

Consultation Response

Ref 2018

Submission to the Commission for Customers in Vulnerable Circumstances

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Age UK

Age UK is a national charity that works with a network of partners, including Age Scotland, Age Cymru, Age NI and local Age UKs across England, to help everyone make the most of later life, whatever their circumstances.

In the UK, the Charity helps more than seven million older people each year by providing advice and support. It also researches and campaigns on the issues that matter most to older people. Its work focuses on ensuring that older people: have enough money; enjoy life and feel well; receive high quality health and care; are comfortable, safe and secure at home; and feel valued and able to participate.

About this consultation

In February 2018, Energy UK – the trade association for the GB energy industry – launched the Commission for Customers in Vulnerable Circumstances to explore how standards of care and support could be improved in the energy market. The Commission is independently chaired by Lord Whitty and comprises of Commissioners from across business, charities and industry.¹ In April, it launched a call for evidence.

Introduction

Energy is an essential service and we consider it vital that all older people – especially those in vulnerable circumstances – have a secure and affordable supply of energy, and effective support to negotiate difficulties and navigate the market. We welcome the Commission and are happy to support it through this submission and follow-up meetings. Our response draws on insight from Age UK services that support older people in energy-related issues.

Key issues for Commissioners to consider

1. How to address incidents with billing complexity, and issues of debt and forbearance, particularly in the light of the debt ‘breathing space’ provisions in the Financial Guidance and Claims Act.
2. Customers making temporary or permanent moves, such as into hospital or a care home, leaving an empty home and unattended to bills, and in some cases requiring effective processes for lasting power of attorney.
3. Health problems and disabilities that make it difficult for customers to engage with their supplier or the wider market, and mean they require higher consumption.
4. Disincentives to switch, particularly the potential loss of the Warm Home Discount.
5. Reviewing the smart meter programme to fully understand the potential implications for vulnerable customers now and in the future, and to ensure they are treated fairly.

1. Are the areas of vulnerability identified in this call for evidence the correct areas for the Commission to focus on?

Age UK’s overall view of vulnerability

Age UK research has found that someone’s resilience and well-being in later life depend on a number of factors: their financial resources, physical health, cognitive and mental health, family support and social engagement. Vulnerability – in the sense of being at particular risk of financial or personal harm – can arise from a shortfall or decline in one or

more of these domains, for example from poor mental health, cognitive decline, the onset of physical disability or illness, or loneliness. Some sources of risk may be long-term (e.g. physical decline) while others may be temporary (e.g. illness, bereavement).

Age should not automatically be equated with vulnerability. Many older people are capable and self-reliant and do not wish to be seen as 'vulnerable'. However, many people develop health conditions or face challenges such as bereavement as they grow older.

Vulnerability is often caused or exacerbated by the behaviour of firms, which makes this Commission and its aim to improve support provided by companies all the more important.

Before commenting on the detail of vulnerability, we note three further things. Firstly, there cannot be an exhaustive 'list' describing aspects of vulnerability. The issues discussed below are examples of issues many older people face but there will be more besides (as well as different issues facing other people).

Secondly, energy companies' (in this response we focus on suppliers) attempts to deal with vulnerability should not be limited to those circumstances that are 'readily identifiable'. We expand on this below (Q6), but companies should design policies and practices that anticipate and account for vulnerabilities, as well as actively identifying customers in specific circumstances.

Thirdly, vulnerability is not only about circumstances that leave people at greater risk of harm, but also about experiencing a *greater degree of harm* when things go wrong. Older people living with frailty are particularly at risk of experiencing greater harm and being less able to recover.

Areas of vulnerability

The areas of vulnerability identified in the call for evidence are, broadly, the correct ones for the Commission to focus on. Here we comment on these as they relate to older people, before suggesting some additional areas, and then giving examples under Q3.

Financial vulnerability

Despite progress in recent years, many older people face financial hardship. One in six (16%) pensioners live in poverty, and a further one in ten (9%) have incomes just above the poverty line. Older pensioners (aged 85+), single people living alone, private tenants, and people from black and ethnic minorities are at particular risk of poverty. Many lack financial resilience; one in ten people aged 65+ say they would not be able to pay an unexpected expense of £200,² and a quarter of older households have no savings.³

Many older people do not claim benefits they are entitled to. Two in five (39%) people entitled to Pension Credit have not claimed it, missing out on an average of £43 a week. One in five (19%) people entitled to Housing Benefit to help pay their rent have not claimed it, missing out on an average of £55 a week. A total of £3.8 billion of Pension Credit and Housing Benefit went unclaimed in 2015/16.⁴

These financial vulnerabilities can make it difficult to pay bills (particularly unexpected bills), consume an adequate amount of energy to maintain health, reduce arrears, cope with emergency costs (e.g. broken heating system) and access rebates linked to benefits.

Transient/life events

Bereavement is a common experience among older people. It can have multiple harmful impacts, including intense feelings of loneliness, increased isolation or depression, as well as confusion and complexity in a person's financial affairs. This last impact is especially likely where a surviving partner is not used to managing utilities or other finances or does not have their own credit or digital 'footprint' to verify their identity when taking over responsibility for utility bills.

Another set of life events is going into hospital or residential social care. This can bring stress or complexity with managing utilities, e.g. missing bill payments, going into arrears.

Mental health

In England, depression affects 22 per cent of men and 28 per cent of women aged 65+.⁵ Mild cognitive impairment causes a slight but noticeable decline in cognitive abilities, such as memory and decision-making skills.⁶ One person in 14 (7%) aged 65+ lives with dementia. However, the risk of dementia increases with age, affecting one person in six over 80 and one in three over 95.⁷ Age UK services supporting people to maximise their income to stay warm and well at home report that many clients are living with a range of mental health conditions, including Alzheimer's disease, anxiety and depression.

These circumstances can be either the cause or effect of living in a cold home or having difficulties managing energy costs.

Physical health, disability

Older people are more likely to be living with long-term health conditions and impairments. A third (36%) of people aged 65-74 and half (47%) of those aged 75+ have a limiting longstanding illness.⁸ Age UK services supporting people to maximise their income to stay warm and well report that clients are living with a range of long-term conditions, including bronchitis, COPD, pulmonary fibrosis and stroke. In some cases, a person's health condition means they need to consume more energy to keep their home warmer.

Older people are more likely to be living with frailty, which NHS England defines as 'a loss of resilience that means people... do not bounce back quickly after a physical or mental illness, an accident or other stressful event.'⁹ One in seven (14%) people aged 60+ live with frailty: these are people who may not have a single identifiable condition but who could be tipped into a seriously life-limiting stage or even a loss of independence following a consumer issue that might be easily overcome by someone who is fitter.

Six in ten (59%) people aged 80+ have a disability.¹⁰ A third (35%) of those aged 75+ have sight loss which affects their day to day living, rising to half (50%) of those aged 90+.¹¹ More than 70% of people aged 70+ have some form of hearing loss.¹² These, and other impairments, can make it difficult for people to communicate with their energy company, which is particularly dangerous in emergency situations.

Wider vulnerable circumstances

In addition, Commissioners should consider the following circumstances.

Loneliness and isolation

Over 1 million older people say they always or often feel lonely. Half (49%) of those aged 75+ live alone and one in six (17%) older people have less than weekly contact with family, friends and neighbours.¹³ This can mean people have less support to deal with practical problems in the home, cope with emergencies such as power cuts or a broken heating system, or navigate the market.

Digital exclusion

Whereas virtually all (99%) 16-34 year olds use the internet, this falls to eight in ten (78%) of those 65-74 and four in ten (41%) of those 65+.¹⁴ For many older people, this means post, telephone and face-to-face communication are essential, and online-only services (e.g. price comparison websites) are not accessible.

Caring responsibilities

There are over 2 million older people providing unpaid care. More than half have a health condition or disability themselves. More than 400,000 are aged 80+.¹⁵ Over a third of carers aged 65+ provide 50 or more hours of care a week.¹⁶ Caring responsibilities can bring stress and social isolation, and extra costs in terms of heating bills.

2. In your experience, how can particular vulnerabilities impact a customer's ability to interact with their energy supplier?

Having outlined under Q1 the circumstances that can make older people vulnerable, in this section we present real, anonymised examples of harmful situations in the energy market. They reflect many of the circumstances described above. They come from energy support services delivered by local Age UKs and our Information & Advice service. We also set out some recommendations for how suppliers could deal with these situations.

Billing complexity and debt

Some people encounter difficulties with their bills, involving confusion or disputes around metering, and leading to bill shock and stress.

1. A woman in her 80s, living alone, was having problems with her meter and bills. This resulted in her supplier demanding payment of over £2k, causing stress.

This can lead to customers getting into debt and making unaffordable repayments.

2. A caller's sibling had fuel debt, which the caller felt was incorrect. The sibling was repaying it but the repayments were not affordable. They needed someone to go through the paperwork with them and talk to the supplier on their behalf.

Suppliers should have effective debt assistance and forbearance policies. This will enable them to support customers, minimise harm and find a sustainable solution. Suppliers

should consider how ill health may cause a customer's inability to pay, and their practices should account for this.

The Government should promptly develop a debt respite scheme (as set out in the Financial Guidance and Claims Act 2018) to protect vulnerable energy customers in debt.

Temporary and permanent moves

Emergencies and disruptions such as going into hospital can lead to debt and customers not being able to communicate with their supplier.

3. A woman in her 80s, with multiple health conditions, went into hospital a number of times. During this period, she forgot to make payments to her energy supplier and accrued debt. The supplier put her under pressure to make urgent payments, threatening her with debt collectors.

Suppliers should try to account for this kind of risk by registering customers with health conditions on their priority service registers (PSRs) and showing forbearance during health emergencies. They could highlight the advantages of paying by direct debit to customers at risk of health emergencies.

This can also happen when the customer has a more long-term move, such as into a care home. Where direct debit, lasting power of attorney (LPA) or deputyship arrangements are not in place, this can lead to complex and stressful situations.

4. A caller's parent was sectioned under the Mental Capacity Act and placed in a care home. The caller had applied for deputyship powers and was waiting for them to be finalised. During this time, their parent's utility bills were outstanding and the supplier was pursuing payment through court. They tried explaining the situation and reason for the delay to the supplier, but the supplier pressed ahead with court action.

Suppliers should improve how they deal with LPA and deputyship arrangements, including being flexible and showing forbearance in complex situations.

Even where an LPA is functioning well, suppliers may need to offer more information and support in 'empty home' scenarios, on matters such as standing charges.

5. A caller's parent moved into a care home. The caller had an LPA and arranged most issues apart from the energy supply for the now empty home. The caller was angry as they felt the supplier was charging excessive amounts, given almost no energy was being used. They came to Age UK asking if they could get this monthly bill reduced.

Where disputes arise about the cost of a standing charge, suppliers should explain these charges clearly and with sympathy, given that it may be a stressful situation, and give information on alternative tariffs that may be more appropriate.

Health problems and high costs

Many of the queries Age UK receives are from people living with health conditions or disabilities, wondering if they get can discounts on their bills. While providers may well have options such as the Warm Home Discount (WHD) or alternative schemes, it is clear that people do not approach their supplier, and more work is needed to understand why this is. For example, is it because they don't think they will be able to help, they think there will be repercussions if they admit to struggling, or because there are practical barriers such as managing complex telephone menus to get through to the right department?

6. A caller's parents in their 80s were living with various medical conditions. One parent permanently felt cold due to their medication, so the central heating was always on. They received a very high bill and wanted to know if there was a more affordable tariff they could be put on, given their circumstances.

7. A caller asked if there is a supplier that gives a discount to disabled people who need to use more electricity due to the equipment they require for their daily lives.

One way people can access lower prices is through switching supplier or tariff but some people face barriers to doing this, including lack of access to the internet, lack of knowledge of how to switch, and practical barriers such as hearing or visual impairment.¹⁷

8. An older man felt he was paying more than he could afford for energy. He had had a severe stroke, had poor mobility, found communication difficult and struggled with paperwork. He did not know how to switch energy supplier.

Suppliers should improve how they identify and support customers with health conditions and disabilities that mean they face higher costs and struggle to navigate the energy market. This could include highlighting financial support available (rebates, benefits), referring them to external sources of advice or support, and linking them to home energy efficiency improvement opportunities.

The Government and Ofgem should consider long-term financial and other support for ill and disabled customers facing extra costs, beyond the life span of the vulnerable customer and default tariff price caps currently being developed.

Disincentives to switch

There is also the risk that people successfully switch but end up worse off, for example through losing access to the WHD.

9. A client told Age UK they switched supplier, encouraged by 'widely publicised advice' and notification of a price increase from their supplier. The savings were modest but worthwhile, given their low income.

However, they then received a notice that their new supplier did not offer the Warm Home Discount, meaning any potential 'savings' from the switch would be wiped out by this loss. By this time, they were locked in to the new tariff for a year.

If a customer receiving the WHD loses it due to switching supplier, there should be a presumption that the contract is automatically unwound, with no cost (e.g. exit fees) to that customer.

When heating systems break, people with low incomes can struggle to access repairs to heat their homes. In addition, concern about the boiler being condemned can be a disincentive for a customer to arrange home energy efficiency improvements.

10. An older man with significant health issues, living alone, had an old boiler that was not working. His gas fire was also not working and he had no hot water. He did not have enough money to pay for repairs or replacements and did not know what help was available.

The Government, Ofgem and suppliers need to urgently find innovative ways to ensure vulnerable customers can access emergency repairs to heating systems to maintain at least a basic level of home safety and comfort.

Smart meters

Lastly, while smart meters can bring benefits for customers, aggressive promotion of them or a lack of support to use them can cause significant problems.

11. A client clearly declined an offer of a smart meter from their supplier, who then tried to install one anyway. They refused this but were left with a new pre-payment meter and no key for adding credit. The supplier arranged for a key to be delivered by post, but it did not appear, despite several promises. The client was hearing impaired and had COPD, putting them at serious risk if they were left without heating. They were very concerned this would happen, as they had little credit and had not been able to add any due to the lack of key. After multiple delays, and anxiety for the customer, the supplier successfully delivered the key.

Suppliers must take special care when offering or installing smart meters with vulnerable customers. Suppliers should never pressure them to accept one, imply that they are mandatory, or ignore their refusal. Ofgem should punish such behaviour.

Age UK supports moves to a smart meter system that would end the problem of estimated bills, but it is clear that the current system is a bit of a mess, with a lack of interoperability. The Government should review the scheme as a whole and Commissioners should consider the implications for vulnerable customers.

3. What in your experience are the key things that Commissioners need to understand in relation to particular vulnerabilities and how these might impact a customer's ability to engage in the energy market?

The real life examples under Q2 show a range of scenarios where people are at risk of harm, in some cases resulting from their supplier's lack of care or flexibility to deal with complex situations. Below we highlight some key things Commissioners should consider.

Health, disabilities, disruption and third party management

Many older people live with health conditions or disabilities that mean they require more energy to heat their home. In some cases, they are not aware of financial support, struggle to access cheaper tariffs and may be missing out on support through priority services.

Health can problems bring periods of disruption, such as going into hospital or a care home. Suppliers should be flexible and show forbearance during these stressful, uncertain periods.

This also presents situations where a relative of the customer is managing their finances on their behalf. They may or may not hold an LPA for the customer, and suppliers need to plan for this complex situation and be flexible.

Financial disputes

We hear about cases of disputes over metering and billing. Customers can be confused, overwhelmed and stressed by unexpected bills, increased monthly payments and the resulting debt. This is especially the case where people are isolated with no support network, in poor health or with declining cognitive abilities – these factors mean they are less able to manage the situation and advocate for themselves. An inflexible approach by suppliers that does not attempt to link the customer to in-depth support means such situations can spiral out of control.

Disproportionate impacts

For some older people, the impacts of problems with their supplier, inadequate/broken heating systems or under-consumption of energy are disproportionately high. Some people live with health conditions that worsen in a cold home, and others live with frailty.

More broadly, it is particularly important for older people to keep warm to protect their health. Cold homes put them at risk of heart attacks, strokes and respiratory problems, as well as depression, worsening arthritis, complications with diabetes and other chronic conditions, and increased accidents at home.¹⁸

4. What key trends should Commissioners be aware of?

Ageing population

In our ageing society with a growing population of older people, suppliers must plan for the fact that more customers in future will be living with multiple health conditions and disabilities, including specific conditions like dementia.

- The number of people 65+ is projected to rise by 40 per cent in the next 17 years.¹⁹
- The number of people 85+ is predicted to more than double in the next 23 years.
- An estimated 850,000 people are currently living with dementia. By 2025, this is expected to rise to 1.14 million, and to exceed 2 million by 2051.²⁰

Increasing digitisation

The move to smart meters is likely to bring the growth over time of time-of-use tariffs. There are risks that older, vulnerable or disengaged customers are 'left behind' and disadvantaged in this more complex market. An indicative study suggested that 'elderly consumers could all potentially be paying at least £30-£40 more a year under a time-of-use pricing structure.'²¹

Commissioners should therefore consider –

- How to ensure suppliers do not pressure customers who don't want a smart meter into accepting one.
- How to ensure suppliers provide effective support to those vulnerable customers who want one to understand and sustainably use them.
- The longer-term risks for vulnerable customers who don't have one, such as exclusion from cheaper deals or declining customer service standards.

The energy market is changing rapidly in other ways. There are currently over 60 energy suppliers in the market, compared to 13 in 2004.²² Coupled with smart meters, this adds up to an explosion in the number and type of suppliers and tariffs for consumers to choose from, with an accompanying boom in digital comparison and switching tools.

In this context, it is important to highlight the ongoing digital exclusion of older people, which means they are at risk of –

- Paying higher prices through exclusion from the best deals, including online-only tariffs and collective switches/group deals.
- Exclusion from digital comparison and switching tools, increasingly necessary to navigate the market.
- Extra payment costs.
- Poorer customer service in terms of communication with their supplier.
- Lack of access to online advice on a range of energy issues, including home energy efficiency improvements.

Over half (56%) of people aged 75+, and a third (35%) of those 65-74 do not use the internet.²³ As Table 1 shows (using older data), non-use of the internet is associated with socio-economic background as well as age. Further, older people using the internet conduct a smaller range of activities online; people aged 75+ are less likely to do banking online (26% compared to 53% of all internet users) and make transactions (17% v 52%).²⁴

Table 1. Non-internet users, by age and socio-economic background

% NON-INTERNET USERS	All	16-24	25-34	35-44	45-54	55-64	65-74	75+
AB	5%	0%	0%	1%	0%	4%	12%	35%
C1	8%	2%	0%	3%	6%	6%	22%	58%
C2	20%	0%	4%	8%	3%	26%	46%	80%
DE	22%	7%	6%	16%	15%	32%	35%	81%
All	13%	3%	3%	6%	6%	16%	29%	64%

(Source: Ofcom, 2016.⁴)

For the foreseeable future, a considerable number of older people will not be using the internet. Looking ahead, we caution against simplistic assumptions that everyone will soon become internet users. Exponential trend projections illustrate that by 2037, 10 per cent of those aged 55+ will not be online and achieving the goal of getting the vast majority of the population online is unlikely to happen in the first half of the 21st Century.²⁵

5. Can you share any examples of best practice to support customers in vulnerable circumstances, either within energy or other relevant sectors?

Our main aim in this response is to highlight the vulnerabilities and harmful situations older people experience in the energy market. We look forward to seeing examples of supplier best practice gathered through the Commission.

Commissioners should consider the following issues, many of which we have touched on.

Suppliers

1. How well are they identifying and supporting vulnerable customers? Should they set internal targets for their priority service registers?
2. Can they improve how they identify and support customers with health conditions and disabilities that mean they face higher costs and struggle to navigate the market?
3. Do they train front-line staff to become Dementia Friends; an important way to more fully identify and support older people living with dementia?
4. Do they have effective and flexible policies for lasting power of attorney and deputyship, and for receiving contact from concerned relatives of customers?
5. Do they have effective debt assistance and forbearance policies in place, including partnerships with debt advice agencies, that result in good outcomes for customers? Do these work in health emergencies and 'empty home' situations?
6. Are they supporting Government proposals for a debt respite scheme to give customers in debt 'breathing space'?
7. Do they take special and appropriate care when offering or installing smart meters with vulnerable customers, including not pressuring them to accept one?
8. As new payment systems are developed, are suppliers offering a range of payment options to suit the varied needs of people in vulnerable circumstances?
9. Do any suppliers have (or are willing to trial) an internal advocate for vulnerable customers, linked in part to those customers on the PSR?

The Government and/or Ofgem should –

1. Develop a process whereby a new contract is automatically unwound, with no cost to the customer, where they have lost the Warm Home Discount during a switch.
2. Urgently find innovative ways to ensure vulnerable customers can access emergency repairs to heating systems to maintain at least a basic level of home safety and comfort.
3. Promptly develop a debt respite scheme (as set out in the Financial Guidance and Claims Act 2018) to protect vulnerable energy customers in debt.
4. Consider long-term financial and other support for ill and disabled customers facing extra costs, beyond the life span of the price caps currently being developed.

5. Review the smart meter programme as a whole, including the experiences of vulnerable customers.
6. Develop options for automatic compensation for vulnerable customers/customers on a PSR, e.g. slow repairs, missed appointments.
7. Make support for vulnerable customers more consistent across the industry, among suppliers of all sizes and including new entrants.

6. What are the particular challenges that suppliers face in identifying and supporting customers in vulnerable circumstances via different channels e.g. telephone, online?

We are aware of the challenges suppliers face in identifying customers in vulnerable circumstances. It is important that suppliers do this as best they can, but they should also *plan in advance* for common customer circumstances or life events that can make people vulnerable. This could be understood as a 'expect and prevent strategy'. Examples of these expected circumstances include bereavement, donating LPA to a relative, and going into hospital or a care home.

This could help suppliers plan how to practically support customers in these circumstances, but also to spot the signs of customers going through them. Suppliers should then test their systems to make sure they have anticipated and developed appropriate responses to all reasonably foreseeable customer needs.

Further, we would like to see suppliers not only respond to customer vulnerabilities, but also to consider pro-actively if or how their own practices cause or exacerbate them. They should, for example, test how all their policies and processes (e.g. debt recovery) impact people with different types of vulnerability.

Suppliers should maximise the use of their PSR. For example, PSR data should be used to flag the fact that a customer has a hearing impairment so that call handlers can adjust how they speak to them. Given the widely shared aim of more switching, it is essential that vulnerability data is reliably transferred during a switch.

More broadly, there may be opportunities in light of the Digital Economy Act for suppliers to access data from other agencies that will help them highlight and address circumstances that could make customers vulnerable. Such activity would have to be subject to data protection and privacy requirements.

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- ¹ <https://www.energy-uk.org.uk/customers/2014-10-19-17-29-07/commission-for-customers-in-vulnerable-circumstances.html>
 - ² Households Below Average Income 2015/16, DWP, 2017
 - ³ Family Resources Survey 2016/17
 - ⁴ Income-related benefits: estimates of take-up: financial year 2015/16, DWP 2017
 - ⁵ Health Survey for England 2005: Health of Older People, IC NHS 2007
 - ⁶ <https://www.alz.org/dementia/mild-cognitive-impairment-mci.asp>
 - ⁷ The Alzheimer's Society fact sheet 400
 - ⁸ The estimate is for the UK, based on Great Britain data from the General Lifestyle Survey 2011, Office for National Statistics, 2013
 - ⁹ <https://www.england.nhs.uk/ourwork/ltc-op-eolc/older-people/frailty/>
 - ¹⁰ Family Resources Survey 20013/14, DWP, 2015
 - ¹¹ Living with sight loss: Updating the national picture. RNIB and NatCen, 2015
 - ¹² Action on Hearing Loss
 - ¹³ https://www.ageuk.org.uk/globalassets/age-scotland/documents/reports-and-publications/reports-and-briefings/health--wellbeing/rb_june15_lonelines_in_later_life_evidence_review.pdf
 - ¹⁴ <https://www.ons.gov.uk/businessindustryandtrade/itandinternetindustry/bulletins/internetusers/2017>
 - ¹⁵ University of Essex. Institute for Social and Economic Research and NatCen Social Research, Understanding Society: Waves 1-5, 2009-2014 [computer file]. 7th Edition. Colchester, Essex: UK Data Archive [distributor], November 2015. SN: 6614, <http://dx.doi.org/10.5255/UKDA-SN-6614-7>
 - ¹⁶ Age UK analysis of Understanding Society waves 3 and 4, 2015
 - ¹⁷ https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/consultation-responses-and-submissions/safe-at-home/crs_june16_bis_consumer_landscape_and_quicker_switching.pdf
 - ¹⁸ The Marmot Review Team (2011), The Health Impacts of Cold Homes and Fuel Poverty, London: Friends of the Earth
 - ¹⁹ National population projections for the UK, 2014-based, Office for National Statistics, 2015
 - ²⁰ The Alzheimer's Society Dementia 2014 <http://www.alzheimers.org.uk/infographic>
 - ²¹ <https://www.citizensadvice.org.uk/Global/CitizensAdvice/Energy/Frozen%20out.pdf>
 - ²² <https://www.ofgem.gov.uk/data-portal/retail-market-indicators>
 - ²³ https://www.ofcom.org.uk/_data/assets/pdf_file/0020/102755/adults-media-use-attitudes-2017.pdf
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