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English for Speakers of Other Languages (ESOL)

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Vulnerability and Carbon Monoxide Allowance (VCMA) Project Eligibility Assessment (PEA)



 Fuel Poverty and Energy	Carbon Monoxide Awareness 
Supporting Priority Customer 	Services Beyond the Meter 

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Project registration table

Project summary	
Project title	ESOL
Strategic Area	Supporting Priority Customers
Funding GDN(s) The GDN(s) which register(s) the project	Northern Gas Networks (NGN)
New/Updated State whether this is a new or updated PEA (indicate as appropriate by removing the option that does not apply)	New
Collaborative VCMA Projects Specific role(s) of GDN(s) participating in a collaborative VCMA Project	N/A
Date of PEA submission This needs to be the initial date of a first project submission	June 2026
Project start and end date	1 st April 2026 – 31 st March 2027
Project location	Yorkshire
Sectors involved	Distribution Network Operator Gas Distribution Network Consumer Group Charitable Organisation Local Authority Water Supplier Telecommunications Provider Other (specify)
Project contact	
Name	Laura Ratcliffe
Contact details	vcma@northerngas.co.uk
Project partners and third parties involved	
Organisation name	Role
Groundwork Yorkshire	Lead project partner
Costs and funding	
Total cost (£k)	£17,568
Total VCMA funding required (£k)	£17,568

Total BAU vulnerability and CO safety activity baseline allowance funding by activity (£k)	£0
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Problem(s)

Many households across Yorkshire for whom English is not a first language—particularly asylum seekers, refugees and people from ethnic minority communities—face significant barriers to understanding and managing their energy use, bills and safety risks. Language barriers, low confidence engaging with suppliers, limited access to trusted advice, and unfamiliarity with the UK energy system mean these households are disproportionately vulnerable to fuel poverty, unsafe energy practices and missed entitlements to support.

Mainstream energy advice and communication channels are often inaccessible to these communities, relying on complex language, written materials and digital engagement that do not reflect varying levels of English comprehension or literacy. As a result, critical information relating to energy efficiency, damp and mould prevention, billing and metering, Priority Services Register (PSR) eligibility and Carbon Monoxide (CO) safety is not consistently understood or acted upon. This can lead to higher household energy costs, increased health risks, unsafe living conditions and reduced resilience during periods of financial or personal vulnerability.

Asylum seekers and refugees are particularly affected, as they may experience additional challenges including housing insecurity, limited autonomy over heating systems, social isolation and restricted access to informal translation support. Without tailored, culturally sensitive and language-appropriate interventions, these households remain at risk of exclusion from essential energy support services and safety messaging.

There is a clear and ongoing need for trusted, face-to-face, accessible energy advice that is embedded within existing English for Speakers of Other Languages (**ESOL**) and community settings, delivered in a way that reflects participants' language needs and lived experiences. Without continued provision of this specialist support into GD3, vulnerable non-English-speaking households across Yorkshire are likely to remain underserved, exacerbating fuel poverty, widening inequalities and increasing the risk of preventable harm linked to unsafe energy use and Carbon Monoxide exposure.

Scope and objectives

This project will extend Groundwork Yorkshire's ESOL energy advice programme into GD3, continuing to deliver targeted, accessible energy awareness and safety advice to people for whom English is not a first language. The project focuses on supporting some of the most vulnerable and hardest-to-reach communities, including asylum seekers, refugees and ethnic minority households across Yorkshire, who often face multiple barriers to accessing mainstream energy advice and support.

The project will deliver 2-hour, in-person ESOL energy advice sessions, embedded within existing ESOL classes and community settings. Sessions will be designed to accommodate mixed-ability groups with differing levels of English comprehension and will use a highly visual, practical and interactive approach. Information will be communicated using simple language, visual explanations,

demonstrations and real-life examples, supported by an ‘easy-to-read’ handout of key terms to reinforce learning and aid understanding.

The ESOL sessions will cover a wide range of essential energy-related topics, including:

- Understanding energy suppliers, billing and metering
- Practical energy and water efficiency advice to reduce household costs
- Damp, mould and condensation awareness and prevention
- How and where to access further energy, welfare and support services
- Raising awareness of the Priority Services Register (PSR) and how to register
- Carbon Monoxide (CO) safety, including sources, risks, health impacts and prevention

As with all Green Doctor interventions, Carbon Monoxide awareness will be fully embedded throughout delivery, ensuring participants understand CO risks, how to recognise symptoms, and how to reduce exposure through safe behaviours and appropriate safety measures. PSR awareness will also be consistently promoted, ensuring participants understand the additional support available to them from energy suppliers if they are in a vulnerable situation.

To further embed learning and maximise impact, participants will be offered a follow-up session facilitated by the ESOL class tutor or project facilitator. This session will revisit key messages from the original workshop, helping participants to consolidate knowledge, ask follow-up questions and expand their English vocabulary in a practical, real-world energy context. This dual-session approach supports both improved energy understanding and wider language development, increasing confidence and long-term behaviour change.

Recognising the significant language barriers faced by many participants—particularly within asylum seeker and refugee communities—the project includes funding for professional interpreters and translators where required. While Groundwork Yorkshire will always first explore informal translation support from household members, neighbours, friends or relatives, this is not always appropriate or possible. Interpreter provision ensures accurate, inclusive and safe communication, enabling participants to fully engage with the sessions and understand critical messages around energy safety, CO risk and support entitlements.

The objectives:

- To increase awareness and understanding of the Priority Services Register
- To engage and support a minimum of 360 individuals (based on an average of 15 participants per session) from migrant, refugee, asylum seeker and ethnic minority communities who are at increased risk of fuel poverty and energy-related vulnerability
- To improve awareness of carbon monoxide risks and safety among at least 360 ESOL learners per annum

- To overcome language and communication barriers by delivering sessions using visual materials, simple text, ‘easy-to-read’ handouts and, where required, professional interpreters or translators to ensure inclusive and effective engagement
- To reinforce learning and build confidence through follow-up activity that supports vocabulary development and embeds key energy and safety messages delivered during the sessions
- To ensure hard-to-reach communities are connected to further support, including referral pathways to energy advice, welfare support and Green Doctor services where additional, in-depth assistance is required

The key outputs include:

- Increased PSR referrals
- Increased understanding of CO risks and safety among the ESOL learners

Project design engagement

Targeting vulnerability support:

Northern Gas Networks (NGN) identified the vulnerability need addressed by this VCMA project through a combination of consumer research, stakeholder insight, delivery partner intelligence and learning from previous VCMA-funded interventions targeting hard-to-reach consumers.

NGN’s consumer vulnerability data and wider industry evidence consistently highlight that people for whom English is not a first language—particularly asylum seekers, refugees and ethnic minority households—experience disproportionately high levels of fuel poverty, energy-related safety risk and exclusion from mainstream advice and support services. Language barriers, low confidence engaging with suppliers, limited understanding of the UK energy system and reduced access to trusted information increase the likelihood that these households will miss critical safety messaging, including Carbon Monoxide (CO) awareness, and remain unaware of additional protections such as the Priority Services Register (PSR).

Stakeholder engagement and delivery partner feedback have reinforced that these consumers are significantly under-represented within traditional energy advice channels and are less likely to engage with digital or written communications. Groundwork Yorkshire’s long-running Green Doctor ESOL delivery has provided direct, practical evidence of unmet need, demonstrating that standard energy advice approaches are not accessible to many ESOL learners and that tailored, face-to-face interventions embedded within trusted community and education settings are required to overcome these barriers.

NGN has also drawn on learning from previous VCMA projects and internal vulnerability forums, including cross-sector discussions with local authorities, third-sector organisations and community groups, which have identified migrant and refugee communities as priority groups at heightened risk of unsafe energy use, damp and mould exposure, financial hardship and CO harm. The continuation

of this project into GD3 ensures that this evidenced vulnerability need continues to be addressed in a preventative, inclusive and targeted manner, rather than relying on reactive or crisis-led support.

Evidence of stakeholder and/or customer support:

The development of the ESOL energy advice project has been informed by extensive stakeholder and customer engagement, building on several years of delivery experience and partnership working.

Groundwork Yorkshire has established long-standing relationships with ESOL providers, further education colleges and community organisations across Yorkshire, including those supporting asylum seekers, refugees and ethnic minority communities. Feedback from ESOL tutors and community partners has consistently highlighted strong demand for energy advice that is delivered in a format aligned to ESOL learning, using visual, practical and interactive methods rather than written-heavy materials.

Customer insight gathered through previous ESOL sessions and Green Doctor referrals has demonstrated high levels of engagement, positive learning outcomes and strong word-of-mouth promotion within communities that are otherwise difficult to reach. Participants have reported increased confidence in understanding energy bills, improved awareness of CO risks and greater understanding of how to access further support, including PSR registration. This feedback has directly supported the case for extending the project into GD3 and continuing VCMA funding.

Stakeholder project design input:

NGN stakeholders, including internal vulnerability and social strategy teams, have supported the continuation of the project based on its clear alignment with VCMA objectives, its preventative focus, and its ability to reach consumers who are least likely to benefit from business-as-usual activity. Engagement through internal meetings and proposal review processes has reinforced the value of maintaining continuity of delivery, materials and trusted relationships into GD3 rather than redesigning or re-procuring an alternative model.

CIVS workshop feedback has reinforced the importance of inclusive communication, trusted intermediaries and place-based, community delivery models to reach consumers who are least likely to engage with traditional or digital advice channels. CIVS learning highlights that vulnerability is often intersectional and dynamic, with language barriers frequently compounding other factors such as low income, insecure housing, poor health and limited digital access. This aligns directly with the needs observed within ESOL learner cohorts supported by Groundwork Yorkshire.

The inclusion of professional interpreter and translation provision reflects stakeholder concerns that informal translation is not always appropriate, accurate or available—particularly when discussing safety-critical issues such as CO risk, housing conditions or financial vulnerability. This aligns with NGN's Vulnerability Strategy commitment to fair, inclusive and safe access to information, ensuring consumers can make informed decisions and understand their entitlements.

Why the project is being funded through the VCMA

This project is being funded through the Vulnerability and Carbon Monoxide Allowance (VCMA) because it delivers targeted, preventative support to consumers who are demonstrably vulnerable and unlikely to benefit from business-as-usual energy advice or safety activity.

People for whom English is not a first language—particularly asylum seekers, refugees and some ethnic minority households—experience heightened vulnerability due to language barriers, social isolation and limited understanding of the UK energy system. Evidence from Groundwork Yorkshire’s Green Doctor ESOL delivery shows that these consumers face significant challenges in understanding energy bills, supplier communications, safety risks and available support, including the Priority Services Register (PSR) and Carbon Monoxide (CO) safety messaging. As a result, they are at increased risk of fuel poverty, unsafe energy use and preventable harm.

The project directly aligns with VCMA objectives by supporting consumers with characteristics of vulnerability and addressing risks that cannot be effectively mitigated through standard gas distribution network communications or supplier-led activity. Mainstream energy advice services typically rely on written, digital or telephone-based engagement, which evidence shows is not accessible to many ESOL learners. Without VCMA funding, these consumers would remain underserved, as the tailored delivery model—including face-to-face sessions, visual resources, easy-to-read materials and interpreter support—falls outside of business-as-usual provision.

Carbon Monoxide awareness is a core and embedded element of the project, aligning directly with VCMA’s safety objectives. ESOL learners may be less familiar with gas appliances, CO risks and UK safety standards, increasing the importance of clear, accessible and repeated safety messaging. By embedding CO awareness throughout all sessions and reinforcing it through practical examples and follow-up learning, the project delivers preventative safety benefits to consumers who are otherwise at elevated risk and unlikely to receive this information through traditional channels.

VCMA funding also enables the project to raise awareness of, and support access to, the Priority Services Register. Evidence from delivery shows that many ESOL participants are unaware of PSR eligibility or the additional protections it offers. The project addresses this gap by providing tailored explanations and support in a trusted setting, helping ensure that vulnerable consumers are better protected and supported during periods of need, including supply interruptions or safety incidents.

VCMA funding therefore represents the most appropriate and effective mechanism to deliver this intervention and ensure that vulnerable ESOL communities across Yorkshire receive accessible, preventative and safety-focused energy support.

How VCMA funding complements or supplements BAU activities

This project will be delivered alongside a BAU vulnerability activity (PSR awareness and education) and CO safety activities (raising awareness / education). However, other activities such as energy

advice provision, benefits advice, debt advice and income maximisation discussions, which are wholly VCMA funded, will complement the BAU activities undertaken.

For individual GDN VCMA Projects:

Justification for why the project should not be collaborative

This project is not designed as a collaborative cross-GDN initiative as it is to specifically address the unique vulnerability profile, local geography, and service gaps present within the Yorkshire district of the NGN network area by a Yorkshire based organisation. These characteristics mean that the project is most appropriately delivered as an individual NGN VCMA project, rather than a collaborative initiative with other Gas Distribution Networks (GDNs).

Outcomes, associated actions and success criteria

Groundwork Yorkshire and NGN will carry out monthly reporting reviews on measurable outcomes against targets to ensure successful delivery. Quarterly reviews will provide the opportunity for more in-depth analysis and the ability to highlight insights and learnings to share, as well as identify any risks and requirement for any associated actions to mitigate these.

Key outcomes expected from this project:

Outcome	Annual Target
24 sessions delivered with an average of 15 people per session = 360 people	24 ESOL sessions

Success Criteria

The success of the project will be evaluated using a combination of quantitative output data and qualitative partner feedback. Delivery against agreed targets will be monitored through regular reporting from Groundwork Yorkshire, with interim reviews conducted at key milestones to ensure progress remains on track.

The project will be deemed successful if:

- All output targets achieved (PSR, CO, referrals, benefit checks).
- Verified income gains and improved financial resilience for customers.
- Demonstrated increase in CO safety awareness through questionnaires and feedback.
- Positive SROI and NPV confirmed through financial modelling.
- Case studies showing improvements in wellbeing, safety, and overall stability.

Potential for new learning

Feedback will be invited from partners and insights from monthly and quarterly reports will also feed into any lessons learnt. Learning will also be gathered through a specific partner network call with all of the VCMA partners. Learning will be further disseminated through quarterly Customers in Vulnerable Situations Workshops and associated reports and other engagement channels such as through VCMA collaboration groups. Learning will also be shared with other utilities on Infrastructure North and Utilities Together meetings. Learning can also be shared at open days, annual reports and the annual VCMA showcase event. Learning from projects can also be shared at NEA's annual conference.

Aligning with and supporting wider vulnerability approaches

This project aligns closely with approaches to vulnerability taken across the wider energy industry, consumer organisations and public bodies by addressing structural barriers that prevent some consumers from accessing energy advice, safety information and support services.

The Groundwork Yorkshire ESOL project directly responds to this by targeting consumers whose vulnerability arises primarily from communication and access barriers rather than a single, easily identifiable characteristic.

Mainstream supplier-led and advice-sector provision typically relies on written communications, digital channels or telephone engagement. Evidence from Groundwork Yorkshire's ESOL delivery demonstrates that these approaches do not effectively reach many asylum seekers, refugees and ESOL learners, who may have limited literacy in English, low digital access or low confidence engaging with formal systems. This project therefore fills a clear gap in vulnerability support provision by delivering face-to-face, language-appropriate, preventative advice in trusted community and education settings.

The project complements the work of other utilities and consumer organisations by acting as an early-intervention and engagement mechanism rather than duplicating crisis-led or enforcement-based support. By improving understanding of energy bills, safe appliance use, damp and mould prevention, Carbon Monoxide (CO) risk and Priority Services Register (PSR) eligibility, the project helps consumers to engage more effectively with suppliers, landlords and advice services before issues escalate. This aligns with wider industry objectives to reduce harm, prevent unsafe behaviours and improve consumer resilience.

The project also aligns with local and national government priorities relating to:

- reducing health inequalities linked to poor housing conditions,
- improving energy affordability and financial resilience,
- supporting migrant, refugee and asylum-seeking communities, and
- promoting early, preventative public health and safety interventions.

Local authorities and third-sector organisations frequently rely on community-based partners such as Groundwork Yorkshire to engage communities that statutory services struggle to reach. By embedding energy advice within existing ESOL provision, the project supports these wider systems without duplicating statutory responsibilities, reinforcing a joined-up approach to vulnerability.

Importantly, the project demonstrates innovation through delivery model design, rather than technology alone. The use of ESOL-embedded sessions, visual and easy-to-read materials, follow-up learning and funded interpreter provision reflects best practice in inclusive communication and responds directly to gaps identified through prior delivery and stakeholder feedback. This approach goes beyond translation of materials and instead adapts both content and delivery to the needs of participants—an approach increasingly advocated across the energy and consumer sectors but not routinely funded through business-as-usual activity.

Monitoring and evaluation

NGN will work closely with Groundwork Yorkshire CA to monitor delivery, measure impact, and evaluate the effectiveness of the project throughout the 12-month delivery period. Monitoring arrangements are designed to ensure activities are delivered as planned, targets are achieved, and support is reaching those who need it most.

- Quarterly reports
- Financial monitoring
- Quality assurance checks through ongoing partner communication and review of supporting evidence.
- SROI and impact evaluation, using data gathered throughout delivery to assess social value in line with VCMA governance expectations.

Scale of VCMA project and SROI calculations, including NPV

NGN have applied the Industry Standard Social Value Framework and GDN Rulebook, developed collaboratively, to assess the financial and wellbeing outcomes associated with the project, ensuring consistency and comparability across networks.

Based on forecast outcomes and costs, the project is expected to deliver a Social Return on Investment (SROI) of £4.23 for every £1 invested, demonstrating that the scale of investment is proportionate to the benefits delivered for customers across participating in our network.

Social value measurement

Total cost*	£17,568
Total gross present value	£92,571.12
Net Present Value (NPV)	£74,857.92
SROI	£4.23

*Accounting for inflationary factors over the term of the project.

Internal governance and project management evidence

All VCMA project proposals submitted to Northern Gas Networks are subject to a robust internal review and assurance process to ensure strategic alignment, value for money, and compliance with VCMA eligibility criteria.

Where a proposal meets this required criteria, a Social Return on Investment (SROI) calculation is undertaken in line with NGN’s approved methodology to evidence a positive social impact and value for consumers funding the VCMA programme.

They are then sent to an external governance panel for an independent scrutiny. The panel meets quarterly and consists of sector specialists with a good understanding of VCMA. This ensures the project aligns with NGN’s Customers in Vulnerable Situations objectives and delivers meaningful outcomes for households at risk of fuel poverty and vulnerability.

Following approval, the project is managed and overseen by VCMA Project Coordinators at NGN. Ongoing delivery is monitored through a structured performance management framework, which includes:

- Submission of quarterly monitoring reports by the partner organisation, detailing activity, outputs, outcomes, and progress against agreed targets.
- Regular one-to-one meetings between NGN and the project partner to review delivery, address any challenges, and provide ongoing support and assurance, including any risks on delivery and associated mitigation.
- Participation in regular NGN partner network calls, enabling partners to share best practice, learning, and innovative approaches, while supporting continuous improvement across the network.

This approach ensures strong governance, effective delivery oversight, and continuous learning, while maintaining alignment with NGN’s wider VCMA objectives of delivering positive and measurable social impact for customers and communities.

Initial:

Approver (Name and Role)	Date
Eileen Brown, Customer Experience Director	April 2026

Eligibility Criteria

Eligibility Criteria	Description	Project qualifies Yes / No
Positive SROI	Have a positive, or a forecasted positive, Social Return on Investment (SROI) calculated in accordance with a model which the GDNs have developed and submitted to Ofgem including for the gas consumers funding the VCMA Project	Yes
Positive NPV	Have a positive, or a forecasted positive Net Present Value (NPV)	Yes
Support Criteria	Either: <ol style="list-style-type: none"> i. provide support to consumers in Vulnerable Situations and relate to Energy Safeguarding, or ii. provide support for those most at risk of being left behind in the transition to net zero, or iii. provide awareness of, and education on, the dangers of CO beyond the activities funded as business as usual (BAU) through baseline allowances, or iv. reduce the risk of harm caused by CO 	Yes
Defined Outcomes	Have specific, measurable, and time-bound outcomes which align with relevant Consumer Vulnerability Strategy objectives to achieve the requirements set out in paragraph b;	Yes
Beyond Other Funding	Go beyond activities that are funded through other price control mechanism(s), including baseline allowance funding, or required through licence obligations	Yes
Support or Align	Support or align with approaches to vulnerability taken by the wider energy industry, other utilities and/or consumer organisations, and local, national and devolved government, or evidence innovation or a gap in vulnerability support provision;	Yes
No Other External Funding	Not be delivered through other external funding sources directly accessed by a GDN, including through other government (national, devolved or local) funding	Yes
BAU vulnerability and CO safety activities	Where a GDN's BAU vulnerability and CO safety activities are funded through baseline allowances, these are not suitable for funding through the VCMA. The GDN is permitted to use VCMA funds to supplement or complement its BAU activities, however, it must ensure that its reporting provides sufficient evidence to prevent double funding.	Yes

Eligibility criteria for company specific essential gas appliance servicing

Eligibility Criteria	Description	Project qualifies Yes / No or N/A
Servicing must meet the following criteria:	<p>Either:</p> <ul style="list-style-type: none"> i. A GDN has had to isolate and condemn an essential gas appliance following a supply interruption or as part of its emergency service role; or ii. A GDN or its Project Partner has identified an essential gas appliance which has not been serviced in the last 12 months in the owner-occupied home of a customer in a Vulnerable Situation where an occupier of the property suffers from a permanent or temporary health condition¹² that makes them more vulnerable to health risks associated with cold homes; or iii. A GDN or its Project Partner has identified an essential gas appliance which has not been serviced in the last 12 months in a tenant-occupied home of a customer in a Vulnerable Situation where it is the tenant's responsibility to maintain the essential gas appliance, where an occupier of the property suffers from a permanent or temporary health condition that makes them more vulnerable to health risks associated with cold homes 	N/A
Affordability	The household cannot afford to service the essential gas appliance, as assessed against the affordability criteria set out in the VCMA governance document	N/A
Funding	Sufficient funding is not available from other sources (including a social or private landlord and national, devolved, or local government funding) to fund the essential gas appliance servicing	N/A

Eligibility criteria for company specific essential gas appliance repair and replacement

Eligibility Criteria	Description	Project qualifies Yes / No or N/A
Unsafe pipework and essential gas appliance repair or replacement must meet the following criteria:	Either: <ul style="list-style-type: none"> i. GDN has had to isolate and condemn unsafe pipework or an essential gas appliance following a supply interruption or as part of its emergency service role; or ii. ii. iii. A GDN or its Project Partner has had to condemn unsafe pipework, or an essential gas appliance, following an essential gas appliance service (as described in 3.19 of the VCMA governance document) 	N/A
Health condition	Either: <ul style="list-style-type: none"> i. The occupier of the property suffers from a permanent or temporary health condition that makes them more vulnerable to health risks associated with cold homes and has a household income of £31,000 or below in 2025/26 prices, adjusted for inflation using Consumer Price Index with Housing costs (CPIH) 13, or ii. the household cannot afford to service the essential gas appliance, as assessed against the affordability criteria set out in Appendix 1 of the VCMA governance document 	N/A
Funding	Sufficient funding is not available from other sources (including national, devolved, or local government funding) to fund the unsafe pipework or the essential gas appliance repair or replacement.	N/A