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PEA reference: V.PC1.53.A1.056.027.Re.N

Advice in BSL to Deaf Community

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



 <p>Fuel Poverty and Energy</p>	<p>Carbon Monoxide Awareness</p> 
<p>Supporting Priority Customer</p> 	<p>Services Beyond the Meter</p> 

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Project registration table

Project summary	
Project title	Advice in BSL to Deaf Community
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	Cross Utility collaboration
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 2028
Project location	NGN Region
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
Citizen's Advice Sheffield	Lead project partner
Costs and funding	
Total cost (£k)	£275,000
Total VCMA funding required (£k)	£275,000

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

Deaf and hard-of-hearing people who use British Sign Language (BSL) face persistent and systemic barriers when attempting to access mainstream advice services. These barriers are primarily rooted in communication inequality, including limited availability of qualified BSL interpreters, low levels of Deaf awareness within services, and advice delivery models that are not designed around Deaf culture or language. As a result, Deaf BSL users are disproportionately excluded from timely, effective support across critical areas such as welfare benefits, energy and fuel poverty, debt, housing, and immigration.

Mainstream advice provision frequently relies on written English, telephone access, or interpreter-mediated communication. For many Deaf BSL users, this creates significant obstacles, as BSL is a distinct language with its own grammar and structure and is not directly equivalent to written or spoken English. Interpreter-based models also introduce delays, increase the risk of miscommunication, and can undermine trust and engagement—particularly when discussing complex or sensitive issues such as financial hardship, debt, or housing insecurity.

Scope and objectives

The Citizens Advice Sheffield (CA Sheffield) Deaf Advice Service exists to address this gap by delivering fully accessible, culturally competent advice directly in BSL. The service is uniquely designed and delivered, employing several profoundly Deaf advisers with lived experience of the barriers faced by the Deaf community. This approach removes reliance on interpreters and ensures advice is trusted, accurate, and accessible from the outset.

Demand for the Deaf Advice Service is both high and growing. In the most recent delivery year, the service supported 155 unique Deaf clients, addressing 675 individual advice issues and undertaking 1,602 advice activities. The service also secured £124,725 in previously unclaimed benefits, highlighting both the scale of unmet need and the significant financial disadvantage experienced by Deaf households.

Deaf clients typically present with multiple, interlinked issues—on average four distinct advice needs per client—including welfare benefits, energy affordability, debt, and housing. Each issue requires a substantial level of adviser input, with an average of six hours per issue, reflecting both case complexity and the time required to deliver advice in a fully accessible, BSL-based format. This evidences not only the intensity of need but also the additional resource required to deliver equitable outcomes for Deaf clients.

Without continued funding into GD3, there is a significant risk that Deaf people within the NGN region will lose access to a specialist, trusted service that is not replicated elsewhere in the advice sector. The loss of this service would result in increased exclusion from essential advice, reduced income maximisation, heightened risk of fuel poverty, and greater likelihood of issues escalating to crisis point—placing additional pressure on statutory services and the wider voluntary sector.

Extending the Deaf Advice Service into GD3 is therefore critical to ensuring continuity, stability, and resilience for a highly vulnerable and underserved community. The extension will enable the service to maintain specialist Deaf adviser capacity, continue delivering advice exclusively in BSL, and respond effectively to increasing demand and growing case complexity. Crucially, it will support early intervention through energy and welfare advice, preventing financial hardship from escalating and reducing longer-term costs to public and third-sector services.

This project directly aligns with GD3 objectives by targeting those least able to access mainstream provision and delivering preventative, person-centred support that addresses vulnerability at its root. By sustaining a proven, specialist model of delivery, the project ensures that Deaf BSL users are not left behind and are able to access the same opportunities for financial resilience, safety, and wellbeing as the wider population.

The Deaf Advice Service provides holistic advice across a wide range of issues including welfare benefits, energy and fuel poverty, debt, housing, immigration, and other specialist areas. Where issues fall outside the service's remit, warm, supported referrals are made to specialist services such as Immigration, Debt, and Housing teams, ensuring Deaf clients are not excluded at any point in their advice journey.

By employing Deaf advisers with lived experience, the service removes reliance on interpreters, reduces miscommunication, and significantly improves client engagement and outcomes. This model has been shown to be preferred by Deaf clients and is critical to the service's success.

The objectives:

To increase awareness and understanding of the Priority Services Register within the Deaf community

To support a minimum of 100 Deaf and hard-of-hearing individuals per annum to successfully register on the Priority Services Register by providing one-to-one, face-to-face assistance in British Sign Language

To improve awareness of carbon monoxide risks and safety among at least 400 Deaf community members per annum

To provide specialist energy advice and income maximisation support in British Sign Language to a minimum of 270 Deaf and hard-of-hearing clients per annum

To secure at least £125,000 per annum in previously unclaimed benefits for Deaf and hard-of-hearing clients through accurate benefit entitlement checks and ongoing casework delivered in BSL, increasing household income and reducing financial vulnerability within the Deaf community

The key outputs include:

Increased PSR referrals

Increased understanding of CO risks and safety among the deaf community

- Reduced financial vulnerability through income maximisation

Project design engagement

Targeting vulnerability support:

The vulnerability need addressed through this VCMA project was identified by NGN through a combination of consumer research, long-standing delivery data, stakeholder intelligence, and sector-wide evidence on communication inequality experienced by Deaf BSL users.

Deaf people who use British Sign Language experience persistent barriers to accessing essential services, including energy, welfare, and legal advice. National evidence highlights that there are significantly fewer qualified BSL interpreters than required to meet demand, resulting in delays, exclusion, and reduced quality of support for Deaf consumers. Research undertaken with the Deaf community, including National Lottery-funded engagement work referenced by CA Sheffield, found a strong preference for advice delivered directly in BSL by trained advisers, rather than through interpreters, due to improved accuracy, trust, and engagement.

From a delivery and data perspective, the Deaf Advice Service's operational data demonstrates both high levels of vulnerability and complexity. In the most recent delivery year, the service supported 155 unique Deaf clients, addressing 675 advice issues and undertaking 1,602 advice activities, with each client presenting on average with four inter-related issues requiring intensive adviser input. A significant proportion of these issues relate directly to energy affordability, fuel poverty, welfare benefits, and debt, all of which are recognised vulnerability drivers within GDN frameworks.

Stakeholder intelligence gathered by NGN through VCMA delivery, CIVS workshops, and ongoing collaboration with Citizens Advice partners has consistently identified Deaf BSL users as a group least able to access mainstream provision, particularly where services rely on telephone contact, written English, or digital self-service routes. The extension of this project into GD3 therefore targets a clearly evidenced vulnerability need, ensuring that Deaf consumers are not excluded from preventative, early-intervention energy and welfare support.

Evidence of stakeholder and/or customer support:

The development of this VCMA project is underpinned by extensive stakeholder and customer engagement, both historically and through ongoing delivery.

CA Sheffield has worked with the Deaf community for over 30 years, with the Deaf Advice Service originally established by Deaf people for Deaf people. Continuous engagement with Deaf clients has shaped the service model, with feedback consistently demonstrating a strong preference for advice delivered directly in BSL by Deaf or BSL-fluent advisers rather than interpreter-mediated provision.

This VCMA project directly aligns with Northern Gas Networks' (NGN) GD3 Vulnerability Strategy, which emphasises a vulnerability-first approach, the importance of intersectionality, and the need to scale up successful, evidence-based projects delivered through trusted partners.

NGN's GD3 Vulnerability Strategy explicitly recognises that vulnerability is often driven by overlapping and compounding factors, including disability, communication barriers, low income, poor health, and difficulty accessing essential services. Deaf BSL users experience these factors acutely, particularly where mainstream systems are not designed to accommodate non-spoken language users. The Deaf Advice Service directly responds to this by delivering tailored, accessible support that addresses financial hardship, energy affordability, and safety risks, in line with NGN's strategic priority to better understand and respond to complex vulnerability.

Stakeholder project design input:

Stakeholder priorities identified through NGN's Customers in Vulnerable Situations (CIVS) engagement programme further reinforce the relevance of this project. Feedback from the CIVS Annual Strategic Workshop (May 2025) and subsequent quarterly CIVS workshops identified seldom-heard groups, digital exclusion, and barriers to accessing support services as ongoing areas requiring targeted intervention. Stakeholders emphasised the need for trusted, community-based delivery models that are able to engage groups who are least likely to access standard channels.

The transition-to-GD3 sessions within CIVS workshops highlighted the importance of maintaining continuity for effective VCMA projects and ensuring that learning from GD2 delivery informs future investment. Deaf BSL users were consistently recognised within stakeholder discussions as a group at risk of exclusion where services rely on telephone contact, written English, or digital self-service routes. The Deaf Advice Service addresses this gap by offering face-to-face and accessible digital advice in BSL, supporting NGN's commitment to inclusive engagement and equitable outcomes.

More recent CIVS engagement during GD3 planning has also reinforced NGN's focus on health impacts, energy affordability, and carbon monoxide awareness, particularly for customers experiencing disability or communication barriers. The inclusion of accessible carbon monoxide safety advice within this project directly reflects these priorities and supports NGN's wider ambition to keep communities safe and warm, while reducing avoidable harm and escalation.

Why the project is being funded through the VCMA

This project is being funded through the Vulnerability and Carbon Monoxide Allowance (VCMA) as it meets the eligibility criteria set out by Ofgem and directly supports Northern Gas Networks' (NGN) GD3 Vulnerability Strategy by delivering targeted, preventative support to customers in vulnerable situations who are least able to access mainstream provision.

The Deaf Advice Service addresses clear and evidenced vulnerability drivers, including disability, communication barriers, low income, fuel poverty risk, and difficulty accessing essential services. Deaf BSL users are widely recognised as a group at risk of exclusion from standard advice and energy safeguarding services, particularly where support relies on telephone contact, written English, or digital self-service routes. These barriers significantly increase the risk of unmanaged energy debt,

under-claimed benefits, unsafe energy use, and adverse health outcomes, all of which fall within the scope of VCMA-eligible activity.

NGN's GD3 Vulnerability Strategy explicitly identifies the need to take a vulnerability-first approach, recognising that vulnerability is often intersectional and compounded by factors such as disability, financial hardship, and health inequality. The strategy also prioritises:

Increasing access to support for customers least able to engage with mainstream services

Scaling up successful, evidence-based projects delivered by trusted partners

Supporting early intervention to prevent escalation of risk and harm

The Deaf Advice Service directly delivers against these priorities. It provides fully accessible advice in British Sign Language, delivered by profoundly Deaf advisers with lived experience, removing reliance on interpreters and addressing a structural barrier that would otherwise prevent Deaf customers from accessing support. This model has been shown through delivery data and consumer research to significantly improve engagement, trust, and outcomes for Deaf clients.

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 currently being delivered as an individual NGN VCMA initiative rather than a collaborative GDN project due to the unique offering provided by CA Sheffield being trialled and extended within the NGN network area. The intention is to widen out the delivery across other GDNs networks within GD3 but this needs to be at a pace determined by CA Sheffield as it is a specialist service with a limited number of advisors.

Outcomes, associated actions and success criteria

Citizens Advice Sheffield 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
Raising awareness of the PSR, through targeted marketing and face to face sessions for the Deaf community	400
PSR Registrations-We will assist individuals with completion of their registrations on a face-to-face basis using BSL	100
Raising awareness of Carbon Monoxide Poisoning-We will hold workshops with the Deaf Community to highlight the issues, we will produce BSL videos and share on our social media pages	400
Energy Advice and Income Maximisation to Deaf and Hard of Hearing customers-Advice in BSL, bespoke referrals to other areas of Law	270
Amount secured in unclaimed benefits	£125,000

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 CA Sheffield, 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 wider approaches to vulnerability adopted across the energy industry, other utilities, consumer organisations, and public policy, while also addressing a clearly evidenced gap in the provision of accessible vulnerability support for Deaf BSL users.

Across the energy sector, there is increasing recognition that vulnerability is multi-dimensional and intersectional, driven not only by income or health but also by disability, communication barriers, and exclusion from services. NGN's GD3 Vulnerability Strategy reflects this shift, emphasising the need to understand individual and structural drivers of vulnerability and to support customers who are least able to engage with standard systems. The Deaf Advice Service directly supports this approach by addressing communication inequality as a root cause of vulnerability, rather than treating it as a secondary access issue.

This approach is consistent with learning shared across GDNs, DNOs, and water companies through VCMA governance groups and cross-utility engagement, where stakeholders have highlighted that traditional service models—telephone-based contact, written correspondence, and digital self-service—systematically exclude certain customer groups. Deaf BSL users are frequently cited as a group for whom reasonable adjustments are insufficient, and where bespoke, language-appropriate provision is required rather than minor adaptations to mainstream services.

The project also aligns with the work of consumer organisations such as Citizens Advice, which has long identified Deaf BSL users as experiencing disproportionate difficulty accessing advice, welfare support, and energy safeguarding services. National and local Citizens Advice evidence demonstrates that Deaf clients often present later, with more complex issues, because earlier access to advice has been blocked by communication barriers. By providing holistic advice in BSL, this project complements the wider Citizens Advice network and ensures Deaf clients are not excluded from its core mission of early intervention and financial resilience.

Monitoring and evaluation

NGN will work closely with Sheffield CA to monitor delivery, measure impact, and evaluate the effectiveness of the project throughout the 24-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 £9.05 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*	£275,000
Total gross present value	£2,669,709.69
Net Present Value (NPV)	£2,404,031.18
SROI	£9.05

*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:	Either: <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
<p>Unsafe pipework and essential gas appliance repair or replacement must meet the following criteria:</p>	<p>Either:</p> <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) 	<p>N/A</p>
<p>Health condition</p>	<p>Either:</p> <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 	<p>N/A</p>
<p>Funding</p>	<p>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.</p>	<p>N/A</p>