



# LOCAL ENERGY ADVICE PROJECT

Clackmannanshire Citizens Advice Bureau

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## Introduction

In 2019, the Scottish Government passed legislation updating the definition of fuel poverty in Scotland<sup>1</sup>. A household is now considered to be fuel poor if the fuel costs necessary for the home are more than 10% of the household's adjusted net income, and after deducting fuel costs, childcare costs and any benefits received for care needs, the household's remaining adjusted net income is insufficient to maintain an acceptable standard of living for members of the household.<sup>2</sup> The most recent fuel poverty rates for Scotland were published in 2019, and 25% of Scottish households were identified as living in fuel poverty.<sup>3</sup> Due to the impact of the Covid-19 pandemic, which saw the average UK household's energy bill increase by £32 per month<sup>4</sup>, the Scottish Government estimated fuel poverty levels could rise to 29%. The most recent estimates, as of April 2023, show an estimated 37% of Scottish Households living in fuel poverty,<sup>5</sup> equating to nearly two fifths of households in Scotland.

Clackmannanshire has a higher than average rate of fuel poverty, with the last confirmed statistics in 2018 seeing 27% of households living in fuel poverty<sup>6</sup>. This equates to just over six thousand households in the area and is higher than the national average at the time of 25%. Furthermore, 11% of households in Clackmannanshire are considered to be in extreme fuel poverty<sup>7</sup>. These figures equate to one in four households in Clackmannanshire being classed as fuel poor, including two fifths of single pensioner households, two fifths of social housing tenants who have a long term illness or disability, and one fifth of children.<sup>8</sup> Due to the existing inequalities in Clackmannanshire, with 28% of the local community living in the

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<sup>1</sup> Fuel Poverty (Targets, Definition and Strategy) (Scotland) Act 2019

<sup>2</sup> Ibid, S.3(1)

<sup>3</sup> Energy Action Scotland (no date) Fuel poverty overview, Energy Action Scotland. Available at: <https://www.eas.org.uk/fuel-poverty-overview> (Accessed: 15/05/2023).

<sup>4</sup> Meera Kotak, Victoria Chappell (8<sup>th</sup> March 2021) How Covid-19 has exacerbated fuel poverty in the UK, Charles River Associates. Available at: <https://www.crai.com/insights-events/publications/how-covid-19-has-exacerbated-fuel-poverty-in-the-uk-2/> (Accessed: 05/05/2023).

<sup>5</sup> The Scottish Fuel Poverty Advisory Panel (2023) Key facts, Fuel Poverty Scotland. Available at: <https://fuelpovertypanel.scot/key-facts/#Footnotes> (Accessed: 19/06/2023).

<sup>6</sup> Clackmannanshire Council (2020) Fuel poverty, Fuel Poverty. Available at: <https://www.clacks.gov.uk/housing/fuelpoverty/#:~:text=Fuel%20poverty%20statistics%20are%20published%20by%20the%20Scottish,25.0%25%20for%20Scotland%20as%20a%20whole%20in%202018%29.> (Accessed: 05/06/2023).

<sup>7</sup> Ibid

<sup>8</sup> Ibid

most deprived SIMD quintile<sup>9</sup>, the estimated increase of fuel poverty levels will have a vastly detrimental effect on the people of Clackmannanshire. Therefore a need for targeted advice and support to tackle fuel poverty in the area was identified.

The Local Energy Advice Project (LEAP) began in 2019 to provide advice and support on energy issues. The local need for specialist energy advice led to a 57% increase in energy advice given in 2020 in comparison to 2019. The need for energy advice in the area is so significant that the project was expanded in 2021 and ran until the middle of 2023, with this report focusing on this time period. LEAP aimed to help vulnerable people make informed decisions, control their budget and usage, and avoid or alleviate fuel poverty. By providing this targeted help, the project worked towards reducing fuel poverty by making energy consumers more energy aware, assisting and advocating for those who were unable to do so themselves, reducing or eliminating the fuel debts of clients, and helping people in Clackmannanshire effectively manage their energy supply. This was carried out through one to one individually tailored energy advice sessions, ongoing casework for complex issues, and group energy sessions. It is hoped that in achieving these aims, a reduction in the number of households in Clackmannanshire experiencing fuel poverty can be seen.

This report will look at the vulnerabilities which can put a household more at risk of experiencing fuel poverty, which were identified throughout the duration of the project and compare these to national trends and policy, such as the Ofgem Consumer Vulnerability strategy. Following this, the outcomes of LEAP will be assessed and what can be learned from the project, as well as looking to wider changes which could be implemented to reduce fuel poverty levels.

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<sup>9</sup> Geonetwork Team (2007) Scottish Spatial Data Infrastructure, SpatialData.gov.scot. Available at: <https://www.spatialdata.gov.scot/geonetwork/srv/eng/catalog.search> (Accessed: 30 June 2023).

## Chapter One: Barriers to Participating in the Energy Market and Vulnerable Consumers

Fuel Poverty can affect anyone, but there are a number of barriers that can prevent a person from engaging in the energy market and increase vulnerability to fuel poverty. Some of the barriers that have been previously identified are low income, renting your accommodation, or living with a long term health condition. These vulnerable groups are far less likely to engage with the energy market due to lower levels of confidence in engaging, perceived hassle and heightened concerns about costs. Therefore, they may be missing out on more affordable tariffs and paying more than necessary in energy bills. Throughout the course of this project, multiple potential vulnerabilities were identified as well as the impact they can have.

### 1.1. Age

One of the barriers to accessing the energy market is age. It has been found that mid-aged people (ages 35-64) are most likely to be actively engaged with the energy market, with Ofgem's consumer survey identifying that this age group represented 66% of those who are engaged with the energy market<sup>10</sup>. On the other hand, young working age people (those aged 16-34) are considered to be a vulnerable group. Ofgem identified in their consumer survey that this age group make up 18% of those disengaged from the energy market, compared to just 15% of those who are engaged with the energy market<sup>11</sup>. For those who were engaged, younger age groups were far more likely to be first time switchers rather than repeat switchers, who are more likely to be mid-aged. However, it was also recorded that trust in energy is highest amongst younger age groups, with 16-34 year olds reporting a 4% rate of trust<sup>12</sup>. Therefore lack of trust is not a barrier to engagement, with lower levels of trust being recorded across mid-aged groups but also the highest levels of engagement, but in fact a generic trust could encourage those who are disengaged to remain that way. Ofgem also identified that nearly a third of 16-34 year olds have used emergency credit compared to 24% among those aged 35 and over, and one in seven (14%) had asked their

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<sup>10</sup> Bridget Williams, Gemma Waring, Sophie Thompson (2020) Ofgem Consumer Survey 2020: Update on Consumer Engagement with Energy, Ofgem. Available at: <https://www.ofgem.gov.uk/publications/consumer-survey-2020-update-consumer-engagement-energy> (Accessed: 08/05/2023).

<sup>11</sup> Ibid

<sup>12</sup> Ibid

supplier for additional emergency credit compared to just 2% of those aged 35 and over<sup>13</sup>. An analysis carried out by Citizens Advice on fuel poverty data and the protected characteristics under the Equality Act 2010 had similar findings. They identified that between 2019 and 2020 bureaux clients seeking fuel poverty related advice were more likely to be aged between 25 and 44, and less likely to be aged over 60 than clients seeking advice on other topics<sup>14</sup>. The percentage of fuel poverty-related clients in this age band was 45.3%, compared to 34.6% of non- fuel poverty-related clients. In comparison, over 60s represented 15.7% of the fuel poverty-related group compared to 27.3% of non-fuel poverty-related clients<sup>15</sup>. These figures could be directly linked to other vulnerabilities. For example, young people are more likely to live in poor quality housing, with the Guardian reporting that one in six young people in the UK living in poor quality housing.<sup>16</sup> Similarly, young people are more likely to live in rental properties than other age groups, with 65% of 16-24 year olds and 42% of 25-34 year olds living in rented accommodation<sup>17</sup>. Furthermore, the Office for National Statistics identified that people aged 16-24 have lower participation in the labour market than other age groups<sup>18</sup>. Therefore, while age may not be a direct vulnerability of fuel poverty, this age group is more likely to experience other vulnerabilities and therefore cannot be overlooked.

While those aged over 65 are less likely to seek advice on energy, they cannot be ignored as a vulnerable group. Research published in 2018 found that older households were less likely

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<sup>13</sup> Ibid

<sup>14</sup> Rebecca King, Michael O'Brien (December 2021) Fuel Poverty Advice and the Protected Characteristics: An analysis of data from the Citizens Advice Network in Scotland, Citizens Advice Scotland. Available at: <https://www.cas.org.uk/publications/fuel-poverty-advice-and-protected-characteristics-analysis-data-citizens-advice-network> (Accessed 08/05/2023)

<sup>15</sup> Ibid

<sup>16</sup> Richard Partington (15<sup>th</sup> April 2023) 'Millions of young adults living in poor quality housing, UK study shows', The Guardian. Available at: <https://www.theguardian.com/business/2023/apr/15/young-adults-uk-housing> (Accessed: 30/06/2023).

<sup>17</sup> Kevin Peachey, Clara Guiborg, Nassos Stylianou (3<sup>rd</sup> October 2018) 'Where does rent hit young people the hardest in Britain?', BBC News. Available at: <https://www.bbc.co.uk/news/business-45559456#:~:text=Renting%20has%20more%20than%20doubled%20over%20the%20last,privately%2C%20according%20to%20House%20of%20Commons%20Library%20research.> (Accessed: 30 June 2023).

<sup>18</sup> Ellie Taylor, L.S. (2022) Young people in the labour market by socio-economic background, UK: 2014 to 2021, Young people in the labour market by socio-economic background, UK - Office for National Statistics. Available at: <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/article/s/youngpeopleinthelabourmarketbysocioeconomicbackgrounduk/2014to2021#comparison-with-other-age-groups> (Accessed: 30/06/2023).

than other demographics to self-report as struggling with issues related to fuel poverty<sup>19</sup>. Those who reported not having any financial struggles were nearly four times as likely to be over 65 than any other age group.<sup>20</sup> Although the findings concluded that those who struggled to heat their home in winter were more likely to be younger than older, the idea of what it meant to be managing financially was not a fixed one. Many over 65s reported that they were managing by reducing expenditure in other areas such as food and travel<sup>21</sup>. This suggests that reducing other necessary expenditure in order to afford energy bills may be a factor in low self-reporting amongst older households.

A further issue facing older age groups is that of digital exclusion. With constant innovation in technology and a move to more digital means in all areas following the Covid-19 pandemic, energy bills and communications with supplier are mainly managed online. Ofgem reports that even though an increasing number of consumers aged 75+ are using smartphones, they are still less likely to consider this their main device for connecting to the internet<sup>22</sup>. This age group's connectivity to broadband also remains significantly behind other groups. A report from the University of Bristol found that digital capability was a particular issue for older participants in the studies focus group<sup>23</sup>. While some were confident about keeping safe and interacting online, many others were not. Some did not access digital services at all, but for others their internet use was very limited. As a result, older age groups are significantly disadvantaged when it comes to engaging with the energy market and their suppliers, as this is conducted primarily online. This was reflected in the clients we saw at the bureau throughout the project. For example one client, who was 88 years old, had not been able to receive a proper energy bill and statements, as they had been sent to their email and they did not feel confident using the internet or digital services. With communications being carried out predominantly online, there is a risk that those who are not confident digitally are missing out on important communications. Similarly, they

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<sup>19</sup> Craig Salter (June 2018) Speaking Up: Understanding Fuel Poverty Support Needs, Citizens Advice Scotland. Available at: <https://www.cas.org.uk/publications/speaking-understanding-fuel-poverty-support-needs> (Accessed 19/06/2023)

<sup>20</sup> Ibid

<sup>21</sup> Ibid

<sup>22</sup> Ibid at 10

<sup>23</sup> Sara Davies, Lorna Trend (November 2020) the Poverty Premium: A Customer Perspective, University of Bristol. Available at: <https://www.bristol.ac.uk/media-library/sites/geography/pfrc/The-poverty-premium-A-Customer-Perspective-Report.pdf> (Accessed: 05/06/2023)

may be losing out on the best tariffs and paying more in energy bills than necessary, as they are unable to access online comparison tools. As a result of this, older consumers may be largely impacted by fuel poverty, but are underrepresented in studies due to an unwillingness to self-report and instead making significant sacrifices in other areas.

## **1.2. Ill Health and Disability**

Ill health and disability can be one of the most significant risk factors for fuel poverty and can have a direct impact on a household's energy bills. Research by Scope identified that over a third of disabled adults feel that their impairment or condition has an impact on what they pay for energy.<sup>24</sup> This may be because they need to use more heating to stay warm or due to the cost of running assistive equipment. These findings were also prevalent amongst clients advised over the course of the LEAP project, with many reporting having a disability or health condition. One client reported being housebound following a diagnosis with Parkinson's disease. As they were now spending more time at home, more energy was being used and they would be unable to cover the costs of their energy bills going forward. People with health conditions and disabilities being more likely to be classed as fuel poor was also identified across the wider Citizens Advice network in Scotland. A 2021 report found that clients seeking advice on fuel poverty related issues were more likely to have a health condition that limited them a little compared to clients seeking advice on other topics. 21.6% of fuel poverty-related clients reported having a condition that limited them a little, despite this group only representing 16.1% of all clients seen<sup>25</sup>. A 2013 study aiming to better understand the energy needs of disabled adults and families with disabled children found that households with one or more disabled members are more likely to be in poverty or on a low income<sup>26</sup>. Similarly, those on lower incomes are more likely to have a long-term, limiting illness than those in better off households. The study found that poor housing is more prevalent amongst households with a disabled member, with analysis showing that these households are more likely to have low levels of energy efficiency. This is a cause for

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<sup>24</sup> Evan John, Greg Thomas, Anel Touchet (February 2019) the Disability Price Tag, Scope. Available at: <https://www.scie-socialcareonline.org.uk/the-disability-price-tag-2019/r/a110f00000TDBXvAAP> (Accessed: 08/05/2023)

<sup>25</sup> Ibid at 14

<sup>26</sup> Mike George, Professor Cosmo Graham, Linda Lennard (June 2013) The Energy Penalty: disabled people and fuel poverty, University of Leicester. Available at: <https://www.fuelpovertylibrary.info/content/energy-penalty-disabled-people-and-fuel-poverty-1> (Accessed: 08/05/2023)



concern due to the fact that those with long term health conditions are often more vulnerable to the impacts of living in a cold, damp home. Those with chronic health conditions also reported they felt particularly vulnerable to the impacts of living in a cold, damp home<sup>27</sup>.

Disability and ill health can also pose a barrier when it comes to engaging with the energy market. Disabled people are generally less likely to use the internet, with statistics showing 67% of disabled people using the internet compared to 92% without disabilities<sup>28</sup>. As a result, this prevents them from accessing price comparison tools and important communications from their supplier which may have been issued via email, leading to digital exclusion. The CMA reports that consumers with physical conditions or disabilities were particularly unwilling to tolerate any uncertainty or disruption in markets that they are dependent on<sup>29</sup>. Scope's research found that 56% of disabled adults consider a supplier's customer service reputation as an important factor when choosing a supplier, information which is not available via comparison tools<sup>30</sup>. Both of these factors mean that those with disabilities or health conditions will be less likely to engage with the energy market and shop around for the best tariffs due to the risk it poses. This is reflected in the findings in the Ofgem 2020 consumer survey, which found that 37% of disabled consumers had not engaged with the energy market in the previous twelve months<sup>31</sup>.

It is not only physical health that can present a barrier to engagement, as mental health can also present a significant barrier. The Money and Mental Health Policy Institute found that 75% of customers who have experienced mental health problems have serious difficulties engaging with at least one commonly used communication channel. For example, 54% of customers who have experienced a mental health condition reported having serious

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<sup>27</sup> Ibid

<sup>28</sup> Ofgem (October 2019) Consumer Vulnerability Strategy, Ofgem. Available at: <https://www.ofgem.gov.uk/publications/consumer-vulnerability-strategy-2025> (Accessed: 12/05/2023)

<sup>29</sup> Competition and Markets Authority (July 2018) Vulnerable Consumers, the CMA. Available at: <https://www.gov.uk/government/publications/vulnerable-consumers> (Accessed: 23/06/2023)

<sup>30</sup> Ben Wealthy (March 2018) Out in the Cold, Scope. Available at: <https://www.scope.org.uk/scope/media/files/campaigns/out-in-the-cold-report.pdf?la=en&hash=B0A074432B1AB462AA0D9FAFC18B541F787D3961> (Accessed:23/06/2023)

<sup>31</sup> Ibid at 10

difficulties using the telephone<sup>32</sup>. Four in ten people with a mental health condition also exhibited significant levels of anxiety when dealing with essential service providers, almost three times the rate amongst people who have never experienced mental health problems<sup>33</sup>. Furthermore, messages from essential service providers can often be overly complex. People with a mental health condition may be particularly disadvantaged by this, as receiving information they are struggling to understand can be highly distressing. This may result in people struggling to pay their bills on time and switch to the best deals. Similar to older people, those with a mental health condition struggle to self-report and many do not feel comfortable disclosing any conditions to their provider. This means they may not be able to access any assistance and support their supplier may offer, such as the priority services register, which is designed to assist those in vulnerable situations. These factors present a significant barrier to engaging with their provider and may result in those with a mental health condition remaining on a higher tariff.

### **1.3. Low Income**

One of the key drivers of fuel poverty is low income. The Covid-19 pandemic saw the average UK household energy bill increase while 1.62 million were left unemployed and a further 9.6 million were furloughed<sup>34</sup>. This combination of increasing energy bills and loss of income has significantly exacerbated fuel poverty issues across the country. Many of the clients who sought energy advice throughout the duration of the project reported having financial issues or being on a low income. One client reported being on universal credit, but due to having arrears to their supplier, they were having £68.02 a month in deductions taken from her award, and as a result they were struggling financially. While Ofgem reported that a negative financial impact from the pandemic may be driving more consumers on a low income to engage with the energy market,<sup>35</sup> engagement rates amongst this group remain lower than other economic groups. 39% of the respondents to the 2020 Ofgem consumer survey were classed as being financially constrained<sup>36</sup>. This refers

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<sup>32</sup> Merlyn Holkar, Katie Evans, Kate Langston (July 2018) Access Essentials, Money and Mental Health Policy Institute. Available at: <https://www.moneyandmentalhealth.org/publications/accessessentials/> (Accessed: 23/06/2023)

<sup>33</sup> Ibid

<sup>34</sup> Ibid at 4

<sup>35</sup> Ibid at 10

<sup>36</sup> Ibid

to those who are using a pre-payment meter, are in arrears on their energy bills and/or are in receipt of means tested benefits. 48% of these consumers had switched in the past twelve months, but were still less likely to do so than non-financially constrained consumers who switched at a rate of 57%<sup>37</sup>. Ofgem recorded that 43% of consumers surveyed in 2020 that were in financial difficulty and 62% of consumers on pre-payment meters did not engage with the energy market in the previous 12 months<sup>38</sup>.

Those in financial difficulty were less likely to say they weren't engaging because they were satisfied with their current tariff, but more so that they weren't switching due to the weight of other priorities and less confidence in engaging with the energy market. This was echoed in a report from the University of Bristol, which found that constrained budgets do not allow many households to access cheaper alternatives and over time this can manifest as substantial risk aversion<sup>39</sup>. Furthermore, it was found that decision making during times of heightened stress or substantial time pressure resulted in less well considered actions or sometimes a withdrawal from engaging with markets. Digital exclusion also plays a role with those on a low income, with these consumers reporting being less likely to have switched due to limited access to the internet. This also means they are less likely to be able to communicate with their energy supplier through digital means, further preventing access to the best deals. Those experiencing financial difficulty are often facing additional challenges and vulnerabilities such as ill health and caring responsibilities. Therefore, it was not always possible for them to find the time to look for the best deals on top of their other daily responsibilities<sup>40</sup>. As a result of these factors, low income households are far less likely to be engaging with the energy market and therefore are unable to access the best deals available to them.

#### 1.4. Housing Status

Housing status can also present a substantial barrier to accessing the energy market. Ofgem's consumer survey reported that owner-occupier's made up 74% of those who had engaged with the energy market in the last 12 months, compared to just 13% living in

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<sup>37</sup> Ibid

<sup>38</sup> Ibid

<sup>39</sup> Ibid at 23

<sup>40</sup> Ibid

private rental accommodation and 12% of those living in local authority rented accommodation<sup>41</sup>. It has also been found that 18% of those in the private rented sector are living in fuel poverty, compared to 8% of owner occupier's<sup>42</sup>. Living in a rented property, whether private or socially rented, can prevent a significant barrier to engagement and improving the energy efficiency of the property. This was seen in many clients advised throughout the project, with many reporting as residing in rented accommodation. One client, who resided in council rented accommodation, was struggling to heat their home due to damp conditions from disrepair and structural instabilities in the property. Tenants have reported having little control over replacing or changing their heating system as these decisions are made by their landlord. These barriers were more likely to be present for households in extreme fuel poverty. The majority of homes in the UK have poor energy efficiency, and fall below the average energy performance certificate (EPC) bands A through C. Approximately 67% of privately rented homes are rated as less than EPC B and C<sup>43</sup>. Poor energy efficiency can lead to suboptimal heating, insulation and ventilation, and consequently higher overall energy costs. For example, a property with an EPC rating of D can cost an average of £240 more per annum for energy than higher rated properties, and this figure jumps to nearly £2000 more for a property with an EPC rating of G<sup>44</sup>. The impact of poor energy efficiency could also be seen amongst the clients we advised, with one client who owned their three bedroom property reporting that they were struggling to heat the property due to poor insulation and as a result, they are struggling to manage their energy bills. While there are Government schemes available to help improve the energy efficiency of a property, such as Warmer Homes Scotland, many of these schemes are restricted to those in receipt of qualifying benefits and knowledge of these schemes remains low.

A further issue for those in the private rented sector to engage in the energy market is perceived lack of choice in supplier. For majority of those in the private rental sector, the account was in their name and they were expected to manage it. In most instances, when a tenant first moved in, the landlord would change the account holder from the previous tenant to the new tenant. This means that tenants are not given a choice of energy supplier

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<sup>41</sup> Ibid at 10

<sup>42</sup> Ibid at 4

<sup>43</sup> Ibid

<sup>44</sup> Ibid

at the start of their contract and there was generally no encouragement or support from landlords to see whether a different supplier could result in savings<sup>45</sup>. Coupled with already low engagement rates in this sector, private rental tenants may be far more likely to remain with the one supplier on the same tariff and as a result be negatively impacted by loyalty penalties. While the study found that many tenants were aware of their right to switch, it was found that tenants new to renting were the least aware of their right to switch and those on short term contracts were the least likely to consider switching<sup>46</sup>. Therefore, more work may need to be done to make tenants more aware of their right to switch supplier and the potential benefits of doing so to increase their engagement with the energy market.

### 1.5. Caring Responsibilities and Household Type

In England, it has been well documented that single parents are the household type most likely to be living in fuel poverty<sup>47</sup>. A similar trend was identified amongst clients across the Citizens Advice network in Scotland, finding that the most common household types receiving fuel poverty-related advice are single working-age adults, making up 39.7% of all fuel poverty-related clients, and single parent families, who represent 13.8% of all fuel poverty-related clients<sup>48</sup>. This was also identified in the clients advised throughout the project, with many living alone or having caring responsibilities of some kind. For example, one client was a single parent living with their daughter, and had accrued around £500 of debt with her supplier.

Research by the University of Lincoln highlighted that couples who are married or in a civil partnership, especially those who do not have children, are less likely to be in the bottom two quintiles of household income distribution than any other family type<sup>49</sup>. Research highlights that a higher percentage of people who are married or in a civil partnership are in

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<sup>45</sup> Steve Morley (21<sup>st</sup> June 2021) Private Rented Sector Barriers to Energy Market Engagement, Citizens Advice. Available at:

[https://www.citizensadvice.org.uk/Global/CitizensAdvice/Energy/1173%20Citizens%20Advice%20PRS%20Report%20Impact%20FV%20\(1\)%20\(1\).pdf](https://www.citizensadvice.org.uk/Global/CitizensAdvice/Energy/1173%20Citizens%20Advice%20PRS%20Report%20Impact%20FV%20(1)%20(1).pdf) (Accessed: 23/06/2021)

<sup>46</sup> Ibid

<sup>47</sup> Department for Business, Energy & Industrial Strategy (4<sup>th</sup> March 2021) Annual Fuel Poverty Statistics Report: 2021, UK Government. Available at: <https://www.gov.uk/government/statistics/annual-fuel-poverty-statistics-report-2021> (Accessed: 23/06/2023)

<sup>48</sup> Ibid at 14

<sup>49</sup> Martin Culliney, Tina Haux, Stephen McKay (April 2014) Family Structure and Poverty in the UK: An evidence and policy review, Joseph Rowntree Foundation. Available at: [http://eprints.lincoln.ac.uk/id/eprint/14958/1/Family\\_structure\\_report\\_Lincoln.pdf](http://eprints.lincoln.ac.uk/id/eprint/14958/1/Family_structure_report_Lincoln.pdf) (Accessed: 23/06/2023)

paid work compared to those who are co-habiting, as well as being more likely to be owner-occupiers<sup>50</sup>. It's also been found that children in families where the parents were married or in a civil partnership were less likely to be in low or severely low income households when compared to those with cohabiting or single parents. While it cannot be said that these differences are a result of marital status, statistics have shown that those who are single, especially single parents, are more likely to seek fuel poverty-related advice than those who are married or in a civil partnership<sup>51</sup>.

A slight gender disparity was also noted in a Citizens Advice Scotland study on fuel poverty and the protected characteristics. It was found that women represented 55.4% of fuel-poverty related clients, whereas men represented 44.6%<sup>52</sup>. A possible explanation suggested for this is the different types of household composition. Clients who are single parents are almost eight times as likely to be female rather than male. When this is factored in, the difference between male and female fuel poverty-related clients more than doubles from 333 to 710<sup>53</sup>.

While household type and caring responsibilities do not present a direct barrier to engaging with the energy market, it can be a driver of low income and in turn, lead to vulnerability to fuel poverty. Married couples will have a higher household income than single person households, and households without children will have less necessary expenditure than those with children. It has been established that low income households with children are likely to prioritise necessities for their children, therefore ensuring they are providing for their children will outweigh the time it will take to shop around for the best energy tariffs. As a result of this, they are more likely to opt to remain with their current supplier and may miss out on the best tariffs available.

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<sup>50</sup> Claire Crawford, Alissa Goodman, Ellen Greaves, Robert Joyce (2013) Cohabitation, Marriage, Relationship Stability and Child Outcomes: Final Report, Institute for Fiscal Studies. Available at: <https://ifs.org.uk/publications/cohabitation-marriage-relationship-stability-and-child-outcomes-update> (Accessed: 09/06/2023)

<sup>51</sup> Ibid at 14

<sup>52</sup> Ibid

<sup>53</sup> Ibid

## 1.6. Ofgem Consumer Vulnerability Strategy

Ofgem is the public body responsible for overseeing the energy market in the UK to protect consumer interests.<sup>54</sup> Part of their fulfilment of this role is their Consumer Vulnerability strategy. This is updated every few years and their 2025 strategy was published in late 2019. Ofgem defines vulnerability as when a consumer's personal circumstances and characteristics combine with aspects of the market to create situations where they are significantly less able than a typical domestic consumer to protect or represent his or her interests; and/ or significantly more likely than a typical domestic consumer to suffer detriment or that detriment is more likely to be more substantial.<sup>55</sup> The strategy intentionally maintains a broad definition of vulnerability as they recognise that vulnerability can arise from a wide range of factors. However, mental and physical health, low income and age are highlighted as vulnerabilities in the strategy. More specifically, the strategy discusses the barriers to those with mental health conditions receiving support from their supplier and they noted they will be looking at research from the likes of Citizens Advice and the Money and Mental Health Policy Institute into the barriers for consumer's self-reporting vulnerable situations to their supplier.<sup>56</sup>

A range of specific issues to address are identified throughout the strategy. One issue identified is that not all companies are taking sufficient steps to identify vulnerability and treat these customers fairly. Ofgem want companies to demonstrate effective steps they have taken to understand consumer needs better and how they have translated them into positive outcomes for those at risk. They also identified that smaller suppliers and new entrants show a poor understanding of vulnerability. Going forward, companies entering the market are expected to understand vulnerability and tell Ofgem how they expect to ensure consumers in vulnerable situations are not disadvantaged. They also want to see greater transparency of energy provider's performance in supporting consumers in vulnerable situations, as vulnerable consumers may be reluctant to switch due to a lack of

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<sup>54</sup> Our role and Responsibilities (no date) Ofgem. Available at: <https://www.ofgem.gov.uk/about-us/our-role-and-responsibilities> (Accessed: 12/05/2023).

<sup>55</sup> Ibid at 28

<sup>56</sup> Ibid

information on support services<sup>57</sup>. Ofgem are working with the Energy Ombudsman and Citizens Advice to collect and share data to form a strategic approach to this. They also identified several areas of immediate focus such as creating an analytical framework to consistently assess the impact of Ofgem policies, strengthen protections for consumers who self-disconnect from their pre-pay meters, and proposing a requirement on gas network companies to adhere to a vulnerability principle, similar to the obligation that they have placed on gas and electricity suppliers<sup>58</sup>.

While the strategy is important in helping vulnerable consumers, there are some areas for concern. The most obvious short coming of the strategy is that it was published prior to the Covid-19 pandemic. The strategy isn't set to be updated until 2025 and as a result does not address the substantial negative impact the pandemic had on household finances and the rapidly increasing energy bills the UK is currently facing, especially since Russia's invasion of Ukraine<sup>59</sup>. While there has been attempts to address this in other areas, such as energy price caps, the strategy cannot be considered comprehensive without being updated to actively represent the economic and political climate the country is currently facing.

A further issue is the emphasis still being placed on self-reporting. The strategy seeks to encourage more people to self-report any vulnerabilities to their supplier. While making self-reporting more accessible is a good thing, a reliance on self-reporting in order to address a consumer's vulnerabilities will lead to many people being left behind, without help. For example, it was previously discussed how older consumers are more likely to cut back on other necessary expenses in order to pay for energy rather than seeking assistance. Reliance on self-reporting is also detrimental to those with mental health conditions as they may not feel comfortable discussing the matter with their supplier or feel comfortable using main communication methods, such as telephone or email, in order to facilitate these discussions. While improvements in regard to self-reporting would be welcomed, looking at a wider range of strategies to identify vulnerable consumers is necessary.

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<sup>57</sup> Ibid

<sup>58</sup> Ibid

<sup>59</sup> Russia-Ukraine and UK energy: Factsheet (2022) GOV.UK. Available at: <https://www.gov.uk/government/news/russia-ukraine-and-uk-energy-factsheet> (Accessed: 30/06/2023).



While the acknowledgement of issues such as health conditions, low income and age show an understanding of the specific risk factors of fuel poverty, other risk factors such as housing status and household type are not addressed. It has been identified previously in this report that people in the private and socially rented sector are at an increased risk of being fuel poor compared to owner-occupiers and are more likely to reside in energy inefficient homes. Furthermore, the strategies discussion of age related vulnerability focuses on older people and age related health concerns. This completely overlooks how younger working age people are one of the age groups most likely to seek advice on fuel poverty-related concerns and are one of the most disengaged groups from the energy market. As well as this, the focus on age related health concerns completely neglects a discussion about older people who do not have a disability or health condition but are still struggling to afford their energy bills. While the definition of vulnerability is kept broad due to many factors potentially causing vulnerability, the specific concerns looked at do not go far enough to address the vulnerabilities of fuel poor households.

## 2. How can Clients be Better Supported by Energy Suppliers?

### 2.1. Customer Friendly Communications

Ofgem Standards of Conduct are enforceable, broad, principle-based rules that apply across a range of supplier activities. They highlight the fundamental expectations regarding how suppliers must ensure each customer is treated fairly. These principles relate to how suppliers behave, provide information and carry out customer service processes.<sup>60</sup>

However, multiple clients involved in this project reported having difficulty understanding information from their supplier and experiencing intimidation and harassment when it came to debt collection. One client came to us as they struggle to understand the information they receive from their supplier and needed assistance from the bureau with this. Another client came to us as they were experiencing continual harassment from their supplier over outstanding fuel debt. The client reported that both themselves and multiple members of the household had disabilities and health conditions, and as a result the household was highly vulnerable. Despite this, they had been continually harassed by company representatives attending their home and demanding payment.

Ofgem carried out a study to look at how the tone of energy debt communications impacted the response of the recipient<sup>61</sup>. This study found that energy debt communications that are harsher in tone and focus on encouraging immediate repayment of debt do not increase intentions to engage with energy suppliers. In fact, engagement levels may be lower when compared to communications that were considered to be friendlier in tone and focused on the availability of alternative debt solutions. Harsh, immediate payment-focused communications performed worse in measures to determine whether a supplier would meet Ofgem's core outcomes for effective debt communication. They also resulted in reduced objective comprehension of key information and were less likely to be read in full. Customers who received the harsh communication example reported being left feeling threatened or scared. Whereas communications using empathetic language, made key information more visually prominent, and focused on alternative solutions rather than

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<sup>60</sup> Ofgem (21<sup>st</sup> February 2019) Standards of Conduct, Ofgem. Available at: <https://www.ofgem.gov.uk/publications/licence-guide-standards-conduct> (Accessed: 08/05/2023)

<sup>61</sup> Cameron Belton (21<sup>st</sup> October 2021) Debt Communications Messaging: Evidence from customer and behavioural insights, Ofgem. Available at: <https://www.ofgem.gov.uk/publications/debt-communications-messaging-evidence-customer-and-behavioural-insights> (Accessed: 12/05/2023)

immediate repayment were deemed to be examples of good practice. Therefore, it was concluded that using a disproportionately strong or threatening tone is not conducive to increasing customer engagement, rather, it is more likely to cause a negative emotional impact, such as worry or feeling threatened.

These findings are in line with the response we've recorded to harsh and intimidating communications from energy suppliers. Going forward, a more empathetic approach to communicating with consumers, with language that is easy to understand, would be a far more effective way for suppliers to communicate with their customers and in turn, may encourage them to seek help from their supplier if experiencing a vulnerability of some form.

## **2.2. Identification of Vulnerable Consumers**

Suppliers have a range of support in place to assist vulnerable consumers, such as their priority services register which is available to people with mental health conditions, those who have difficulty topping up their pre-payment meter, and those who have young children etc. However, many vulnerable consumers who may be eligible for this additional support are never identified as access often hinges on self-reporting. The Money and Mental Health Policy Institute report that many people experiencing mental health problems never tell their essential services providers that they are struggling with a health condition<sup>62</sup>. This can be for a variety of factors such as stigma or discrimination, they aren't aware that extra help is available, or they had a poor experience with disclosure in the past. Therefore, a reliance on self-reporting may mean that many vulnerable consumers go without any additional assistance. Even for those who do opt to self-report, assistance is not always made available. One client seen throughout the course of the project authorised us to disclose they were struggling mentally as a result of the harassment for repayment they were experiencing from their supplier. The issue was believed to have been rectified, however harassment from recovery agencies continued after their fuel direct payments were refused.

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<sup>62</sup> Katie Evans (April 2019) Minimum Standards for Mental Health, Money and Mental Health Policy Institute. Available at: <https://www.moneyandmentalhealth.org/wp-content/uploads/2019/04/Minimum-standards-for-mental-health-policy-note.pdf> (Accessed: 15/05/2023)

An increased promotion of support schemes available from suppliers and further work to ensure that anyone who does disclose any mental health conditions does receive this support would be a significant step in the right direction. However, support should not be entirely based on self-reporting. The Money and Mental Health Policy Institute suggest the introduction of minimum standards for mental health such as a requirement to offer appropriate support when a consumer does self-report but also ensuring their services are accessible to all people with a mental health condition, regardless of whether they opt to disclose or not<sup>63</sup>. To improve identification of vulnerable consumers without a dependency on self-reporting, Ofgem have suggested further utilisation of data sharing and cross-agency collaboration. This is an idea already being utilised in other countries, such as New Zealand, whose integrated data infrastructure links health data to other data sources such as tax, education, welfare and housing<sup>64</sup>. This is a concept which is already in the process of being implemented in the UK, with energy and water companies working together to signpost one another's support services for customers. In January 2018, United Utilities and Electricity North-West launched a pilot vulnerability data sharing programme in their area using live customer data<sup>65</sup>. Further and expanded utilisation of data sharing increases the ability of suppliers to identify vulnerable consumers, therefore allowing for early intervention to reduce the chances of a household falling into fuel poverty and removing the necessity for vulnerable consumers to self-report in order to receive help.

### **2.3. Fuel Poverty Schemes**

There are a range of different schemes available from energy suppliers to assist with energy bills. These are schemes such as the Warm Home Discount, which is a fixed rebate of £150 paid primarily on to the electricity account of those in the core group and the broader group. Payment within the core group is automatic as a result of data matching with the Department for Work and Pensions (DWP) to those receiving the guarantee element of pension credit. The broader group operates on a first come, first served basis with applications opening at varying points, dependent on supplier, every winter. Suppliers are

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<sup>63</sup> Ibid

<sup>64</sup> Ibid at 4

<sup>65</sup> UKRN (2017) Making Better use of Data: Identifying Customers in Vulnerable Situations, UKRN. Available at: <https://ukrn.org.uk/making-better-use-of-data-identifying-customers-in-vulnerable-situations/> (Accessed: 26/06/2023)

obligated to participate in the scheme when their customer base surpasses a certain threshold, with this threshold set at 150 thousand in 2020/21<sup>66</sup>.

A study by CAS found that an estimated 229,938 households received the Warm Home Discount in Scotland in 2018. This represents 9.3% of Scottish households. However, the research estimated that between 29% and 32% of Scottish households were eligible for the Warm Home Discount (WHD). Therefore, less than a third of eligible households received the rebate. Furthermore, the households in Scotland that are considered to be fuel poor and the households that are eligible for the rebate do not necessarily align. 34.5% of single working age households were classed as fuel poor but not WHD eligible. On the other hand, 59.9% of single pensioners were classed as WHD eligible but not fuel poor<sup>67</sup>. This is mainly due to the fact that many pensioners are in receipt of qualifying benefits such as pension credit, where as many in the single working age group are on a low income but are just beyond the threshold for many means tested benefits. Even for those who are receiving a means tested benefit, this may not be enough for them to be eligible for the rebate. Applicants to the broader group are required to evidence that they meet their supplier's criteria, which is likely to include proof of receiving a benefit that supplements low income and details of their household composition. Of the eight suppliers sampled in the study, there is a variability as to which benefits are deemed eligible for the broader group<sup>68</sup>. This means that a household's eligibility for the rebate is heavily influenced by which supplier they are with. Furthermore, due to operating on a first come, first served basis and suppliers opening for applications at different times, there is a risk that even those who do meet the eligibility for their supplier's rebate may still miss out. Those with physical or mental health conditions were also critical of how the scheme is advertised and administered due to a lack of assistance available from the supplier to complete the application, and the fact that there

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<sup>66</sup> Michael O'Brien (July 2020) Mind the Fuel Poverty Gap: Warm Home Discount in the Scottish Context, Citizens Advice Scotland. Available at: <https://www.cas.org.uk/publications/mind-fuel-poverty-gap-warm-home-discount-scottish-context#:~:text=This%20report%20examines%20the%20effectiveness%20of%20Warm%20Home,for%20CAS%2C%20and%20makes%20a%20series%20of%20recommendations.> (Accessed 12/05/2023)

<sup>67</sup> Ibid

<sup>68</sup> Ibid

is no way to apply with a paper form, meaning those who are digitally excluded will also miss out.<sup>69</sup>

Throughout the duration of this project, the bureau has done a lot of work to increase awareness of the Warm Home Discount and to encourage clients to apply, either by themselves or with assistance from an adviser. Many clients reported that they intended to apply for the rebate following a 1 to 1 session with an adviser or were assisted in the bureau to complete an application. However work by suppliers is also required to increase the number of people benefiting from the scheme. Going forward, to increase the benefit of the scheme, suppliers should look to improving access to the application process, revising the eligibility for the broader group in order to encompass more fuel poor households and expanding the scheme so more fuel poor households may receive the rebate.

#### 2.4. Addressing Digital Barriers

In their Vulnerability Strategy, Ofgem identified that 21% of adults in the UK do not have basic digital skills<sup>70</sup>. Despite this, a significant proportion of communications from suppliers and switching related activity take place online. This means that many consumers in the UK do not have the same level of access as everyone else. For example, one client spoken to during the project discussed how they rarely receive physical bills from their supplier, with the majority of communications going to their email. This presented an issue as this email was rarely checked due to the client not feeling confident accessing the internet and digital services.

As prior discussed, digital exclusion was a substantial barrier for older age groups. Many older people were not confident accessing digital services. Some reported having to rely on a trusted person, such as a family member to assist them with navigating this<sup>71</sup>. Across all age groups, the University of Bristol reported that security was the biggest issue with digital access. Many of those surveyed reported they feared the potential for fraud, and it was found that the pressure to be online may be leading to consumers becoming vulnerable as a result of poor digital security<sup>72</sup>. These concerns are a direct barrier to accessing price

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<sup>69</sup> Ibid

<sup>70</sup> Ibid at 28

<sup>71</sup> Ibid at 23

<sup>72</sup> Ibid

comparison sites or information about switching. Furthermore, online only applications for assistance schemes prevented groups, such as older people who are digitally excluded and those who cannot afford a device which accesses the internet, from applying, despite these being some of the groups who may benefit most from this assistance.

Going forward, a move to suppliers tailoring their communication method to the preference of the consumer rather than focusing on online communications could see significant improvements for those who are digitally excluded. This would allow them to communicate effectively with their supplier and increase their ability to access support and assistance.

### 3. Project Outcomes

Over the course of the project, we have empowered our clients to manage their energy more effectively, provided energy saving advice, and assisted clients with fuel debt. This has been achieved through telephone calls, face to face appointments and home visits, once Covid restrictions permitted this. Clients were provided with holistic advice and offered ongoing support with their energy issues if this was required. We also worked closely with local organisations to reach vulnerable clients through group sessions and continued to build on relationships with partner organisations.

Over the course of the project we reached 1708 households with energy advice. We also saw financial gains that could be directly attributed to the project of £217,867. This provided a substantial boost to both our vulnerable clients as well as the local economy. This was achieved through debt write-off or reductions, energy efficiency methods, application to the Warm Home Discount scheme, and advising on benefits that clients were entitled to but had not claimed. As well as this, the estimated annual energy bill savings from advice given totals £1751. The assistance and advice provided to clients resulted in an improvement in their mental health and wellbeing, with 89.7% of clients surveyed saying they saw an improvement in their peace of mind. The advice and support given also empowered clients to manage their energy effectively, with 79.5% of survey respondents seeing an improvement in their ability to help themselves and 80.8% reporting an improvement in their ability to save energy in their home. The impact of the financial gains made by the project were undeniable. Out of the survey respondents who had fuel debts, they reported being able to better manage their fuel debts and many saw their debts reduced or eliminated. A full copy of the survey results can be found in appendix one. Overall, it is clear to see that the clients we saw benefited from the project, with high financial gains and improvements in client wellbeing.

There were some barriers faced during the project, the most significant of these being the Covid-19 pandemic. To combat this, the project was initially delivered through telephone or email, with group sessions being delivered over zoom. Once we were able to re-open to the public, we took every precaution recommended to ensure the bureau was a Covid free space. The number of clients permitted in the waiting area was restricted and the interview



rooms and equipment were regularly sanitised, meaning clients felt safer and more confident in attending the bureau in person.

There were also some issues with contacting suppliers in relation to discussing client's accounts. There were issues with suppliers not responding to initial phone calls or emails, which delayed the resolution of some cases. This was combatted by continued communication with suppliers, which meant cases did not go unnoticed for long periods of time. A further issue was being able to discuss cases with the case handler. Some suppliers were not accepting written permission mandates and instead wanted verbal permission from the client for us to be able to speak on the client's behalf, which in some cases were not possible due to a client's health. This was resolved by having dedicated CAB contact numbers and email addresses for majority of suppliers, which made it far easier to communicate with them and will be highly beneficial to our advice service going forward.

Following on from the project, our advisers and volunteers will continue to assist clients with energy issues as part of the holistic advice service. We will also continue to communicate with suppliers on behalf of clients using the dedicated telephone numbers and email addresses that were established during the project. We aim to build on the knowledge and success of the LEAP project, continuing to tackle fuel poverty-related issues in Clackmannanshire.

## Conclusion

Overall, the LEAP project has been a success at tackling fuel poverty in Clackmannanshire. We saw significant financial gains for clients as well as empowering them to manage their energy bills and consumption. Throughout the course of the project we also identified a range of vulnerabilities in relation to fuel-poverty related issues, such as age, housing status and health. These trends were also identified on a national scale, with previous research by Citizens Advice Scotland, Scope and many others noting similar vulnerabilities across Scotland and the UK. Identification of these vulnerabilities provides us with a broader understanding of fuel poverty and allows us to take a more multifaceted approach to addressing the issue. Ofgem also notes many of these vulnerabilities in their Consumer Vulnerability Strategy, which is key in addressing vulnerabilities at a national level. However there were some shortcomings identified, such as relying on self-reporting to access additional support and no update being issued to reflect current socio-economic issues such as the Covid-19 pandemic and Russia's invasion of Ukraine.

Through discussions with clients and broader research from other sources, ways that suppliers could improve the experience of their customers were also identified. These were issues such as reliance on people with health conditions self-reporting in order to receive support from their supplier, digital exclusion of vulnerable groups, and the accessibility of fuel poverty schemes such as the Warm Home Discount. These are issues we can help to address through our advice service, for example assisting clients to complete online applications for the Warm Home Discount and communicating with suppliers when clients do not feel able to do so.

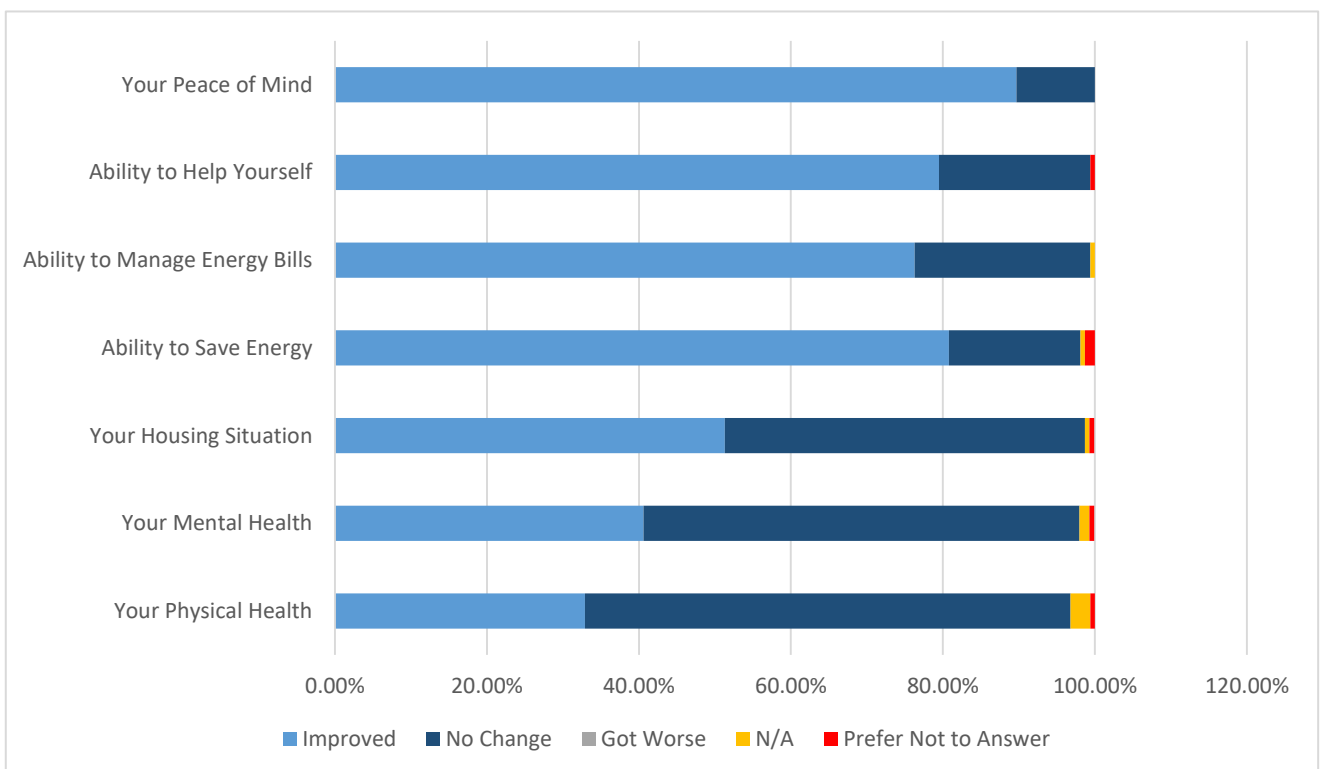
A lot has been learned from the project and there are many aspects of this which can improve our advice service going forward. For example, continued utilisation of dedicated telephone and email contacts with suppliers will allow us to assist clients quicker and more effectively. Using these outcomes and achievements, we hope to continue to assist our clients with any energy related issues and in turn help to tackle fuel poverty in Clackmannanshire.

### Appendix One: Client Exit Survey

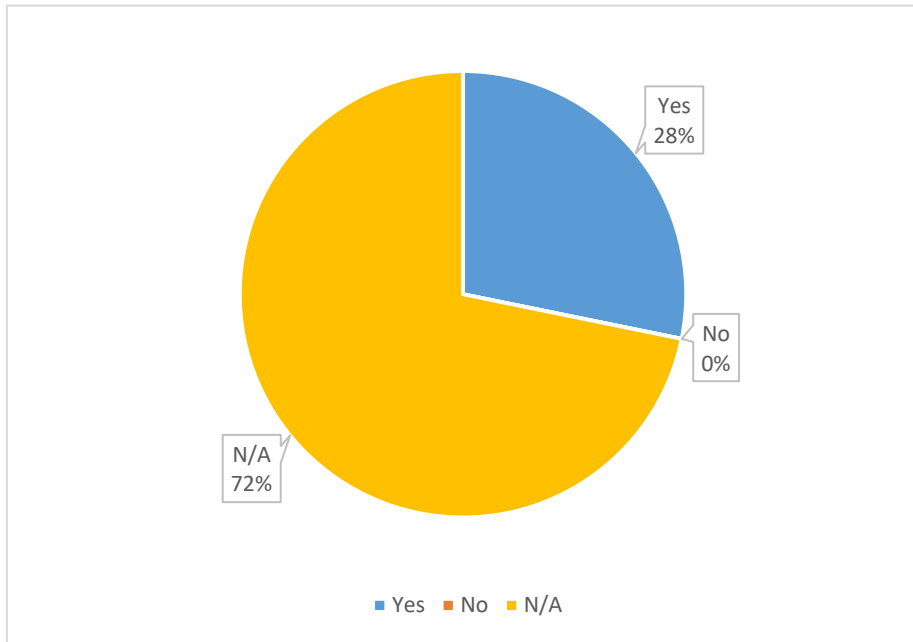
1. How would you rate the service and support you have received?

How They Rated the Service	Number of Respondents
<b>Very Good</b>	<b>87</b>
<b>Good</b>	<b>68</b>
<b>Okay</b>	<b>1</b>
<b>Poor</b>	<b>0</b>
<b>Very Poor</b>	<b>0</b>
<b>Prefer not to Answer</b>	<b>0</b>

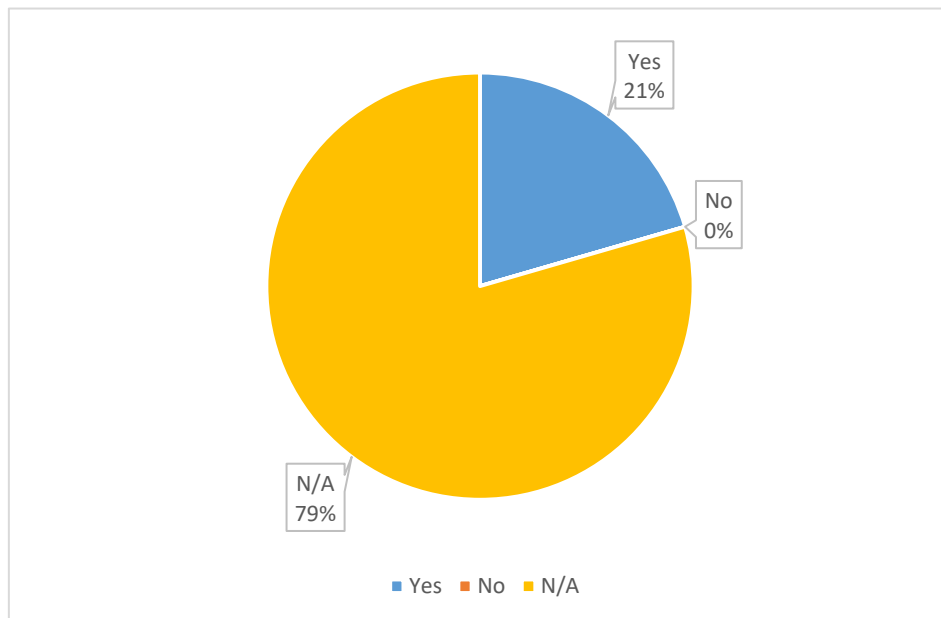
2. Thinking about the advice/ support you were given, what difference has it made to...



3. Do you feel better able to manage your fuel debts after seeking advice?



4. If you had fuel debt before receiving advice, are these fuel debts now reduced or eliminated?



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