

# Driving fair outcomes for vulnerable consumers across UK markets

EVENT REPORT

FEBRUARY 2020

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## I. Introduction

The event, *Driving fair outcomes for vulnerable consumers across UK Markets*, focused on how data and research has been and can be used to improve outcomes for consumers in vulnerable circumstances.

This document sets out an overview of the talks and panel session, a summary of activities on the day and pre-event survey responses, a list of delegates, and information about the UKRN's work on vulnerability.

### Positive Outcomes

A varied agenda shone light on the good work being done to support consumers in vulnerable circumstances, both in terms of research studies and practical solutions. The agenda also provided for some challenging Q&A sessions and the sharing of different perspectives. In combination with the *Insight and Case Studies* handout, the event's objective to improve understanding of how outcomes can be improved through the use of data and research was achieved.

The event was a strong demonstration of UKRN-led collaboration, bringing together over 120 delegates from a range of sectors and backgrounds, including representatives from regulators, industry, government, consumers groups and academia. The UKRN was able to facilitate working across UK markets and enable the sharing of experience and insight. The UKRN will continue to support cross-sector working and help to connect people within the vulnerability space.

Insight gained on the day and from the pre-event survey will be invaluable in helping the UKRN to achieve its aims, particularly in relation to its planned research. The event also helped to highlight the work and purpose of the UKRN itself.

The event was supported by a summary of data and insight, examples of good practice and the results of a pre-event survey. The event was also supported by two videos: [one](#) illustrating how services can be made to work for consumers in vulnerable circumstances, and a second featuring the current and former CEOs of Ofwat, Ofcom, the CAA and the FCA talking about their commitment to and work on vulnerability.

The feedback received has been positive, with particular mention of the diverse range of speakers and delegates, a very engaging and solutions-focused panel session, and the usefulness of the supporting material.

Finally, the UKRN would like to thank all those who were able to attend; your attendance and participation was greatly valued and is what ensured that the event was a success.

## 2. Agenda

### Welcome and introduction

Jonathan Oxley, UKRN

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### Improving outcomes for vulnerable consumers: the benefits and how to measure outcomes

Chris Fitch, The Money Advice Trust / Bristol University  
Paula Searle, StepChange Debt Charity

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### Data science and AI research for better outcomes

Christine Foster, The Alan Turing Institute

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### Panel session on the use of research and data to identify vulnerability-related issues and improve outcomes

Aisling Ní Chonaire, The Behavioural Insights Team  
Katie Alpin, Money & Mental Health  
Jane Rumble, Ofcom  
Julia Dunn, Nationwide  
Louise Beardmore, United Utilities

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### Existing research and behavioural insights

Stephen Dunne, CDEI  
Stefan Hunt, CMA

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### The UKRN's research

Attricia Archer, UKRN

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### Closing remarks

Jonathan Oxley, UKRN

### 3. Talks

#### Jonathan Oxley

Jonathan is the UKRN Chief Executive.

Jonathan joined Ofcom in 2014 as Group Director for Competition and was appointed to the Board in December 2014. In December 2019, Jonathan became Interim Chief Executive of Ofcom.

Before joining Ofcom, Jonathan was a Partner in PwC's Strategy and Economics practice, specialising in telecoms, media and technology.



Jonathan opened the event, noting the wide-range of people and organisations in attendance and the shared commitment to support those who find themselves in vulnerable circumstances. Jonathan set out the event's objective to recognise the good progress made, but also to start a conversation about next steps and future opportunities using data.

Jonathan described vulnerability as a long-term concern and, while acknowledging momentum and the encouraging signs of improvement, said it is right that regulators and companies are challenged to do more to ensure that consumers in vulnerable circumstances do not experience poor outcomes.

With regard to good practice, Jonathan spoke about the importance of leadership influencing an organisation's culture. Jonathan also spoke about the importance of having a collaborative mindset, emphasising the benefits of firms working with their competitors on vulnerability issues.

Jonathan noted the need to address legal barriers to data sharing to improve outcomes, but also stressed that there is more that can be done now using existing data.

Jonathan stated that the legitimacy of the regulatory system requires addressing vulnerability properly and it is therefore crucial that regulators work together, along with consumer groups and industry, to achieve outcomes for consumers in vulnerable circumstances.

Jonathan also closed the event, again emphasising the need for strong leadership and encouraging board members to challenge their leaders to think and talk more about vulnerability.

## Chris Fitch

Chris is the Money Advice Trust's Vulnerability Lead and a Research Fellow at Bristol University's Personal Finance Research Centre.

Chris has run a programme of research on vulnerability financial difficulty, and financial services. This has involved research underpinning the design of the Debt and Mental Health Evidence Form and a UK study of the experience of frontline creditor staff when working with customers in vulnerable situations.



Chris spoke about data and outcomes, reflecting on firms' progress and what is needed to move forward.

Chris observed that firms perceive regulatory signals and are already working on improving outcomes for consumers in vulnerable circumstances, with many starting to use outcome measurements.

Chris spoke about three aspects in relation to outcome measurement: data fundamentals (do firms know their vulnerable customers?), data strategy (do firms have a strategy around identification and support?), and data and outcomes (which ones really help?).

On data fundamentals, Chris emphasised that what makes someone vulnerable is

not the same as what they are vulnerable to. If we fail to acknowledge this difference, we cannot understand the potential customer detriment and firms will be unable to decide if the vulnerability is relevant to their service, what the necessary support interventions are and, if required, how to effectively signpost or refer to third party services.

On data strategy, Chris identified that the lack of policy around vulnerable data is problematic. Such data is often split and scattered across firms, with no single person responsible for all the vulnerability data.

On data and outcomes, Chris spoke about the need to develop outcomes which practically help consumers. We can start by thinking about what a vulnerable customer would want us to consider and Chris suggested three elements to this: check that support is required; if it is required, provide effective support; and work to optimise experience and prevent harm.

## Paula Searle

Paula is the Vulnerability Product Manager for StepChange Debt Charity, responsible for the organisation's vulnerability strategy and client journey.

Paula has been employed at the Charity for 12 years in various roles and her work has included developing a wellbeing service to identify and support those suffering with anxiety or depression alongside their financial difficulties.



Paula spoke about how StepChange has used outcomes measurement practically to improve its debt advice service. StepChange started looking at outcome measurement in 2017 and published the [findings](#) from its pilot a year ago.

Paula explained that StepChange started to measure outcomes in order to better understand how clients' lives were being changed after receiving debt advice; while StepChange had a vast amount of client data, it did not have data about the impact of its work. Paula also explained that StepChange considered measuring outcomes would be a good way to evidence its policy work and to ensure that all of its clients benefit from its services in similar ways.

Paula set out StepChange's definition of an outcome: a specific result(s) flowing from an activity, specified as a change state or the absence of an expected change state. After agreeing a definition, the next step was to create a theory of change model, representing the ideal view of how a client would progress from debt crisis. StepChange then developed a question set which would allow it to capture the necessary data to measure outcomes against. Paula described the data collected and some of the conclusions that StepChange was able to draw.

Paula spoke about how StepChange now routinely gathers more data and has a better picture of client progress following debt crisis. StepChange uses this outcome data to focus its work and assess how services can be developed when improvements to outcomes are required.

## Christine Foster

Christine is Managing Director for Innovation at The Alan Turing Institute, responsible for driving forward the Turing's goal to translate its data science and artificial intelligence research into real-world impact.

Previously, Christine advised Virgin Media on implementing machine learning models, and Liberty Global on building a world-class data science team.



Christine gave an inside look into the kind of datasets being created, collected and transformed, asking the audience to think about the type of datasets they use in their work.

Christine gave the example of the dataset used in the response to the 2016 earthquake in Ecuador, where 2,000 volunteers identified potential damage by comparing satellite images covering 25,000km<sup>2</sup> in 12 hours. The UN and others were then advised where to focus their disaster response efforts.

Christine gave a second example of the National Disease Registration Service, a 15-year project to collect, connect and curate information on cancer. This kind of dataset is often what people think about when they think about data (expert sources at scale, assembled in one place), but sometimes datasets can look very different and be so unstructured that they do not even look like data. However, Christine advised that such datasets may just need to be looked at in a different way.

Christine spoke about a final example of ImageNet, consisting of 14m photos and 20,000 labels. While this was a big breakthrough in machine vision, Christine highlighted the problem of moving it into other contexts and asked the audience to think about a dataset which has been moved and transformed; what journey did it take and was that journey appropriate? Christine warned about ending up with an essentially new dataset, with new outcomes and unintended consequences.

Christine challenged the audience to think more about the datasets they might use in their work: what are they using it for? Who does it cover and who does it exclude? How did it change and what was it merged with? What is it missing? Christine emphasised that it's not just the algorithms that matter, but also the data that underpins them.



## Stephen Dunne

Stephen is a Senior Policy Advisor at the UK's Centre for Data Ethics and Innovation (CDEI), where he has been delivering the review of online targeting.

He trained as a data analyst in big data firm dunnhumby. His more recent background is in the Civil Service, including at the Cabinet Office and the Department for International Development.



Stephen spoke about the CDEI's review of attitudes towards online targeting and outlined its research findings.

Stephen described 'online targeting' as any practice used to analyse someone's information and then customise the online experience. It can be used to help people make informed choices and identify vulnerability, but there are also risks.

Stephen explained that online targeting is seen as beneficial by helping people navigate the online world, but the research raised concerns about the potential negative impacts on people in vulnerable circumstances.



Stephen described how research participants thought that vulnerable people may be susceptible to negative practices and called for an improvement to users' awareness and controls, though they appreciated that many people – including vulnerable people – may not be able to navigate these systems, even when 'improved'.

Stephen talked about how participants strongly backed the use of data to identify and support vulnerable people, with most supporting some level of risk-based monitoring to identify at-risk behaviours, high ethical standards and oversight (consent, transparency, etc.), and self-identification mechanisms.

Stephen noted that participants found it difficult to think about what should happen once someone has been identified as vulnerable and how to avoid harmful consequences. Participants suggested that the default settings for personalisation and data sharing for vulnerable people should be off, but if these settings are off, then vulnerability is less likely to be identified.

Stephen described the research's conclusion that it is okay to use data to support people (with high ethical standards and effective oversight, etc.), but that data-driven services can lead to harm. Stephen emphasised that what people want is greater transparency, accountability and control.

## Stefan Hunt

Stefan is the Chief Data and Technology Insight Officer at the Competition and Markets Authority.

He previously founded the Behavioural Economics and Data Science unit at the FCA, which provided state-of-the-art solutions to regulatory problems using field and lab experiments, econometrics and machine learning.



Stefan spoke about how behavioural insights can be used to protect consumers in vulnerable circumstances. Stefan introduced the CMA's consumer vulnerability research programme, a year-long programme targeted at the 'poverty premium' and focusing on four characteristics: poor mental health, old age, physical disabilities and low-income.

With regard to remedy design, Stefan talked about the importance of finding out what works, inclusive design, using data and intermediaries, changing business practices and regulating outcomes. Stefan went on to describe the CMA's consumer enforcer's approach which, informed by learning from insight panels, considers how a misleading or aggressive practice could affect a consumer in vulnerable circumstances.

Stefan explained that behavioural insights is an inductive approach to policy making that combines insights from psychology, cognitive science and social science with empirically-tested results to discover how people make choices. Stefan talked about how it has been used by the CMA in its work on the loyalty penalty and funerals, and how behavioural insight gave the CMA a hold on understanding what causes issues, identifying harmful practices, and devising and testing remedies.

Stefan set out the next steps for the use of behavioural insights at the CMA, focusing on: embedding behavioural insight in markets and enforcement cases; considering a variety of digital practices, e.g. online reviews; recognising the huge potential from harnessing the power of (matched) data; and examining algorithmic targeting.

## Attricia Archer

Attricia is the UKRN Vulnerability and Consumer Director. Attricia has worked in financial regulation for over 20 years with the last 5 years spent on consumer issues.

While leading the Consumer area at the FCA, Attricia was responsible for the initial Financial Lives research report and the Consumer approach paper, together with a number of other consumer papers.



Attricia talked through the UKRN's work on vulnerability (see below for more details) and, specifically, the UKRN's research plans. Attricia focused on the unique role that the UKRN has in this space as it works across many sectors and is able to 'join the dots'.

Attricia explained that the UKRN is in the process of a literature review on the identification of vulnerable consumers and is at the early stages of the process for commissioning a larger piece of research.

## 4. Panel session

The panel discussion explored the use of research and data to identify vulnerability-related issues and improve outcomes, with panellists giving examples from their own experience.

**Aisling Ní Chonaire**  
Principal Advisor, The  
BI Team



**Katie Alpin**  
Interim CEO, Money  
& Mental Health



**Jane Rumble**  
Consumer Policy  
Director, Ofcom



**Julia Dunn**  
Chief Risk Officer,  
Nationwide



**Louise Beardmore**  
Customer Service  
Director, United  
Utilities



The panel discussed topics such as the ways in which data can be used to proactively support consumers in vulnerable circumstances, how we can promote long-term affordability, what behavioural insight can tell us about how consumers make complex decisions, how we can collaborate with other companies and address the particular needs of local customers, and how vulnerability may change.

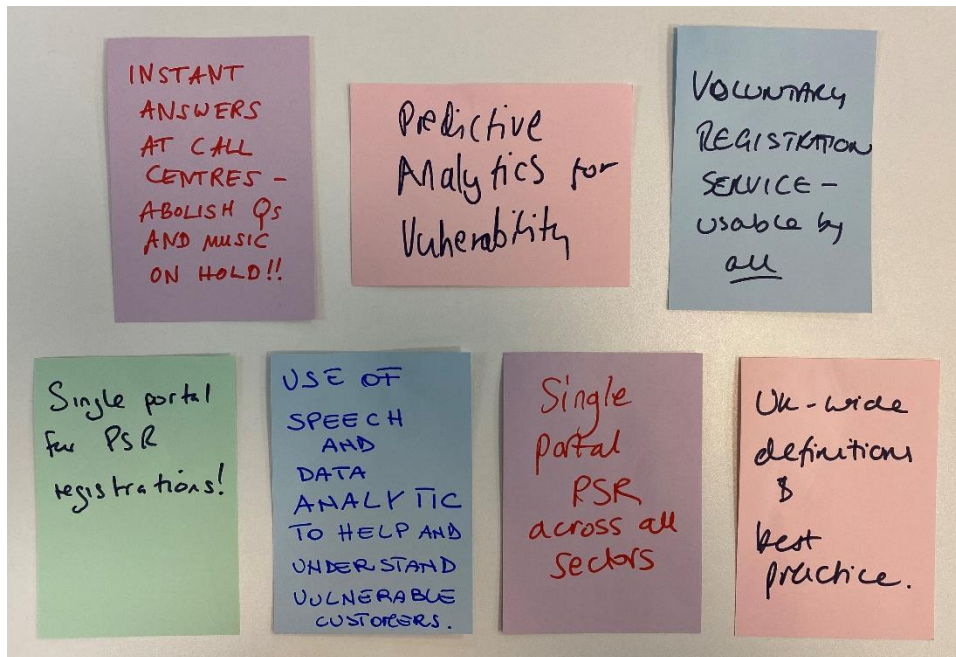


## 5. Delegate interaction

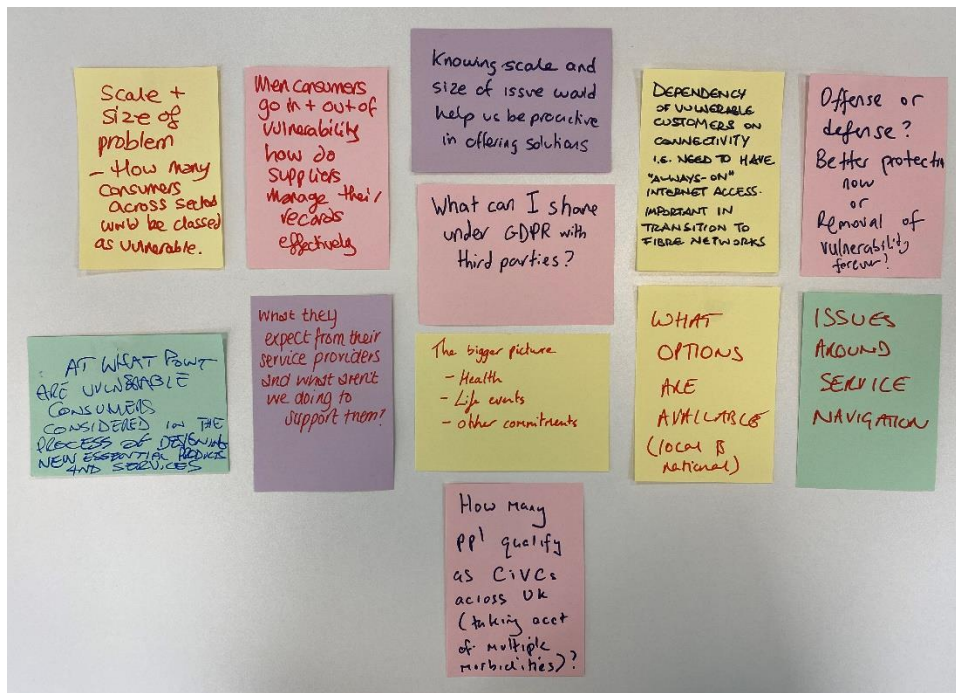
### Activities on the day

At the event, delegates were asked to answer two questions.

#### 1) If you were not subject to constraints, what one initiative would you implement?



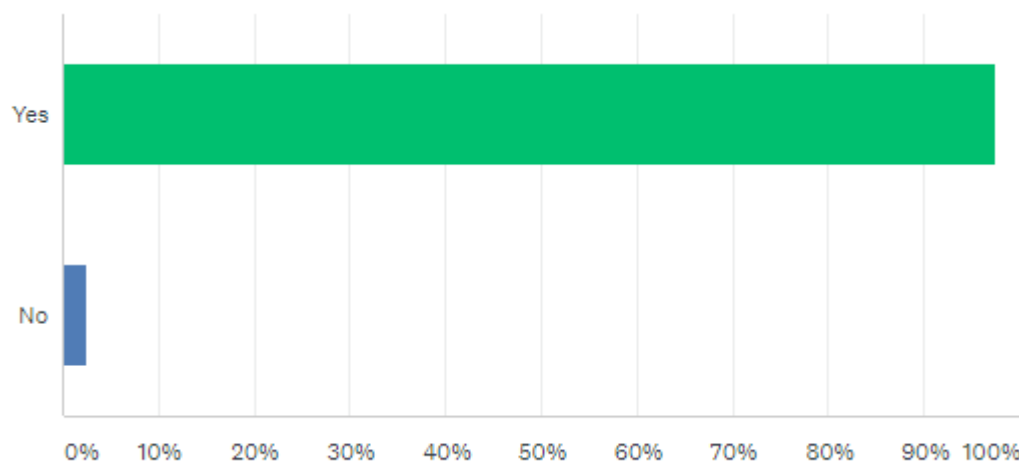
#### 2) What do you not know about vulnerable consumers that you'd like to know?



## Pre-event survey

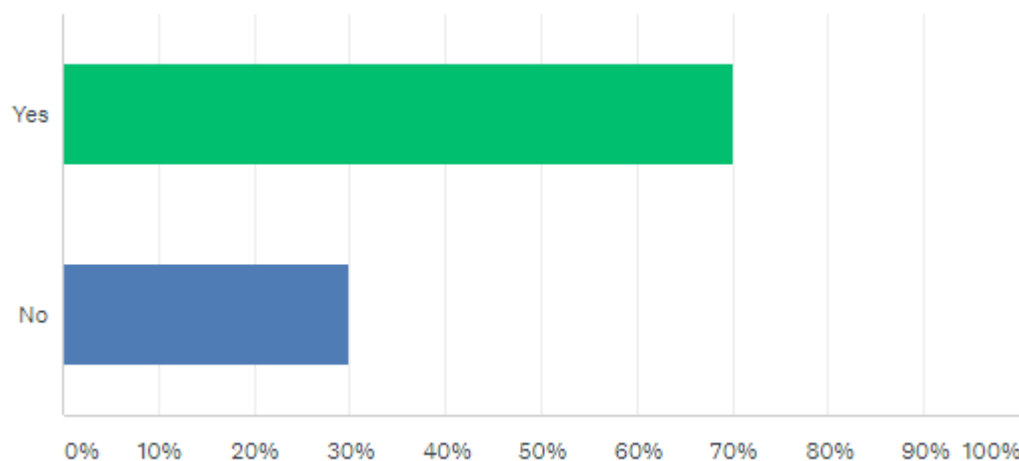
As part of the preparation for the event and to help the UKRN make the day as valuable as possible, delegates were asked to complete a short survey.

### 1) Has research and data been useful in informing initiatives to improve consumer outcomes in your industry?



97.5% of respondents said that yes, research and data has been useful.

### 2) Do you think your industry has specific, differentiated vulnerability issues?



70% of respondents said that yes, their industry does have specific vulnerability issues.

### 3) If you could pick one topic related to consumer vulnerability to research further, what would it be?

Responses to this question focused on the following themes:

- Consumers' experiences and expectations
- Consumer behaviour and fostering engagement
- Collecting, using and sharing consumer data

- Identifying and responding to specific types of issues: transient vulnerability, hidden disabilities, rural vulnerability
- Service affordability, accessibility and design
- Vulnerability online: opportunities and threats
- The role of consumer protection law and company policies
- The impact of credit referencing on poverty levels

## 6. Delegates List

<b>Aisling Ní Chonaire</b>	The Behavioural Insights Team	<b>Graham Smith</b>	NI Consumer Council
<b>Alan Meikle</b>	Diligenta	<b>Helen Forrest Hall</b>	TPR
<b>Albert Phelps</b>	Nationwide	<b>Hilary Patel</b>	DWP
<b>Alena Kozakova</b>	Ofwat	<b>Ian Hulme</b>	ICO
<b>Alex Skirvin</b>	The Bar Standards Board	<b>James Hawthorne</b>	Ofwat
<b>Alexandra Jones</b>	The Registry Trust	<b>James Plumb</b>	Ofcom
<b>Amanda Davis</b>	Ofcom	<b>Jane Rumble</b>	Ofcom
<b>Amanda Keech</b>	NFU Mutual	<b>Janet Wood</b>	New Power Report
<b>Amie Purcell</b>	Ofcom	<b>Jill Hendry</b>	Electricity North West
<b>Andrew Ward</b>	Ofcom	<b>Jo Crinson</b>	Electricity North West
<b>Annette Egginton</b>	FCA	<b>Jo Giles</b>	Cadent Gas
<b>Arina Cosac</b>	Ofgem	<b>Jo Hill</b>	TPR
<b>Attricia Archer</b>	UKRN	<b>Joanna Scott</b>	Wessex Water
<b>Benjamin Burns</b>	The Bar Standards Board	<b>Joe Duffield</b>	UKRN
<b>Carl Packman</b>	Fair By Design	<b>John Coverdale</b>	BEIS
<b>Carl Pheasey</b>	Ofwat	<b>John French</b>	NI Consumer Council
<b>Caroline Gobena</b>	PSR	<b>John Hasar</b>	CMA
<b>Catherine Contiguglia</b>	Ofgem	<b>John Larkinson</b>	ORR
<b>Catherine Nicholson</b>	UKRN	<b>Jonathan Minter</b>	Intelligent Patnership
<b>Charles Randell</b>	FCA	<b>Jonathan Oxley</b>	Ofcom
<b>Charlotte Dubern</b>	Phone-Paid Services Authority	<b>Joseff Mayberry</b>	Ofcom
<b>Chris Fitch</b>	Bristol University	<b>Joseph Surtees</b>	Cabinet Office
<b>Christine Foster</b>	Alan Turing Institute	<b>Julia Dunn</b>	Nationwide
<b>Claire Milne</b>	Antelope Consulting	<b>Julia Mundy</b>	Financial Services Consumer Panel
<b>Clare Symonds</b>	Scope UK	<b>Julie McLynchy</b>	Phone-Paid Services Authority
<b>Colin Brooks</b>	Energy UK	<b>Karen McCalman</b>	Western Power
<b>Conor D'Arcy</b>	Money & Mental Health	<b>Karthryn Hardy</b>	PSR
<b>Daniel Turnball</b>	CMA	<b>Katie Alpin</b>	Money & Mental Health
<b>David Steele</b>	themoneycharity	<b>Keith Richards</b>	Financial Services Consumer Panel
<b>Doug Taylor</b>	Independent consumer consultant	<b>Kevin Smith</b>	UKRN
<b>Emily Keaney</b>	UKRN	<b>Kiera Schoenemann</b>	Ofgem
<b>Emma Chadwick</b>	UKRN	<b>Kruti Patel</b>	DEFRA
<b>Erik Porter</b>	themoneycharity	<b>Laura Murrell</b>	DEFRA
<b>Florence Brunert</b>	Citizens Advice	<b>Leen Petre</b>	Ofcom
<b>Francis McGee</b>	Financial Services Consumer Panel	<b>Lesley Dow</b>	SSE
<b>Gabrielle Stewart</b>	LSB	<b>Lindsey Fussell</b>	Ofcom
<b>Georgina Brett</b>	FCA	<b>Lisa Etwell</b>	Ofcom
<b>Gordon McCullough</b>	Research Institute for Disabled Consumers	<b>Louise Beardmore</b>	United Utilities
		<b>Louise Camacho</b>	Diligenta
		<b>Luca Schiavoni</b>	Assembly Research
		<b>Luxmmi Varathan</b>	Treasury



<b>Maria-Jose Barbero</b>	FCA	<b>Sara Savoia</b>	Vodafone
<b>Martin Coppack</b>	Fair By Design	<b>Sarah McKenzie</b>	FCA
<b>Marvin Luttrell</b>	KCOM	<b>Sean Slack</b>	Ofgem
<b>Mary Davies</b>	Economic Policy Associates Ltd	<b>Selina Chadha</b>	Ofcom
<b>Matthew Bourne</b>	UKRN	<b>Sharon Darcy</b>	UKRN Expert Panel / Sustainability First
<b>Matthew Cherry</b>	PSR	<b>Sian Williams</b>	Toynbee Hall
<b>Matthew Cole</b>	nPower	<b>Sina Patel</b>	PSR
<b>Matthew Tregear</b>	Ofwat	<b>Siobhan Dennehy</b>	BEIS
<b>Melissa Jones</b>	EE	<b>Stefan Hunt</b>	CMA
<b>Nathan O'Brien</b>	Virgin Media	<b>Stefanie Schultheis</b>	The Behavioural Insights Team
<b>Nicole Trinder</b>	UKRN	<b>Stephanie Tobyn</b>	ORR
<b>Parul Shah</b>	CMA	<b>Stephen Dunne</b>	CDEI
<b>Paula Searle</b>	StepChange Debt Charity	<b>Steve Crabb</b>	Self-Employed
<b>Peter Cartwright</b>	Nottingham University	<b>Steve Donovan</b>	SSE
<b>Peter Smith</b>	National Energy Action	<b>Stuart Holland</b>	Equifax
<b>Peter Tyler</b>	UK Finance	<b>Sue Jackson</b>	Gemserve
<b>Rahat Siddique</b>	CBI	<b>Teresa Perchard</b>	UREGNI / Affinity Water
<b>Rebecca Langford</b>	FCA	<b>Tom Marsland</b>	Energy UK
<b>Rebekka Rumpel</b>	Citizens Advice	<b>Tom May</b>	LSB
<b>Richard Hallewell</b>	Ethecal	<b>Willow Warder</b>	ICO
<b>Rickard Granberg</b>	TalkTalk	<b>Yih-Choung Teh</b>	Ofcom
<b>Rob Wesley</b>	Water UK	<b>Zoe McLeod</b>	Sustainability First
<b>Sam Gold</b>	Which		

## 7. The UKRN's vulnerability work

Understanding and meeting the needs of consumers in vulnerable circumstances remains a central part of the UKRN's work. The UKRN will continue to look at how research and data can improve outcomes for consumers in vulnerable circumstances, with a focus on the use and sharing of data.

### **Embedding learning from our research**

The UKRN's research will be conducted and published during the first half of 2020/21, as will the results of the literature review on identifying consumers in vulnerable circumstances. The learning from this research will help to inform the potential solutions implemented by member regulators, as well as government and other organisations. The UKRN will launch the research with another event, bringing together conclusions from the research with practical examples and experience of data sharing.

### **Making better use of regulator data**

The UKRN will continue to build on the work it has been doing with members to understand how data can be better used to understand the cross-sector consumer experience. This will include continued work to identify the opportunities for and potential legal barriers to the sharing of data between regulators.

### **Engagement with industry and consumer groups**

Building on the momentum and generated by this event, the UKRN will engage with industry and consumer groups, seeking to understand what interventions work to improve outcomes and how these can be implemented across sectors.