Summary of Retail Brands' self-assessments of alignment with the Consumer Care Guidelines

1 June 2023

Executive Summary

This is a summary of electricity retail brands' self-reported alignment with the Consumer Care Guidelines[1] (the Guidelines) for FY 2021/22 (the Alignment Review), their first year of operation. The Guidelines are designed to protect the interests of electricity consumers, with a particular emphasis on the needs of medically dependent consumers (MDCs). The Guidelines were developed in close collaboration with electricity retailers. Currently, alignment with the Guidelines is voluntary. Nonetheless, according to the Guidelines Decision paper (the Decision paper) released in March 2021,[2] retailers were expected to fully align with the Guidelines by 31 December 2021.

The Guidelines were developed following the Electricity Price Review in 2019, which called for greater protections for vulnerable and medically dependent consumers. This was prior to the passage of the Electricity Industry Amendment Act 2022, which introduced an additional objective[3] for the Electricity Authority (the Authority), to protect the interests of domestic and small business consumers in relation to the supply of electricity to those consumers.

Five of the six large retail brands stated that they were fully aligned to the Guidelines (Contact, Mercury, Trustpower, Meridian and Powershop) with Genesis reporting partial alignment. Six out of eight medium-sized retailers responded to the staff's request to provide their self-assessment of alignment with the Guidelines with four of those reporting full alignment. The remaining two of the responding medium-sized retailers reported partial alignment. 17 of the 24 small retailers provided a self-assessment, with 11 of those 17 stating full alignment and the other small retailers who responded reporting partial alignment.

Where non-alignment was reported a significant proportion of that non-alignment was reported as being with Parts 7 (Disconnection) and 8 (MDCs). These parts of the Guidelines are important for vulnerable customers and MDCs.

Some of the medium and small retail brands did not provide a self-assessment, either initially as provided in the Guidelines or in response to a follow-up email by the Authority. Their alignment to the Guidelines has not been assessed.

[1] https://www.ea.govt.nz/documents/2093/Consumer-Care-Guidelines.pdf
https://www.ea.govt.nz/documents/2204/Consumer-Care-Guidelines-Decisions-Paper.pdf
[3] The additional objective applies only to the Authority's activities in relation to the dealings of industry participants with domestic consumers and small business consumers.

1. Purpose

The purpose of this report is to summarise the findings of the electricity retailers' self-assessment exercise regarding their alignment to the Guidelines, based on retailers' first annual alignment statements (statements) for FY 2021/22.

2. Introduction

Context

2.1. In 2019, the Electricity Price Review (EPR) highlighted the need to review the "Guideline on arrangements to assist vulnerable consumers" and the "Guideline on arrangements to assist medically dependent consumers" (2009 Guidelines) as these were deemed no longer fit for purpose. The 2009 Guidelines were a consumer protection policy with a mandate to assist vulnerable and medically dependent consumers (MDCs).

2.2. Following an extensive and lengthy collaboration process with a range of stakeholders (see Annex B), the Guidelines were developed and published in March 2021. They were designed to ensure retailers provide a quality level of care for consumers, with particular emphasis on Part 7 (Disconnection) which protects the supply of electricity to vulnerable consumers and Part 8 (MDCs) which provides specific protections for MDCs. The Guidelines are voluntary, both in terms of alignment and reporting. The Authority informed retailers in the Decision Paper that it could publish scorecards and the Guidelines outline steps the Authority can take after receiving the statements, such as issuing a report setting out retailers self-reported alignment as well as details about which retailers responded.[4]

3. Scope

3.1. The scope of the Alignment Review is limited to retail brands' self-assessment of alignment to the Guidelines for the 2021/22 year,[5] as authorised by the Authority's Board in March 2021. It does not extend to whether the Guidelines are fit for purpose.

4. Relevant considerations

4.1. In the Decision paper the Authority indicated that it may initiate a process to consider mandating certain aspects of the Guidelines if retailers do not align with the purpose, principles and intended outcomes described in Part 1 of the Guidelines (to the extent consistent with the Authority's statutory objective and functions).[6] Since then, the Authority has been given an additional function and objective which explicitly directs the Authority to protect the interests of domestic consumers and small business consumers in relation to the supply of electricity to those consumers.

5. Limitations of this summary

5.1. Retail brands' stated alignment with the Guidelines is based on self-reports by those retailers to the Chief Executive of the Authority. By its nature self-reporting is subjective, and variations can emerge. In this context, self-reporting biases could be borne out of enthusiasm to show compliance or, alternatively, conservative positioning.

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[4] Part 10 paragraph 127 of the Guidelines

[5] The Guidelines also apply to distributors who directly invoice their customers. Currently, the Authority is not aware of any distributors that do this, so this review focuses solely on retail brands.

[6] Paragraph 6.5 of the Decision Paper

5.2. Also, retail brands may have varying interpretations of the Guidelines and what is an acceptable minimum standard of conduct, which would affect how they report their level of alignment.

6. Retailer market

6.1. There were 38 electricity retail brands[7] operating in New Zealand at the time that the retail brands reported their self-assessments.

6.2. For this summary, Authority staff split retail brands into groups of small, medium, and large. Small retail brands are defined as having less than 10,000 ICPs, medium retail brands as having between 10,000 and 99,999 ICPs, and large retail brands having 100,000 ICPs or more.

6.3. At the time, the market was made up of six large retail brands: Contact, Genesis, Mercury, Trustpower, Meridian, and Powershop.[8] Collectively, they have ~1.48 million residential ICPs[9] (76.5% of the market).[10]

6.4. There were eight medium-sized retail brands (Ecotricity, Electric Kiwi, Flick Electric, Frank Energy[11], Glo-Bug[12], Nova, Pulse and Vocus). These have ~415,000 residential ICPs (21% of the market).

6.5. There were 24 small retail brands, accounting for 1.4% of market ~26,000 ICPs.

7. The Guidelines

7.1. The Guidelines comprise of ten parts (see Annex A for more detail):[13]

- **Part 1: Purpose**
- **Part 2 Publish Policy**: *Retailers to publish a consumer care policy*
- **Part 3 Info Records**: *Retailers to keep information and records relating to consumer care*
- **Part 4 Contracts**: *Retailers to follow contract law when dealing with customers*
- **Part 5 Account Management**: *Retailers to maintain annual communication with customers regarding the support they can offer*
- **Part 6 Payment Difficulties**: *Retailers to assist consumers with payment difficulties*
- **Part 7 Disconnection**: *Retailers to follow the protocol in the Guidelines before disconnection of electricity supply*
- **Part 8 MDCs**: *Retailers to take specific actions when supplying electricity to MDCs (e.g., identify and record MDCs as soon as possible, and ensuring they are not disconnected for non-payment)*
- **Part 9 Fees/Bonds**: *Retailers to set reasonable fees and bonds*

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[7] Some businesses operate more than one retail brand – for example, Mercury retails under the Mercury brand and the Trustpower brand. Even where owned by the same ultimate parent, different brands can be operated entirely separately. Retail brands are therefore treated separately under this paper – and "retailer" and "retail brand" are used interchangeably.
[8] Meridian subsidiary.
[9] 'ICP' stands for 'Installation Control Point', a physical point of connection on a local or embedded network that the distributor nominates as the point at which a retailer will be deemed to supply electricity to a consumer.
[10] The five largest retail businesses (aggregating the retail brands owned by a single parent company) had ~1.6 million ICPs (83% of the market).
[11] Genesis subsidiary.
[12] Mercury subsidiary.
[13] Part 1 (Purpose) relates to the purpose of the Guidelines and is not reported upon.

- **Part 10 Disclosure Monitoring**: *Retailer obligations to report on adherence to the Guidelines for the Authority's monitoring purposes.*

7.2. Although all parts of the Guidelines are important, as previously stated there is strong interest in Part 7 (**Disconnection**) and Part 8 (**MDCs**), given the risk and implications of poor alignment with these areas.

8. Methodology

8.1. Under Part 10 paragraph 126 of the Guidelines, retailers should provide to the Authority a consumer care annual alignment statement, signed by the Chief Executive (or an equivalent) for the period 1 July 2021 to 30 June 2022. The date for retailers to provide their first annual alignment statement under the Guidelines to the Authority was 31 July 2022.

8.2. In the template statement, retail brands were asked to self-assess their alignment with the nine parts of the Guidelines above, Parts 2 -10. The possible responses were 'aligned' or 'not aligned'. There is also a section where retailers can explain the reasons for not being aligned if they stated they are not aligned with certain parts.

8.3. Only three retail brands provided their statements by 31 July 2022 as provided in the Guidelines. Authority staff sent an email to all retail brands who had not provided a self-assessment, requesting that they provide the self-assessment. The last retailer statement was received by the Authority on 13 October 2022. Some retailers never provided a statement.

8.4. This summary focusses on retail brands registered with the Authority as at 31 July 2022. Some of those brands are no longer participants.

9. Results

9.1. The results of this review are discussed in the context of retail brands' sizes (small, medium, and large), as well as in the wider context of the retail market.

Retail brands' stated alignment with the Guidelines

Overall stated alignment

9.2. Self-reported retailer stated alignment with the Guidelines was mixed. Of the 29 retail brands who provided self-assessments, 20 stated they were fully aligned with the Guidelines (67% of the ICP market / 69% of retailers / 1,305,070 ICPs). This comprised five of the six large retail brands (all of whom provided self-assessments), four of the six medium-sized retail brands who provided self-assessments (there are 8 medium sized retail brands in total), and 11 of the 17 small retail brands who provided self-assessments (there are 24 in total).

9.3. Of the nine substantive parts of the Guidelines, all retail brands which provided a self-assessment statement stated that they aligned with Part 4 (**Contracts**). This means there was some level of non-alignment with the remaining eight parts of the Guidelines.

Large retail brand alignment

9.4. Table 1 below summarises large retail brands' stated alignment with the Guidelines.
*Green denotes stated alignment; red denotes non-alignment.
** Refer to Annex C for retail brands' stated reasons for non-alignment

<table>
<tr><th colspan="7">Table 1: Large retail brand stated alignment with the Guidelines (100,000+ ICPs)*</th></tr>
<tr><th></th><th>Contact</th><th>Genesis</th><th>Mercury</th><th>Trustpower</th><th>Meridian</th><th>Powershop</th></tr>
<tr><td>% of market</td><td>20%</td><td>18%</td><td>14%</td><td>12%</td><td>7%</td><td>5.5%</td></tr>
<tr><td>Number of ICPs</td><td>381,264</td><td>349,713</td><td>270,194</td><td>235,681</td><td>136,045</td><td>104,843</td></tr>
<tr><td>Ownership</td><td rowspan="2">Contact</td><td rowspan="2">Genesis</td><td rowspan="2">Mercury</td><td rowspan="2">Mercury</td><td rowspan="2">Meridian</td><td rowspan="2">Meridian</td></tr>
<tr><td>| Part |</td></tr>
<tr><td>2 Publish Policy</td><td></td><td></td><td></td><td></td><td></td><td></td></tr>
<tr><td>3 Info/Records</td><td></td><td></td><td></td><td></td><td></td><td></td></tr>
<tr><td>4 Contracts</td><td></td><td></td><td></td><td></td><td></td><td></td></tr>
<tr><td>5 Account Management</td><td></td><td>**</td><td></td><td></td><td></td><td></td></tr>
<tr><td>6 Payment Difficulties</td><td></td><td></td><td></td><td></td><td></td><td></td></tr>
<tr><td>7 Disconnection</td><td></td><td></td><td></td><td></td><td></td><td></td></tr>
<tr><td>8 MDCs</td><td></td><td></td><td></td><td></td><td></td><td></td></tr>
<tr><td>9 Fees/Bonds</td><td></td><td></td><td></td><td></td><td></td><td></td></tr>
<tr><td>10 Disclosure & Monitoring</td><td></td><td></td><td></td><td></td><td></td><td></td></tr>
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9.5. As noted above, Genesis was the only large retail brand to report non-alignment with the Guidelines. The non-alignment related to three parts including Parts 7 (Disconnection) and 8 (MDCs).

Medium-sized retail brand alignment

9.6. Table 2 below summarises medium-sized retail brand self-assessed alignment with the Guidelines. As set out in the table below, six of the eight medium-sized retail brands returned a self-assessment.

Yellow denotes non-respondent

Table 2: Medium-sized retail brand alignment with the Guidelines (10,000 – 99,999 ICPs)								
	Frank Energy	Pulse EA	Electric Kiwi	Nova	Vocus	Flick Electric	Glo-Bug	Ecotricity
% of market	4.5%	4%	4%	3.5%	2.5%	1%	1%	0.5%
Number of ICPs	90,468	76,796	76,180	67,733	46,475	24,405	21,146	12,040
Ownership	Genesis	Indp.	Indp.	Indp.	Indp.	Indp.	Mercury	Indp.
| Part |								
2 Publish Policy								
3 Info/Records								
4 Contracts								
5 Account Management								
6 Payment Difficulties								
7 Disconnection								
8 MDCs								
9 Fees/Bonds								
10 Disclosure & Monitoring								

9.7. Four of the six medium sized retail brands who provided self-assessments stated full alignment (8.5% of the market). Two others stated that they did not align with three or four parts of the Guidelines, respectively, which is a significant proportion of the Guidelines.

9.8. As recorded above, two medium sized brands did not provide self-assessments despite the follow-up email from the Authority. The Authority therefore has no information on the level of alignment of those brands with the Guidelines, except in respect of the self-assessment provision. While the Guidelines themselves provide for self-assessment by 31 July 2022, the Authority notes that many of the brands did not provide a self-assessment until the Authority followed up.

Small retail brand alignment

Tables 3 and 4 summarise small retail brand alignment with the Guidelines. 17 of 24 small retail brands provided a self-assessment, representing about 0.63% of the market (12,504 ICPs).

Table 3: Small retailer alignment with the Guidelines (<10,000 ICPs)

	Nova Megatel	**Wise Prepay**	**For Our Good**	**Octopus Energy**	**OurPower**	**Simply Energy**	**Prime Energy**	**Hanergy**	**Paua to the People**	**Community Power**	**Kakariki Power**	**Power Edge**
% of market	0.37%	0.28%	0.22%	0.21%	0.15%	0.03%	0.02%	0.02%	0.01%	<0.01%	<0.01%	<0.01%
Number of ICPs	7,093	5,362	4,144	4,107	2,973	507	350	333	260	110	102	78
Ownership	Nova	Nova	Indp.	Octopus Group	WEL Networks	Contact	Indp.	Hanergy Group	Indp.	Indp.	MainPower	Indp.
| Part |												
2 (Publish Policy)												
3 (Info/Records)												
4 (Contracts)												
5 (Account Management)												
6 (Payment Difficulties)												
7 (Disconnection)												
8 (MDCs)												
9 (Fees/Bonds)												
10 (Disclosure & Monitoring)												

Table 4: Small retail brand alignment with the Guidelines (<10,000 ICPs)

	Sustainability Trust	South Pacific Energy	Ecosmart	Stack Energy	Liberta Systems	Tensor	AA Power	Deep Energy	Mons Ampere	Orange Services	Plains Power	Platinum Power
% of market	<0.01%	<0.01%	<0.01%	<0.01%	<0.01%	<0.01%	<0.01%	<0.01%	<0.01%	<0.01%	<0.01%	<0.01%
Number of ICPs	77	70	33	12	11	6	1	1	1	1	1	1
Ownership	Indp.	SPE Group	Indp.	Stack Power Ltd	Indp.	Indp.	Indp.	Deep Energy Ltd	Mount Ampere Holdings Ltd	Orange Business Services NZ Ltd	Contact	Indp.
| Part |												
2 (Publish Policy)												
3 (Info/Records)												
4 (Contracts)												
5 (Account Management)												
6 (Payment Difficulties)												
7 (Disconnection)												
8 (MDCs)												
9 (Fees/Bonds)												
10 (Disclosure & Monitoring)												

10. Discussion

Overall alignment

10.1. Overall, retailer alignment with the Guidelines, as self-assessed, varied. The majority of large retailers reported alignment with all the Guidelines, with only one reporting partial alignment. The majority of medium sized retailers who provided self-assessments also reported full alignment, with the other two respondents reporting partial alignment. The majority of small retail brands who provided self -assessments also reported alignment with the Guidelines, with the other respondents reporting partial alignment.

10.2. On the other hand, where non-alignment was reported a significant proportion of that non-alignment was reported as being with Parts 7 (**Disconnection**) and 8 (**MDCs**).

10.3. As noted, some medium and small retail brands have not yet provided a self-assessment. These non-respondent retailers comprise 92,903 ICPs, or 4.7% of the market.

10.4. It is possible that this group of non-respondents has aligned themselves with the Guideline's provisions, but until the Authority receives self-assessments for evaluation, the Authority cannot confirm alignment to the Guidelines (except for the self-assessment provision, which they have not aligned with).

10.5. While the Guidelines provide for the self-assessment, most brands did not provide their self-assessments until after prompting by Authority staff.

Authority expectations

10.6. The Guidelines were developed in 2020 through an intensive and collaborative process with industry and stakeholders. This was conducted via a series of well-attended workshops and webinars in October 2020 through to February 2021. During this engagement, there was robust discussion about whether the Guidelines should be mandatory or voluntary. Ultimately, it was decided that the Guidelines should be voluntary.[14] However, the Authority expressed the clear expectation[15] that retailers would fully align with the Guidelines, despite their voluntary nature. According to the Decision paper, retailers were expected to fully align with the Guidelines by 31 December 2021.

10.7. Stakeholders included representatives from electricity retailers, consumer groups, distributors, social and support agencies, academics researching energy poverty, and at times the Ministry of Health.[16] Furthermore, retailers of all sizes as well as ERANZ were very forthcoming in their praise regarding the inclusive and collaborative process of developing the Guidelines. Therefore, the consensus was that electricity retailers were well informed, well prepared, and willing to adequately align with the Guidelines expectations regardless of their voluntary nature.

10.8. As the alignment statements are a self-reporting exercise the findings are dependent on retailers providing self-assessments, only as reliable as the retailer's honesty, and dependent on how strict the standards each individual retailer applies to themselves are. Therefore, Authority staff need to commend the retailers that keep themselves accountable and were forthcoming about their non-alignment with certain aspects of the Guidelines.

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[14] It was widely agreed that the voluntary approach would allow more time for retailers to implement the processes laid out in the Guidelines and would make it easier for the Authority to implement and update than if the Guidelines were made mandatory.

[15] In s7.2(d) of the Guidelines decision paper, the Authority notes its expectation of retailers to align their practices with the Guidelines following a great deal of stakeholder collaboration during the co-development process.

[16] Refer to Annex B for a list of stakeholders involved in the Guidelines' development.

Appendix A: Outline of parts 1 – 10 of the Consumer Care Guidelines

Part 1 – Purpose

This Part aims to make sure the purpose of the consumer care guidance package, including the Guidelines, are clear.

The purpose of the consumer care guidance package is to guide retailers:

- In adopting behaviours and processes that foster positive relationships with domestic consumers; and
- In helping domestic consumers maximise their potential to access and afford a constant electricity supply suitable for their needs; and
- In helping domestic consumers minimise harm caused by insufficient access to electricity or by payment difficulties.

Part 2 – Retailers to publish a consumer care policy

This Part makes recommendations to retailers concerning a consumer care policy, website information and initial communications with customers.

Part 3 – Information and records relating to consumer care

This Part makes recommendations to retailers concerning the collection and recording of information relating to consumer care, in particular for the purpose of enabling a retailer to proactively support, as effectively as possible, any customers who may have difficulty paying their electricity bill or maintaining connection to electricity.

Part 4 – When a customer signs up or is denied a contract

This Part makes recommendations to retailers to take specific actions when a customer is signed up or a person enquiring with a retailer is denied a contract.

Part 5 – Business-as-usual account management

This Part makes recommendations to retailers to take specific actions during business-as-usual account management.

Part 6 – When payment difficulties are anticipated or arise

This Part makes recommendations to retailers to take specific actions when a customer anticipates payment difficulties, is having payment difficulties and/or is in payment arrears.

Part 7 – Progressing to disconnection for non-payment of electricity invoices and reconnection

This Part makes recommendations to retailers to take specific actions prior to, at, and following disconnection of customers for non-payment of electricity invoices including:

- To notify post-pay customers with debt relating to electricity supply or distribution services about planned disconnection, and
- In relation to disconnection and reconnection of post-pay and pre-pay customers.

This Part is relevant to all disconnections carried out for non-payment of electricity invoices regardless of the disconnection method (in-person, remote or prepayment). However, it is recommended that MDCs are not disconnected (see Part 8).

Part 8 – Additional recommendations for medically dependent consumers

This Part makes recommendations to retailers to take specific actions when supplying domestic premises where medically dependent consumers permanently or temporarily reside.

These recommendations are additional to the recommendations set out in each of the preceding Parts of these Guidelines.

This Part aims to make sure MDCs are identified and recorded as early as practicable, and to make sure MDCs are not disconnected for either non-payment of an electricity invoice, or, the customer obtaining electricity or distribution services by or involving deception.

Part 9 – Fees and bonds

This Part makes recommendations to retailers concerning fees, bonds and the setting of fees or bonds so that they reflect reasonable costs.

Part 10 – Information disclosure and monitoring

This Part makes recommendations to retailers concerning information disclosure to enable better monitoring of alignment and outcomes.

Industry Stakeholders consulted with during development of the Guidelines

Below is a list of all the relevant stakeholders that were consulted with during the co-development process of the Guidelines.

Retailers	Consumer Advocates	MEPs	Distributors	Support agencies	Social agencies	Regulatory agencies	Others
Contact, Electric Kiwi, Energy Online, ERANZ, Flick Electric, Genesis, Hanergy, Mercury, Meridian, Nova, OurPower, Pioneer Energy, Pulse Energy, Trustpower, Vocus, WEL Networks	Consumer NZ, Sustainability Trust	Intellihub, Vector Metering	Electra, The Lines Company, Vector, Wellington Electricity, ENA	FinCap, Anglican Care, Salvation Army, Presbyterian Support Services	MSD, Kainga Ora, Christchurch City Council	MBIE, ourselves (the Authority)	Utilities Disputes, NZ Telecommunication forum, University of Otago, Ministry of Health

Reasons for non-alignment stated by the retailer

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	Genesis	Frank Energy	Pulse EA	OurPower
Part 2 Publish Policy				
Part 3 Info/ Records			We do not record info on consumer's preferred times of contact, language, nor primary heating source.	
Part 4 Contracts		Both boxes ticked, not specified why.		
Part 5 Account Management	Whilst annual communication in respect of consumption data, our consumer care policy, and record keeping has not yet been introduced, consumption data is available to our customers 24/7 through our app and website.	Annual communication not sent in FY22 as new brand was being established. Scheduled to be sent in FY23.	When a customer enquires about changing pricing plan, we do not discuss other retailers' payment and pricing options.	
Part 6 Payment Difficulties				We do not offer formal payment plans, we work with customers to allow time to catch up on arrears where customers are committed to getting accounts back in order.
Part 7 Disconnection	Aligned to the extent customers have at least the time stipulated to address non-payment. Alignment with precise durations set out in guidelines pending changes to credit cycles in progress and expected to be completed this quarter.	Aligned with respect to providing appropriate time for customers to manage debt. Alignment with precise durations set out in guidelines pending changes to credit cycles in progress.	We disconnect customers for non-payment on estimated reads, and a small minority of our customers who do not have SMS or email will not receive over five notifications before disconnection.	Our process does not align with the recommendation for uncontracted premises, however we ensure that disconnection timing is in line with 66.c: "not carried out at a time which might endanger the wellbeing of an uncontracted consumer.
Part 8 MDCs	Aligned with respect to verified MDCs.	Same as Genesis.		

	Changes pending to align processes with respect to unverified MDCs.			
Part 9 Fees/ Bonds			We do not split payments for fees over an extended period of 5+ months.	
Part 10 Disclosure/ Monitoring				

	Simply Energy	Kakariki Power	Power Edge	Tensor	AA Power
Part 2 Publish Policy				CC Policy is currently being drafted and expected to be published on Tensor's website in September 2022.	
Part 3 Info/ Records		Customers are primarily MainPower staff and customers provide preferred email addresses and phone numbers. Customer info held in accordance with privacy laws.			
Part 4 Contracts					
Part 5 Account Management		Only has two residential plans. High Fixed for high volume customers and High Variable for low volume customers. Annual communication re: pricing reviews and correct plan are emailed to customers.			
Part 6 Payment Difficulties					
Part 7 Disconnection					
Part 8 MDCs	Current processes do not allow for the requirement of 79b & 81.		We do not accept MDCs and ask customers to move-out if they become MDCs.		
Part 9 Fees/ Bonds	Current processes do not allow for the requirement of 113 for our commercial customers who may or may not have residential consumers.				We have not yet confirmed the amount we intend to charge for any fees; therefore, these are not yet included in our CC Guidelines. We will update this ASAP. We do not currently accept bonds or sign customers into fixed term contracts.
Part 10 Disclosure/ Monitoring	Currently developing processes to ensure we meet the requirements of this section.	Policy provided to the Authority September 2022.			