to receive a benefits health check.
7. The referral system between energy supply companies should be effective in ensuring that all customers in need of debt/money advice receive it from an appropriate agency. This could be achieved through a straightforward follow-up procedure with the customer.

14. EST (Energy Savings Trust)

15. NEA (National Energy Action),
a fuel poverty charity.



8. In light of the increasing burden of household bills (such as energy, rates and water) all key stakeholders should consider carefully the issue of affordability and the potential impact of available instruments such as:
 - Government intervention (especially the timing, level and frequency of winter fuel payments);
 - Social Security assistance;
 - Benefit maximisation;
 - Supplier intervention (for example, the possible applicability of the trust funds and restart schemes in existence in Great Britain); and
 - Regulatory mechanisms (such as levies).
9. Energy supply companies should maintain a discounted tariff (in relation to the standard credit tariff) for PAYG customers in Northern Ireland.
10. NIE should build on the success of their telephone vending facility by continuing to promote the availability of the facility to all its PAYG customers.
11. Ofreg should consider how these recommendations can be incorporated as performance criteria within Social Action Plans.
12. Consumer Council information is normally provided to customers on the back of bills. Since PAYG customers do not receive bills the Consumer Council should extend its communication and promotional activity to PAYG customers and ensure these customers fully understand the PAYG meter, its operation, management and debt recovery facility.
13. The Consumer Council will continue to target and review its work programme towards helping vulnerable energy consumers under its key corporate theme, 'Championing and safeguarding the interests of the consumer, particularly the vulnerable'. We will establish links with this work with the objectives of the Office of First Minister and Deputy First Minister (OFMDFM) Anti-poverty Strategy Unit.





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