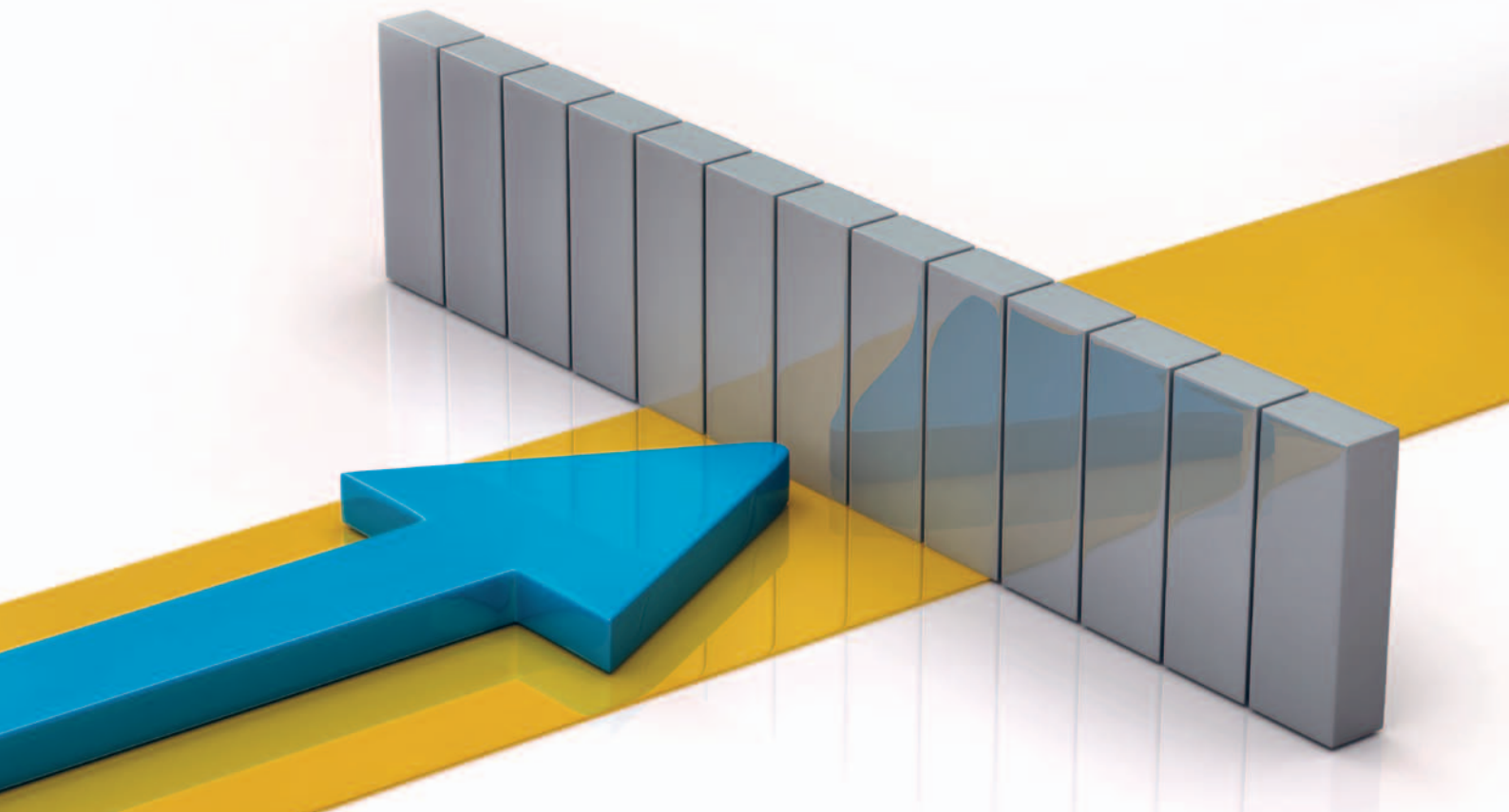


CENTRE FOR CONSUMERS AND ESSENTIAL SERVICES

Too many hurdles: information and advice barriers in the energy market



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Summary and recommendations

Many people are at risk of being vulnerable because of personal circumstances but also as a result of policies and suppliers' practices. So it is vital that everyone's information, advice and support needs are met, especially in the fast-changing and complex energy market. But instead there are serious barriers in getting the help people need, especially those in difficult situations. Comprehensive changes in policies and practices are urgently needed.

This study focused on the needs of vulnerable consumers and found that they frequently face multiple barriers in accessing information, advice and support in this essential service. It explores the factors that contribute to these barriers, including those arising from both personal circumstances and organisational behaviour. The study aims to help improve policies and practices in the energy sector so that they reflect the reality of people's needs. Identifying such barriers helps to point the way to practical solutions, in particular how organisations can ensure that their policies and practices are tailored to meet people's needs.

Methodology

The study was based on a literature review of research and other material from the energy sector and elsewhere. The key findings from the review were explored in interviews with a selection of organisations which advise people in vulnerable circumstances. The purpose was to gain a qualitative picture of the range of people's needs and difficulties faced. The recommendations are based on the findings of the literature review and the interviews.

The challenging energy landscape

The study highlights the increasingly challenging and complex nature of the energy sector and rises in fuel poverty. Consumers have had to deal with significant price rises with further increases on the way. They have to navigate what is frequently a confusing market, and the consequences of the wrong choice can be significant especially for those in vulnerable situations. These issues have contributed to a substantial level of mistrust amongst consumers of energy suppliers.

The study identifies other changes taking place - in the types of assistance available, consumer advocacy, and issues affecting complaints and redress: all of which will affect vulnerable consumers.

What do we mean by multiple barriers?

The study explored two key dimensions of difficulties which contribute to multiple barriers in accessing information, advice and support: people's

circumstances; and organisational policies and practices. It also looked at the interactions between these.

For example, carers are likely to be on low incomes and at greater risk of poor physical or mental health. Many people with literacy or numeracy problems, or mental health issues, are likely to be on a low income. But they may be worried about revealing their difficulties. Life events, such as job loss, bereavement or domestic violence, can erode people's self-confidence and make it difficult to cope with energy issues.

The other key dimension of difficulties relates to the policies and practices of energy suppliers. The following are among the barriers highlighted in the study:

- Automated telephone systems that are difficult to navigate with long menus
- Call centre staff using rigid scripts
- Costly telephone contact
- Bills and contracts that are hard to understand
- Systems that exclude people without internet access
- Lack of clear information about assistance schemes
- Inconsistencies in frontline staff knowledge or advice about support schemes and cheaper tariffs.

Too often, systems seem more geared to the needs of the organisation than those of consumers, and there is insufficient attention paid to the needs of people on low incomes and other vulnerable situations, compared with efforts to attract better-off customers. The study discusses how the effects are likely to be particularly damaging for people who are already experiencing other difficulties. These barriers also contribute to consumer distrust of energy companies and of the energy market.

Advice and information needs

The potential consequences of not having their information and advice needs met are likely to be much more serious for vulnerable consumers. One person's irritant may be someone else's serious problem.

The following emerged from this study as key information and advice needs that are likely to be of particular importance to consumers who face multiple barriers:

The costs of electricity and gas

People need information about what tariff they are on, whether it is the best one for them, and if not, how to find out what would be the most appropriate tariff. Clear information about cheaper tariffs and other forms of assistance is a critical need, and how to access help. A number of interviewees commented on the variable nature of help from suppliers,

including inconsistencies in the quality of information and advice from companies' staff.

Independent, accessible and understandable information needs to be available to those without internet access. But switching should not be seen as the overriding solution. People in vulnerable situations may have little confidence in the market and do not want to incur the risk of making the wrong decision. Also, they may not have access to information to compare offers easily, or may simply have enough to cope with already in their lives. It may also reflect the lack of suitable products in the energy market that meet their needs.

Information and advice about available payment methods is another crucial need. But also vulnerable consumers need to know that the method will suit their needs and not entail unnecessary risks.

Managing bills and consumption

People in vulnerable situations need easily accessible and understandable information about how arrears and bills can be managed without putting themselves at risk. Energy companies should take account of the needs of people with specific requirements, such as refugees or asylum seekers who may be unfamiliar with the domestic market, and people in rented accommodation who may not know who has responsibility for bills or arrears.

Access to trustworthy and understandable information and advice to help manage energy use is of crucial importance for many. This is especially the case for those with high essential energy needs, for instance, because of medical conditions that require constant heating or frequent clothes washing.

Easily understandable information and advice on energy management can cover a range of topics including:

- heating controls
- the energy consumption of appliances and products, and
- the availability and appropriateness of energy efficiency measures.

Appropriate and trusted assistance

Many people who are facing multiple difficulties may well prefer face-to-face advice. People with mobility problems may need information and advice through home visits, especially if they are not on the internet.

The study points out that, if people are facing multiple difficulties, they may well be reluctant to actively seek advice. This could be because they are isolated or stressed. Some people in difficult circumstances may feel embarrassed about seeking help. These factors underline the importance of ensuring that information, advice and support are easily accessible and sensitively provided. It is also vital to avoid making people feel stigmatised

or patronised, for example, by portraying older people as incapable of looking after themselves.

The need for people to feel comfortable with sources of information and advice about energy issues is another important theme. Cold calling to promote switching or energy efficiency may be welcomed by some but disliked by others because of perceived intrusion or lack of trust.

An important theme that emerged from the study was lack of trust in suppliers as sources of help. People may have had previous bad experiences or not want to disclose personal information to private companies. Some may be embarrassed or fearful of divulging difficulties such as literacy problems, mental health issues or hearing loss. Some interviewees reported problems in dealing with suppliers on behalf of clients, for example, when company staff insisted on speaking to clients who had communication difficulties.

Effective communication

Companies' communications systems often present unnecessary barriers, such as the use of costly telephone numbers. Other hurdles include voice-activated systems which present barriers for many especially those with speech difficulties, and call centre systems which can be difficult to navigate.

Effective information

The study recognises that a number of steps have been taken to try to improve the understandability of information on energy bills and more action is proposed by Ofgem. But more needs to be done to take proper account of people's differing needs. This includes looking at how energy consumption and costs are calculated and shown, clarity of formats and signposting to information and help.

People with sight loss or other impairments need access to information in a form which suits their needs. This includes the whole range of customer information, from bills to tariffs and energy efficiency help through to how to make a complaint.

Conclusion

Policies and practices in the energy sector should be based on an inclusive approach and an understanding of the broad nature and extent of consumer vulnerability. Such an approach reflects over-arching anti-discrimination and equality policies.

Recommendations

- The energy suppliers should adopt and implement the BSI standard on '*Inclusive service provision*' (BS 18477:2010) which sets out requirements for identifying and responding to consumer vulnerability.

- Frontline staff should be properly trained to identify triggers to indicate that customers are in vulnerable situations, to deal with people in difficulty, and also regularly trained in equalities legislation.
- Frontline staff should pro-actively provide full information on cheaper tariffs and assistance services, and signpost to independent sources of advice. The suppliers should ensure that their call centres and communications systems are user-friendly, eliminate long menus and provide easy access to direct contact.
- The energy suppliers should be required to:
 - provide freephone numbers to all consumers;
 - adopt an industry-wide `brand' name for Priority Service Registers, and proactively publicise these services;
 - provide clear information about the full range of tariffs with bills and Annual Statements, including cheaper tariffs;
 - agree to a protocol for their dealings with third parties acting on behalf of vulnerable consumers.
- The Department for Business, Skills and Innovation and Ofgem should ensure that there are effective systems at local level to provide consumers with easily accessible advice and support on energy issues, including provision for face-to-face advice. This should be backed up by properly resourced national advocacy arrangements.
- The Department of Energy and Climate Change (DECC) and the Department of Health should ensure that information on help with energy issues is available through health and social care professionals.
- Ofgem and/or Consumer Focus (subsequently Citizens Advice) should publish information for consumers on key topics, such as: what energy bills mean; how to get help; and services for people with specific needs. These should be available in a range of formats and languages, as well as printed and online. Ofgem should ensure that the fact sheets are widely available locally or that Consumer Focus is resourced to do so.
- Ofgem and the DECC should take action to improve the understandability of energy bills, taking full account of people's needs including sight, literacy and numeracy. Also, the terminology and calculations about energy pricing and use should be presented in ways that are easily understandable for all consumers.
- The Department of Business, Innovation and Skills and DECC should ensure that policy-making is based on an understanding of the broad nature and extent of consumer vulnerability. Impact assessments should state how this has been applied.

Part 1

1. Introduction

This report presents the findings of a research study for the eaga Charitable Trust on the needs of vulnerable consumers who face multiple barriers in accessing information, support and advice in energy services.

The objectives of the study were to:

- Examine the nature of the barriers faced by vulnerable consumers in accessing information, advice and support in energy services
- Help inform understanding of the factors that contribute to consumer vulnerability and multiple barriers
- Help to improve policies and practices in energy services

The findings of this study underline the need for policies and practices in this essential service to be geared towards meeting the range of people's needs, rather than creating unnecessary barriers and potentially contributing to the risk of consumer vulnerability. An inclusive approach is required which reflects over-arching anti-discrimination and equality policy frameworks.

Throughout the research, we sought to take account of the importance of the energy sector and of developments that are likely to have a significant impact on consumers, particularly those facing multiple difficulties. These include rising energy prices, the increasing complexity of this sector, and changes in assistance with energy costs and energy efficiency and in consumer advocacy arrangements.

These developments heighten the urgency of dismantling the barriers to accessing information, advice and support that affect many in vulnerable circumstances.

Approach to consumer vulnerability and multiple barriers

This research involves a number of related elements. It is based on a multi-dimensional approach to consumer vulnerability which recognises the wide range of potential contributory factors (see section 2). These include factors relating to people's personal circumstances which can be short or long-term in effect, and may also involve multiple difficulties. Other critical factors that contribute to consumers' risk of vulnerability stem from the policies and practices of markets and providers. The inter-action between these factors is of crucial importance.

We explore consumer vulnerability in relation to personal circumstances in greater detail in Part 2 of this report. The research shows how people's needs may be multiple or complex, rather than arising from a single causal

factor. It is vital to emphasise that the factors explored here are not intended to be exhaustive; nor should it be assumed that everyone in these circumstances is by definition 'vulnerable'. Instead, the intention is to illustrate the potential extent and range of risk factors and help to achieve a better understanding of consumer vulnerability.

Methodology and outline of report

The first stage of this study consisted of a review of research and other literature from the energy sector and wider sources. Topics covered in the literature review included an exploration of factors that contribute to consumer vulnerability (see section 2 and Part 2); and the information and advice needs of vulnerable consumers, and barriers to accessing advice and support (see section 3).

Key findings of the literature review were then discussed with a selection of advice agencies and other organisations who work with or advise people in vulnerable circumstances (see section 4 and Appendix 1). The intention was to obtain qualitative feedback on the initial findings, and to obtain a more comprehensive picture of the barriers faced by vulnerable consumers in accessing information, advice and support in the energy sector. Some of the organisations operate mainly in rural areas, others in urban areas; a number work with people whose first language is not English; some work mainly with older people or disabled people; some deal only or mainly with financial issues; and others focus on energy matters.

In order to gain as much relevant information as possible, the interviews were carried out on an anonymised basis and therefore the findings and comments in the report are not directly attributed to individual interviewees. The case studies were kindly provided by some interviewees and they too have been anonymised.

In section 5, we discuss key developments taking place in this already complicated and rapidly changing sector, which underline the importance of easily-accessible information, advice and support for people in vulnerable circumstances.

The results of the literature review and the interviews were used to inform the findings and recommendations, which are set out in the Research Summary at the beginning of this report.

2. Multiple dimensions of vulnerability

Understanding the factors that cause and contribute to consumer vulnerability is essential in order to identify and address the nature of barriers facing people in vulnerable circumstances in the energy sector.

‘Vulnerable consumers’ do not constitute a separate or static section of the population. Instead, there is a range of multi-dimensional factors which contribute to the risk of consumer vulnerability, and which may result in barriers for people in obtaining information, advice and support with energy services. These include factors arising from consumers’ individual circumstances and needs.

But the other critical driver relates to organisational behaviour, notably whether the policies and practices of suppliers meet the breadth of consumer needs or add to the risk of vulnerability. The inter-action between consumers’ needs and organisational behaviour is therefore of major importance.

2.1. Personal circumstances

Factors in an individual’s or household’s circumstances can increase the risk of them experiencing difficulties in dealing with markets providing essential services such as energy, particularly if people’s needs are not fully recognised or addressed adequately in public and corporate policies and practices. These are described as **risk factors**, namely that experiencing one or more of these types of circumstance can increase the risk of consumer vulnerability.

The risk of vulnerability may fluctuate according to changes in people’s circumstances at different periods of their lives or it can be long-term in effect. Some may be coping well but a sudden event, such as loss of income, onset of illness or bereavement, could place them at greater risk.

In addition, many consumers also have to deal with multiple factors that may be inter-linked. For example, Consumer Focus research (2010a) on vulnerable consumers and banking exclusion showed how consumer vulnerability can often involve multiple factors, for example:

- Those with mental health issues frequently experienced serious debt and housing problems
- Those with learning disabilities, migrant workers or those marginalised by lack of English faced a similar range of practical barriers, low financial capability and social isolation
- Disruptive life events frequently resulted in serious debt and even bankruptcy.

The ‘risk factor’ approach is therefore intended to recognise the potentially dynamic nature of vulnerability, and it underlines the need to avoid

stereotypical assumptions about ‘groups’ of people. A number of these factors are discussed in more detail in Part 2, together with some likely correlates between these factors and brief examples of potential barriers or difficulties that can result from the effects of individual circumstances.

It is also vital to recognise that there are many, possibly not obvious, factors which can impact on consumer vulnerability, for example, those associated with people’s life experiences, skills, and extent of social contact. These include, for instance, potential fear of stigma or discrimination because of numeracy or literacy problems or mental health issues. They also include ex-offenders and prisoners’ families who may be reluctant to reveal their circumstances because of fear of possible stigma.

The risks of consumer vulnerability are also influenced by factors such as people’s attitudes, experiences of dealing with provider organisations and markets, trust, and the degree of choices available. Key and obvious influences that affect - and circumscribe - the reality of choice available to people include: consumers’ level and security (or otherwise) of income, internet access, and the suitability, affordability and physical availability of services and products, as well as people’s life experiences, confidence and skills, and social contacts.

One, important but difficult to determine, factor concerns the level of people’s self-confidence and/or self esteem. There is considerable debate about what is meant by self-confidence and esteem, and about their relationship with people’s competencies and capabilities (see for example, Alexander, 2001 and Brown et al, 2001). It is not possible within this study to explore these complex issues in any depth. However, it is important to recognise that some people with low levels of self confidence may well encounter barriers in dealing with the essential yet potentially highly complex energy market. (See also Misztal, 2011)

CASE STUDY

Mr X was 80, had cancer and bone disease, Mrs X had diabetes, hypertension, high cholesterol and psoriatic arthritis. Mr X had dealt with all the main domestic financial issues. He was admitted to hospital, with no discharge date because his cancer is terminal. Mrs X, who had low self-confidence, then received fuel bills and was very tearful as she had no idea where the bank books were kept or what was paid into the bank, not even how much pension she received; also, she thought that there was a leak in the loft, and reported that the gas central heating was not working.

2.2 Markets and organisational practices

The other key dimension of difficulties involves factors relating to the policies, systems and practices of organisations, including those involved in the energy sector. These can present barriers to all, or some, consumers; for example, by making contact costly through the use of premium rate phone numbers, by providing information only or mainly through the internet, or by supplying difficult-to-understand information.

‘This is a fundamental dimension of disadvantage that is often overlooked or not given sufficient attention and acknowledgement. Instead disadvantage is seen all too frequently as relating solely or mostly to consumers’ situations, abilities or skills. Whilst these aspects of people’s lives are crucially important, common approaches to vulnerability or disadvantage can overlook the role of providers and let them off the hook.’
(George and Lennard, 2008)

The inter-actions between people’s own circumstances and needs and the policies and practices of provider organisations are critically important in contributing to consumer vulnerability. These factors also contribute to potential barriers for consumers in terms of access to information, advice and support. These have the potential to affect anyone but the effects are likely to be more serious for people who are in vulnerable circumstances.

BSI’s standard on *‘Inclusive service provision’* defines vulnerability as:

‘the condition in which a consumer is at greater risk of mis-selling, exploitation or being put at a disadvantage in terms of accessing or using a service, or in seeking redress’. (BS 18477:2010)

Whilst we discuss a range of circumstances that are likely to put consumers at greater risk of vulnerability, it should not be assumed that everyone in these situations is, by definition, vulnerable. The critical issues are the degree of risk of vulnerability and whether this is addressed or exacerbated by the actions or omissions of providers, markets and services.

Whilst there has been growing recognition amongst policy-makers, regulators and the energy sector of consumer vulnerability, their response frequently relies on setting up *‘special schemes’* to address specific needs. But, at the same time, another part of the organisation could well be creating barriers for consumers. The nature of such barriers is explored further in sections 3 and 4.

2.3 Constellations and interactions

As Citizens Advice has stated in its report on the need for inclusive services:

‘Vulnerability should be identified through understanding risk factors, awareness of behavioural triggers, and a recognition of the potential barriers cause by existing systems.’ (Citizens Advice, 2011)

The barriers that face people in vulnerable circumstances can, therefore, arise as a result of multiple difficulties that people face because of their individual situations, and the ways in which organisations and markets operate. From the research for this study, it is apparent that these inter-actions and their consequences have not received sufficient attention.

For example, the common combination of automated telephone tree systems and call centres can erect a wide variety of barriers for many people. Those which require the keying in of a long reference number, often without prior notice, are likely to be particularly troublesome for people who are under stress (for instance, as a result of bereavement) or whose fine motor control is not good, for example.

Poorly designed or poorly run systems can result in people not being able to get through or having to wait for a long time. And the telephone costs may be prohibitive for those without much money.

Similarly, as discussed previously, people can face multiple barriers if systems and practices do not meet their needs. For example, experiencing mental health issues is often associated with being unemployed, and also living in or at the margins of poverty. People in these circumstances may well be struggling with energy bills and in need of easily accessible information and advice, provided in ways which are geared to their needs.

Individuals experiencing a number of, often-associated, problems, such as loss of sight and/or hearing, depression, anxiety, and loss of physical or mental confidence, can and often do find it difficult to cope with many aspects of everyday life. This cumulative impact is often not recognised or, somewhat unhelpfully, described as ‘frailty’ or may be wrongly assumed to be evidence of some form of dementia, for example.

If the energy sector does not take proper account of the needs of consumers who are at risk of vulnerability, the result can involve exclusion from affordable access to services that are essential for everyday life and participation in society. The effects for those who are in vulnerable circumstances are likely to be especially serious, with significant risks of jeopardy to physical and mental health, and social and economic exclusion.

Conclusion

Given the ever-increasing complexity and importance of the energy sector, and the intensifying pressures from rising prices, it is essential that consumers are able to access relevant information and advice in order to help them to cope. Policies and practices employed in the energy sector need to address the many factors that may increase the risk of consumer vulnerability, and recognise that people may be experiencing multiple difficulties.

The types of barriers that consumers in vulnerable circumstances can encounter are explored further in sections 3 and 4 which set out respectively the findings from the literature review and from the interviews.

3. Information and advice needs and barriers: findings from literature review

A review of literature reveals a number of ways in which organisational systems and practices frequently get in the way of vulnerable consumers' being able to access much-needed information, advice and support. Many of these practice are not unique to the energy sector, for example, poorly designed call centres. However, other potential barriers relate directly to energy services, such as complexity of tariffs and hard-to-understand bills.

Overall, the findings from the literature review show how organisational behaviour can create multiple barriers for people who are already at risk of vulnerability with regard to such an essential service. This is highlighted further in the findings from the interviews for this research - see section 4.

3.1 Communication and information barriers

CASE STUDY

Ben, who is a profoundly Deaf sign language user living alone and reliant on benefits, tried to access an energy company when he received a letter from them which he was not able to read. Ben uses a minicom and using Text Direct (a relay service for deaf people) he tried to make contact but could not understand all the options that were given to him and, because they were automated, the time delay in using Text Direct meant that the call kept cutting off or going back to the beginning of the options. When he eventually got through to someone, they did not understand his message - as his first language is BSL this meant that his English was difficult to understand. This left Ben feeling upset, isolated, discriminated against and generally low. The advice worker was able to contact the provider at a later date and managed to resolve the issue but Ben told the advice worker that he would never attempt that again.

3.1.1 Communications systems and call centres

The communications systems and interfaces used by organisations such as energy suppliers can create a variety of barriers for consumers who are trying to access information, advice and support. Difficulties may include getting through to a call centre in the first place, navigating the system, and obtaining reliable information and relevant help. Telephone systems may also involve costly phone charges, particularly if people are faced with going through long menus or are kept on hold for lengthy periods.

In addition, many communications systems and call centre operations create barriers because they are not designed to meet the range of people's needs. For example, difficulty in dealing with call centres is a common problem for disabled people, according to research for Ofcom (see Ofcom website reference). Difficulties encountered included the following:

- Blind people reported that call centre workers assume that callers can see, and are unable to divert from the script - even when they

know that the customer cannot do what they are asking, such as reading a serial number

- Deaf people reported that call centres regularly hang up when they call via the text relay service
- Hard of hearing people said that requests to speak more slowly are often ignored
- People who have learning disabilities or have suffered a head injury said that they find menus and entering numbers difficult (for example, their account number)

CASE STUDY

Pam, who is moderately deaf and reliant on hearing aids and lip reading to communicate contacted an energy supplier to request information over the telephone. Because the call went to a call centre in another part of the country communication was very difficult for Pam, not only because of a strong accent but background noise in the call centre made it impossible to understand the operator. The response she got was one of impatience and in the end the operator hung up on her.

Systems that require the consumer to key in lengthy account or other numbers before being able to talk to someone can be distressing and present barriers, for example for people who are under stress, or have literacy or memory problems. Poor system design can also lead to confusion by not offering clear descriptions of each ‘branch’ of the phone tree or by imposing tight time constraints, requiring callers to make decisions more quickly than they may be able to manage.

“On calling the “customer service” number, the customer is asked to key in their mobile phone number. I can only assume that the person who implemented this procedure has never used a mobile telephone: a mobile telephone is generally a small self-contained unit, with a keypad that is somewhere between the mouthpiece and earpiece. It is usually used by holding the device to the ear. This tends to preclude use of the numeric keypad, except for those lucky few who have fingers growing out of their ears.

Having keyed in one’s telephone number and waited for an indeterminate length of time, one is then put through to an operator. Without fail, this person will then ask the caller to give their mobile telephone number (the same number as was just keyed in using one’s ear-fingers). It is almost inevitable that this person will not be able to assist directly, but will transfer the call to another person, who again requires the caller’s mobile telephone number. Sometimes, before being allowed to speak to this second person, an automated system demands that one first key in one’s mobile telephone number. Often the second person will not be able to deal with the query, and so (after keying in one’s mobile telephone number) the caller will have to tell a third operator what their mobile telephone number is and, hopefully, finally get an answer to their query.”

Source: www.sumption.org/2007/09/17/

Similarly, voice-activated systems can be a source of irritation for many - in a survey highlighted in an industry contact centre magazine, 41% of interviewees cited voice self-service as the most annoying communications channel, compared to only 1% who found it satisfying (see Call Centre Helper website reference).

For people with a speech impairment or other communication difficulty, such systems are likely to constitute a serious barrier. These may include - among others - many of the 900,000 plus people living in England who have had a stroke. Others who are likely to face difficulties or outright barriers in using voice-activated include those affected by stammering, which is estimated to affect around 459,000 adults in Britain.

A survey for Citizens Advice (2008) on people's experiences of calling government departments, utility companies, retailers and financial institutions found that utility companies' call centres remained the worst of the four surveyed (following a previous survey in 2004). As a result, Citizens Advice Bureaux are frequently asked to intervene because clients find it difficult and/or expensive to telephone suppliers themselves. As this survey also pointed out, having to navigate a succession of automated menus is likely to cause particularly acute difficulties for some people for whom English is not their first language, as well as people with hearing difficulties or those with mental health issues.

Specific sources of difficulties identified in the Citizens Advice research arose from:

- Time spent contacting utility companies, especially because of the time it can take to speak to an adviser
- Costs incurred in getting through to a utility company, particularly because of the use of non-geographic numbers, and the costs for people using a pay-as-you-go mobile
- The inability to get through to speak to someone because of automated systems and inflexible menu options
- Contact centre agents who are not empowered to resolve difficulties which can create additional hurdles, for example, people may have to repeat information or receive conflicting advice.

Further potential sources of difficulty arise from other features of call centres. For example, call centre operations are frequently run under contracts which require staff to 'deal' with each contact within a set time, regardless of consumers' needs. Similarly, tightly-defined 'scripts' for staff can restrict their ability to approach people's queries and problems 'in the round', with sensitivity and patience.

Other research findings underline how telephone systems can present major barriers for many people in difficult situations. These include research for the Department of Work and Pensions among customers with hearing impairments, speech impairments, learning difficulties, mental health issues and non-English speakers (Hay and Slater, 2007). The findings showed how telephone contact can be a complete or partial barrier for some, while others may be disempowered by telephony-based systems which cause stress or anxiety. Other research for the DWP health highlighted how telephone-based systems may be difficult or impossible to cope with for vulnerable pensioners experiencing disability and/or ill-health (Sykes et al, 2005).

3.1.2 Internet access

An increasingly important communication route is via the internet. Consequently, being on the ‘wrong’ side of the digital divide can add substantially to barriers for consumers who are facing multiple difficulties. Instead there needs to be a range of channels for people to access advice and support, including face-to-face support, as emphasised in the Citizens Advice report (2011) on the importance of inclusive services.

In the energy sector, internet access has become increasingly important as a means of accessing tariff information and cheaper deals. Research for Ofgem shows that internet access continues to be associated with higher levels of switching for both gas and electricity (IPSOS Mori, 2011). Other qualitative research for Ofgem among vulnerable consumers found that few visit websites to compare prices (FDS International, 2011).

However, there has been a large increase in the number of suppliers’ online tariffs, according to Ofgem’s retail market review, and the offline tariff of the major six suppliers has generally been above their online tariffs since 2008 (Ofgem, 2011a).

In general, although the numbers of people who use the internet have risen in recent years, 5.7 million households in Britain lacked internet access in 2011; and just over 8.7 million adults in the UK had never used it, over 17% of the adult population (Office for National Statistics, 2011a; 2011b).

Internet use still varies according to people’s circumstances, such as age and income. Although the percentage of low income households with internet access has risen over the years, only 55% of UK adults on a low income said they use the internet in 2011, compared with 89% in the ABC1 socio-economic group (Ofcom, 2011). Only 53% among those aged 65 to 74 and only 25% of those aged 75 and over said they use the internet, compared with 80% of UK adults aged 16+. Internet use among disabled people in the UK is 58% in 2011, which is also below the UK average.

3.1.3 Written information

Almost anyone can encounter barriers if they are faced with poorly designed and badly written information which is difficult or impossible to understand. The difficulties are likely to be especially acute if the information is presented in ways that do not meet people’s needs, such as those with sight loss or numeracy, literacy or language needs.

Research for Age UK (ILC-UK, 2010) showed the difficulties facing some older people in reading and understanding information and instruction material due to small print size and unclear language. The effects for people with significant sight problems in dealing with much written information were illustrated as well in an RNIB report (Kaye and Marriott, 2010). These include loss of independence and daily frustrations, including difficulty in everyday tasks such as shopping and paying bills. Not being able to access written information can have devastating results impacting on people’s health and sense of security, as well as being deeply frustrating.

Information and advice provision needs to take account of the range of people's language and literacy needs and how they are used to obtaining information. For example, research among older people from BME communities found that those who read English fluently did use printed leaflets. Where information was translated, they found it helpful as it made them aware of their entitlements (Zahno and Rao, 2008). However, most tended not to rely on printed information but on workers to interpret and tell them more about how to access services. Some of those who were more isolated tended not to use leaflets at all, relying instead almost totally on word of mouth. The less social contact outside the family a person had, the less information was sought.

The Zahon and Rao research also pointed out that some people cannot read their mother tongue, or their mother tongue is not a written language. Also, familiarity with the way that services and markets operate is also important - some people did not know to look for information even when it was available: *"We don't know what we don't know"*.

3.1.4 Energy bills

Despite extensive research and efforts over the years by Ofgem and consumer organisations, fundamental problems remain about the comprehensibility of written information in the energy sector, including consumers' bills.

For example, an omnibus survey for Consumer Focus (2010b) on consumers' understanding of bills and tariffs showed that 35 % of consumers did not understand their energy bills. Most people did not know which tariff they were on or how much they paid per unit. In general, older consumers were more likely than younger consumers to find energy bills easy to understand and to know which tariff they were on.

Subsequent qualitative research for Consumer Focus (2011a) found that many participants felt there was too much small print and too much information generally. The research also showed that people's own vocabulary concerning energy matters was almost always about cost rather than the amount of electricity or gas used. The term 'kilowatt hours' in itself was identified as a barrier to communication.

Lack of clarity in energy bills and other written communications can give rise to even greater barriers for people with literacy or numeracy difficulties. For example, research for Ofgem (Opinion Leader, 2009) showed that energy bills are generally harder to comprehend than other invoices for people with low literacy levels, such as phone bills. However, people with low literacy levels may also feel intimidated by suppliers and less likely to contact them directly with a query. Concerns were also raised in Ofgem's retail market review (Ofgem, 2011a) about what seemed to be unnecessarily high numeracy requirements of supplier communications, such as information on bills and annual statements.

Problems with the comprehensibility of energy bills and other information from suppliers also emerged in recent research findings for Ofgem in which numerous vulnerable customers said that they only really look at how much they had to pay and ignore messages on the bill or inserts (FDS International, 2011). Although some had tried to understand the bills, they really struggled to understand how their bill was made up, and supplier communications were of limited help.

3.1.5 Information about energy efficiency

Access to clear information about energy efficiency and eligibility for help schemes is another important matter for many consumers in vulnerable circumstances. However, a review of a number of studies by Palmer (2008) for eaga CT revealed deficiencies in attention paid to the provision, content or design of information leaflets with regard to older consumers and the public at large.¹ Poor layout and font size of written information in general were among the problems identified. A key finding was that energy efficiency information needs to be conveyed using concrete, 'everyday' language that put forward 'win-win' scenarios.

The findings from the Palmer review also emphasised the importance of recognising that people frequently have different needs even if they share common factors such as being older. For example, there can be important differences in the needs of 65-year-olds and of 85-year-olds, older people who are visually impaired, those who lack literacy skills, and those from minority ethnic communities. The need to involve older people in the writing, design, and monitoring of information was a recurring theme.

3.2 Coping with energy bills

Barriers to help in coping with energy bills include the ways in which cheaper deals are designed, which may well not meet the needs of people in vulnerable circumstances. However, even where tariffs and offers are specifically designed to help people on low incomes, consumers can face a range of difficulties in accessing reliable information and advice.

3.2.1 Bank accounts and direct debits

The cheapest energy deals are often linked to payment by direct debit, which therefore excludes people without a suitable bank account. Just over 1 million people in 2009/10 were 'unbanked' - that is, they did not have a transactional bank account which would allow direct debit payments, (Ellison et al, 2010; see also Finney and Kempson, 2009).

The types of multiple barriers that consumers can face in this regard are apparent from Consumer Focus research on banking exclusion (2010a). This identified a powerful relationship between being in a 'group' perceived as being marginalised and hard-to-reach and not having a bank account.

¹ The purpose was to investigate whether Scottish Government energy efficiency grant leaflets were successful in portraying information to those who were most vulnerable to fuel poverty, in this case, older householders.

While participants consisted of a diverse group of people in a wide range of circumstances, there were some strikingly common themes which indicated vulnerability. Few were in paid employment, incomes were extremely low, and many had serious debt problems. A high proportion were not receiving income they were entitled to, such as benefits payments. These included adults with mental health problems and non English-speaking migrants, and women fleeing domestic violence. Some were not receiving support and advice because they did not know about the existence of advice agencies.

Where people start using a bank account, those in potentially highly vulnerable circumstances may face additional risks, as this Consumer Focus research showed. For instance, adults with learning disabilities can find it more difficult to preserve independence or privacy, and they can also be at greater risk of fraud and identity theft.

Although cheaper energy deals are often linked to paying by direct debit, even those who have a bank account may prefer not to use this payment method. People on a low income may - understandably - prefer payment methods that are more expensive but offer greater control over budgeting (see, for example, research for the OFT by Europe Economics and the New Policy Institute, 2010). Direct debits are also resisted by many older people, particularly those over 70, because of fears about control and security (ILC-UK, 2010).

Similarly research by the Centre for Sustainable Energy for eaga CT (Anderson, White and Finney, 2010) on how people cope with low incomes and cold homes highlighted concerns about direct debit payment methods for energy charges. These included anxiety about the risks of getting estimated bills because of the importance of avoiding arrears when managing on a low income.

3.2.2 Pre-payment meters

In contrast, paying for energy through pre-payment meters (PPMs) is a popular payment method for many consumers as it can offer greater control over budgeting for energy costs. However, research findings demonstrate as well the potential disadvantages, and the diversity of opinions about this payment method (Anderson, White and Finney, 2010).

Consumer Focus research (2010c) also pointed out the popularity of PPMs but also a number of significant problems such as self-disconnection.² Around 16% of PPM users self-disconnect at least once a year affecting an estimated 1.4 million people, according to this research. Almost half of these households contained someone with an illness or disability. Worryingly, consumers who were self-disconnecting reported mixed experiences when trying to contact their supplier for assistance.

² Self-disconnection is defined as interruption to electricity or gas supply because the card or key has not been charged and inserted into the meter.

This research also revealed how self-disconnection and self-rationing can have significant consequences for people's health and wellbeing even if the disconnection is short-lived. Many respondents found it stressful, and for a few, it exacerbated existing depression. Moreover, some consumers resorted to going without heating or other essentials to ensure they could keep the meter topped up.

However, the Consumer Focus research found that some households who self-disconnected for extended periods should not have had a PPM in the first place. This was because they contained residents who could be classified as 'vulnerable' according to the ERA's 'safety net' (Energy Retail Association, undated). Subsequently Consumer Focus announced an agreement with the six major energy suppliers regarding PPM customers. This includes the need for suppliers to carry out a more detailed check for vulnerability before installing a PPM.³

Other difficulties identified in this Consumer Focus research included gaps in information about how PPMs work; perceived lack of information on outstanding debt repayments; and lack of options for topping-up PPMs. Concerns about some suppliers' practices when determining whether it is safe and practicable to fit a PPM, and also about the fitting of PPMs on Independent Gas Transporter networks, were also raised in a joint Ofgem and Consumer Focus review (Ofgem, 2010a).

Levels of repayment rates for PPM customers have been a matter of concern for some years. Although there has been a slight narrowing in the divergence between repayment rates for PPM and credit customers, Ofgem has raised concerns about some suppliers' PPM repayment rates. As Ofgem pointed out (2011b), the PPM customers of those suppliers were paying more per week on average than credit customers despite being more likely to be on low incomes.

Ofgem has identified key principles that suppliers should take into account regarding a customer's ability to pay, which appear to be starting to have an impact. But concerns remain, for example, Ofgem's annual report for 2010 on the suppliers' performance in terms of their social obligations reported that, with the exception of two major suppliers, each supplier's average weekly PPM repayment rate was higher than for credit customers for both electricity and gas (Ofgem, 2011c).

CASE STUDY

The client is a single man (over 50) living in an all electric single bed roomed housing association flat. In addition to mental health problems he has been classified by DWP as being severely disabled. His dispute with the energy supplier went back to 2005. Over this period his bills have averaged over £1200.00 per annum, which is above average for the size of property. To date they do not appear to have done anything to check the accuracy of his meters which he

³ The suppliers signed up to '5 key principles' aimed at helping to improve the way pre-payment works, provide extra support for vulnerable consumers and encourage better communication between suppliers and prepay users. (Consumer Focus press release, 11 March 2011)

believes to be incorrect. They have, however, deducted £838 for a period when they were late submitting bills (more than 12 months) for his separate off peak meter in addition to writing off a further £946 for reasons that are not yet understood.

Nevertheless, it is alleged that he still owes in excess of £3,000.00 and a pre-payment meter was installed last May to help him better manage the debt. The pre-payment meter has been set to recover debt at £3.00 a week (£7.00 a week before he challenged them), it takes £4.00 a week to cover estimated usage on the off peak meter and whatever is needed for actual usage of standard rate electricity. He is finding it extremely difficult to manage and is in continuous danger of self disconnecting. The supplier has a Trust Fund to which customers experiencing financial difficulties can apply. Before doing so customers have to agree to the amount to which they are indebted to the supplier. This is something the client cannot yet agree to and the debate continues. He finds the dispute stressful and explanations given by the company do not readily equate back to the bills they have provided.

3.2.3 Assistance from suppliers

Research findings also show how suppliers' practices can present significant barriers for people on low incomes in obtaining information and help when facing payment difficulties.

Qualitative research for Ofgem on customers who were new to debt (Creative Research, 2010) revealed the following:

- Considerable variability in terms of how suppliers were dealing with individual customers, including within the same supplier depending on which member of staff picks up the phone. Participants reported a lack of consistency amongst staff with the outcome often dependant on whom they spoke to. A number said that company advisors were “mechanical” and “emotionless” and a few described them as “just going through the motions”. One reported that they told the advisor that they were disabled but the advisor ignored the comment and continued to pursue full repayment of the debt.
- Neither suppliers nor respondents were proactive in making contact with the other party about the arrears. Even where there were warning signals (cancellations of direct debits, missed payments etc), there was no evidence that suppliers were acting on these.
- There was very little evidence of suppliers offering all of the potentially appropriate repayment methods to customers or that they were exploring with in any systematic way customers' ability to pay when calculating repayments.

Whilst the joint review by Ofgem and Consumer Focus (Ofgem, 2010a) of suppliers' approaches to debt management and prevention found that energy companies had made efforts to help consumers, it also raised a number of concerns. These included inconsistent approaches by suppliers to

understanding customers' circumstances and to offering an appropriate repayment level and payment method.

The inconsistency in suppliers' approaches applied not only across suppliers but within them depending on the approach taken by the individual customer service agent. The review also found that some suppliers' incentive mechanisms may lead staff to agree inappropriate payment plans or to put customers onto payment methods, which are unsuitable and may be in breach of licence conditions.

Other issues that emerged from this review included the need for Fuel Direct to be offered more readily by suppliers, and for more action to ensure there is early contact with those struggling to pay bills before the debt becomes unmanageable. Ofgem has also called for more to be done by most suppliers in terms of providing customers with written confirmation of repayment arrangements, and in monitoring of staff and of these arrangements (Ofgem, 2011c).

3.3 Information about tariffs and deals

3.3.1 Energy pricing

The use of complex pricing structures by suppliers has become a marked feature of the domestic energy market, and research findings have consistently demonstrated the difficulties that this practice creates for consumers.

Price complexity is a particular barrier for people in vulnerable circumstances who are trying to find the best deal, and it also serves to reinforce their distrust of the market. This is underlined by findings from recent qualitative research among vulnerable consumers for Ofgem which concluded that:

'There was a fairly widespread feeling that the complexity and range of tariffs offered was not to help the customers by offering them a wide choice, but to confuse the customer and make that choice more difficult.' (FDS International, 2011)

Evidence compiled by Ofgem in its retail market review (Ofgem, 2011a) demonstrated that domestic consumers find that individual tariffs are complex and difficult to understand, and also the multiplicity of different tariff options is confusing. (At the time of writing, Ofgem was considering what action to take to make it easier for consumers to compare prices, among other related issues. The Government has also announced that the energy suppliers have agreed in principle to signpost consumers to cheaper deals information this winter, and that bespoke information will be displayed on the bill itself by 2012.⁴)

⁴ Department of Energy and Climate Change, press release, 20 September 2012.

Complex and confusing price offers make it harder for consumers to be aware of their expenditure on energy, and put people off from searching for better tariffs, as Ofgem pointed out. The number of tariffs available stood at over 400 in October 2011 (Ofgem press release, 14 October 2011).

Research by the Office of Fair Trading (quoted by Ofgem in its retail market review, 2011a) suggested that complex pricing is more prevalent in energy retail than in many other sectors. Of the consumers who encountered complex pricing in energy, 75% objected to the way in which electricity and gas prices were presented and 61% found it difficult to choose an energy supplier (Office of Fair Trading, 2010).

3.3.2 The risks of switching

There has been a continuing heavy emphasis on placing the onus on consumers to obtain the best energy deal by switching tariffs, payment methods and suppliers. But the complexity of the market means that, for many people, this is by no means an easy thing to do. As a result, it is not a foregone conclusion that people who do switch will actually benefit financially. For example, Ofgem told a Parliamentary Committee inquiry recently that 40% of consumers who switched had changed to a weaker deal (House of Commons Energy and Climate Change Committee, 2011).

The risks of choosing the wrong tariff or deal and ending up in a worse position financially are likely to be especially serious for people who are in vulnerable situations, as highlighted in research by the Centre for Sustainable Energy for eaga CT (Anderson, White and Finney, 2010). Lack of transparency about real long-term costs was a key concern for low income consumers, which made it all but impossible to make a judgement about a specific deal. There was little confidence that switching would bring real rewards, as well as concern about unexpected costs that may ensue.

However, it is important to note that the reluctance to switch energy suppliers did not reflect a general unwillingness to shop around on the part of people in difficulties as a result of having to cope with low incomes and cold homes. As the CSE report stated: *'Low income households are typically smart consumers, keen to seek out the best prices and the best deals wherever they can'*, and this was clear in their engagement with the food market. The reasons for limited evidence of shopping around in energy services related mainly to the market itself: in general, the prices and deals on offer were perceived to be complex, opaque and untrustworthy.

Concern about the potential risks involved in switching suppliers also emerged as a key feature for many older people in other research for eaga CT (Attend Rights to Warmth, 2009), particularly because of uncertainty about the outcome and whether they would reap any benefit. It was also noted that, for those with internet access, the form and content of price comparison sites does not provide a mechanism to assess whether a previous decision to change supplier has actually saved a householder any money. A significant proportion of older participants believed that switching supplier had not saved them money.

Fear about the uncertainty of saving from switching was also reflected in the research among vulnerable consumers for Ofgem cited above (FDS International, 2011). The temporary nature of expected savings was among the disincentives - people were reluctant to switch to a supplier who, it was feared, would quickly raise their prices.

3.3.3 Fixed contracts and termination fees

Choosing the right deal can also be made more complicated as some involve fixed term contracts. These are often based on automatic rollover terms which allow suppliers to extend the duration of the contract or apply a new fixed term period. But consumers may well be subject to financial penalties if they want to terminate the contract before the end of the period. Also, when a fixed term pricing period finishes, consumers may automatically become subject to new pricing arrangements for another fixed period.

The effects of termination fees, and the risk of being trapped in an unsuitable and possibly unaffordable energy deal, are clearly likely to be of particular concern to people on low incomes, or who are otherwise at risk of vulnerability.

Ofgem's recent consultation on fixed term offers (Ofgem, 2011d) expressed particular concern that consumers are not being made fully aware of what will happen at the end of a fixed term offer, including information about early termination fees; automatic contract rollover terms; and price offers available to consumers following a fixed term period.

At the time of writing, Ofgem was considering what action to take on these and related issues and further consultations are due to take place. In its retail market review, Ofgem proposed various measures regarding contract terms, which include preventing suppliers from automatically rolling customers on to a new fixed term product without their express consent. In the meantime, recent modifications to standard licence conditions require suppliers to notify customers of any price increase or a unilateral contract variation that is of significant disadvantage to the customer.

3.3.4 Sales and marketing practices

Suppliers' marketing policies and practices continue to be a source of particular concern, especially as many potentially vulnerable consumers may be influenced by information from suppliers' agents calling at the door. Recent research for Ofgem underlined the continued critical importance of the role of doorstep selling in general (used by 29% of gas switchers and 28% of electricity switchers), and its particular importance for PPM customers, those aged over 65, and those without internet access (IPSOS Mori, 2011).

Also, consumers who sign up to energy deals on the doorstep may well be missing out on the cheapest deals. Ofgem's Energy Supply Probe (2008) found that around a third of switchers may not achieve a price reduction and this proportion was higher for consumers who switched as a result of a direct sales approach. This continues to be a source of concern. Consumer Focus has pointed out that the most competitively priced tariffs - that is

online direct debit deals - are not offered via doorstep sales (letter to Ofgem, 2 December 2010).

Consumer mistrust of doorstep energy marketing has become more widespread. A Consumer Focus survey in May 2011 found that 79 per cent of consumers have a negative view of doorstep sales by energy companies. Very few had positive views about energy sales via this channel, and hardly any of those surveyed viewed doorstep sales as a valid way to find out about a product or service (Consumer Focus, 2011b). Similarly, recent research for Ofgem involving a range of vulnerable consumers showed that there is considerable mistrust of energy sales representatives, and it also found some instances of fraudulent sales practices (FDS International, 2011).

In its report on Ofgem's retail market review, the House of Commons Energy and Climate Change Committee (2011) expressed concern that consumers may be pressured into switching supplier on the door step without proper consideration of the available options when confronted with a vast array of complex tariffs and a hard sell.

The Committee has called for further evidence that Ofgem is monitoring both the conduct of energy supplier sales staff and the areas that they target, and is taking firm action where it finds evidence of mis-selling or exploitation of vulnerable consumers on the doorstep. It concluded that:

'The level of tariff complexity that confronts consumers is unacceptable and the continued blight of misselling should have been taken in hand years ago. In particular the possibility that a large number of consumers may have paid too much for their electricity or gas because of mis-selling on the doorstep should be examined at once and compensation paid where consumers have been misled by agents acting for the suppliers. Ofgem needs to take much tighter control on these issues in order to give consumers the ability and confidence to take part in switching.'

* Consumer Focus is calling for an end to unsolicited doorstep sales in the home by energy companies. At the time of writing, five of the major suppliers had announced a suspension of doorstep sales; and Ofgem was investigating whether four of the major suppliers were complying with licence requirements regarding telephone and face-to-face sales activities.

3.4 Sources of advice

3.4.1 Advice needs

Research findings highlight the need for consumers to feel comfortable with sources of information and advice. For example, the study by Attend Rights to Warmth for eaga Charitable Trust (2009) showed not only that older people may not seek out sources of advice but also that they will not feel comfortable taking it from sources such as energy suppliers or local authorities. Those who were regularly cold were more likely than

respondents in general to be comfortable dealing with a charity such as Age Concern or Citizens Advice Bureau or health professionals.

Whether consumers seek advice in the first place can be a complex matter and it was not possible to explore this key issue in depth within this work. However, it is important to stress the need for people to have access to a range of channels, including face-to-face advice, as highlighted for example, in the Citizens Advice report on the importance of inclusive services (2011).

Research for the former Age Concern England (2007) also underlined this point. It demonstrated how internet-only advice services can exclude a very high proportion of vulnerable older people. The most common methods of contacting sources of help were in person; by phone only and by both phone and following up in person. (None of the isolated older people involved in the research had used internet-based form of contact compared to 17% of older people who were not isolated.)

More broadly, a study on the impact of debt advice on low income households (Orton, 2010) showed the importance of the 'someone to talk to' element of advice and continuity of provision, as well as advisers being understanding, non-judgemental and sympathetic.⁵ Another dimension of advice that interviewees found helpful was that of being given information and options. However, as the research also pointed out, it is important to avoid overwhelming people with information.

The importance of charities, voluntary and self-help organisations as general sources of help and support for pensioners with health problems or disabilities, emerged in past research for the DWP (Sykes et al, 2005). Important factors included the 'whole picture' perspective they tend to offer, as a one-stop shop for information and advice about a range of benefits, services and service providers. Another potential benefit was that some voluntary organisations will visit people at home, which can be crucially important for people with mobility problems.

Wider research on how people deal with law-related problems and the impact of a lack of legal capability also helps to shed light people's willingness to seek advice. An analysis of the English and Welsh Civil and Social Justice Survey⁶, for example, showed that a broad range of disadvantaged 'groups' were far more likely than others to not obtain advice, lack knowledge, and suffer adverse consequences (Balmer et al, 2010). Lone parents, people in high density accommodation, those renting publicly, those without academic qualifications and those on a low income were most likely to be at a disadvantage in advice-seeking, according to this

⁵ The report presents findings from Year 3 of a longitudinal six year study of the impact of debt advice on a group of low income households.

⁶ The CSJS is a large-scale face-to-face household survey of over 10,000 respondents' experience of, and response to a broad range of civil justice problems.

analysis. The youngest and oldest age groups (18-24 and 75+) had the lowest percentage in obtaining advice and the highest in doing nothing and handling problems alone.

3.4.2 Energy companies as sources of advice

Many consumers do not feel comfortable about approaching energy companies for advice and help, particularly due to high levels of consumer distrust of the suppliers and of the market in general.

Distrust of the energy suppliers was highlighted in Ofgem's retail market review (Ofgem, 2011a). Research for Consumer Focus on consumer views of energy bills found that reasons for high levels of distrust included weak customer relationships, complexity of tariff structure, recent price rises, and activities of energy salesmen (Ipsos MORI, 2010).

Unsurprisingly, a Consumer Confidence Index Survey for Consumer Focus had previously identified energy as the market people had least confidence in overall - for the second year running (Ipsos MORI, 2009)⁷. Consumers were also asked whether or not they felt at any particular disadvantage in any of the markets surveyed. Although differences in findings between markets were small in general, the gas and electricity market featured as one of three markets where the proportion feeling at a disadvantage was significantly higher.

CSE research cited above showed that interviewees felt they simply could not trust the market to work in their interests (Anderson, White and Finney, 2010). They would rather hold tight with a contract they knew they could manage than expose themselves to risk through switching suppliers for example. Although trust was not entirely absent from interviewees' dealings with energy companies, trust tended to be invested in established relationships with a supplier rather than in the market as a whole.

Consumer Focus research (2010c) among people who use pre-payment meters and who were self-disconnecting from energy supply showed that only one in five households had sought help or advice about their energy usage, costs or about disconnections. However, many participants said they would appreciate advice on ways to increase their energy efficiency and impartial information about energy tariffs.

Conclusion

The findings from the literature review show the continued existence of a spectrum of barriers for consumers, especially those in vulnerable circumstances, which prevent or hinder access to information, advice and support in energy services. These include communications systems which are not properly designed to meet people's needs and often add to people's difficulties by involving costly telephone charges.

⁷ The Consumer Confidence Index Survey examined people's perceptions of the goods and services they buy across 45 market sectors.

Other practices such as complex pricing structures and difficult-to-understand consumer information add to the risks of people choosing a tariff or deal which may well be unsuitable or unnecessarily expensive. In addition, inconsistencies in advice from frontline staff and widespread consumer distrust of energy suppliers are highly likely to be deterring many vulnerable consumers from approaching the companies for advice and information. Supplier organisations need to review how their own practices and systems impact on consumers and potentially increase the risk of vulnerability.

These and other issues are further explored in the next section, which presents the key findings from interviews with advisors and other relevant organisations.

4. Information and advice needs and barriers: findings from interviews

This section is based on the findings of interviews carried out with a selection of advice agencies and other organisations which work with or advise people in vulnerable circumstances (see Appendix 1). The primary intention was to build a more comprehensive picture of the barriers and difficulties faced by vulnerable consumers in accessing information, advice and support in the energy sector.

4.1 Suppliers' communications and information systems

4.1.1 Call centres

A number of interviewees highlighted difficulties with the ways in which call centres are run, and the problems that arise for many consumers in vulnerable situations.

Hanging on the phone

There can be long and expensive delays in being able to get through in the first place. Once through, people often feel they can't get anywhere with their query or problem, particularly with automated call centres which are difficult to navigate.

Telephone contact can be costly, especially for people on low incomes having to use premium rate numbers, often using up their credit on pay-as-you-go mobiles. Some clients have had their phones disconnected because of payment problems and need advisors to contact suppliers on their behalf.

Meeting people's needs

Telephone systems can be extremely problematic for people with acquired hearing loss. Automated options can be difficult to hear and change too quickly. An interviewee added that those with profound deafness usually cannot access call centre options using Minicom or textphone. In general, call centres are not user-friendly for people with hearing impairments and are often impossible to access.

When people do manage to speak to frontline staff, difficulties arise if there is a lot of background noise and/or the staff member has an accent that is hard to understand. Hearing aids do not necessarily solve the problem: face-to-face advice is often useful as people may be able to lipread. Some companies may offer to communicate via textphones but do not necessarily have trained staff to operate them. Also suppliers' staff may be unaware that these systems exist.

An interviewee highlighted particular problems that people with aphasia (and by extension other communication difficulties) can encounter with phone systems. For example, voice-activated phone systems can be extremely difficult for people with Aphasia to use. These systems often speak very quickly and the wording used is not always simple or in short

phrases. The interviewee commented that it would be much easier for someone with Aphasia if they could get through to a person immediately, or at least if the first automated option was specific for people who have communication difficulties so that the caller does not have to go through a whole menu of options.

4.1.2 Quality of information

Barriers in accessing information can affect people's ability to understand their bills, and also make it difficult to obtain relevant support and help.

Energy bills

Many interviewees emphasised that a wide range of people find energy bills difficult to understand (including some advisers). The range of difficulties that people encounter include problems in understanding how consumption is measured and what price they are paying for each unit consumed; knowing what the terminology means; and generally understanding how the energy sector works.

In addition, the 'small print' in bills can be too small for some people to be able to read. The prevalence of estimated bills was cited by many interviewees as a key source of confusion and distress among their clients, especially those in severe financial difficulties.

A number of interviewees maintained that much needs to be done to make energy bills understandable, for example for some people a visual representation would help them to understand and interpret the figures, so that they have a better understanding of their energy use. One interviewee argued that bills in different languages would be very helpful. She added that it would help if there more pictures on them - for people who have problems with English or with literacy/numeracy problems.

Some people with sight loss, for example, can face a range of difficulties, which means that they are not aware of the kind of support that is available, for example through social tariffs, priority services registers, and energy efficiency assistance.

People with sight loss cannot see adverts placed in national newspapers about discounts on bills and energy efficiency offers. The print in general leaflets is often too small for many people with sight problems to read and they can't read information displayed on posters. Information in alternative formats may be available but the person would probably need to know about this first to request it.

Also, for example, someone with Aphasia may be unable to read literature that comes through their door. Those who can read and write to some degree find it much easier if the information is set out in an Aphasia-friendly format. This would include the use of short sentences, bullet points, key words being highlighted, simple words and phrases and, most importantly, the use of symbols or pictures in place of words where appropriate. For example, a picture of a telephone next to the company

phone number or a picture of a calendar next to the date of an appointment.

4.1.3 Quality of help from frontline staff

A number of interviewees said that their clients find that there is a great deal of variation in the way that companies' staff respond, with some being very helpful, others not. Also, they find that different members of staff may proffer different answers (for example, about what tariffs would suit their client, and the maximum amount they are allowed to 'deduct' from people on PPMs who are in arrears). They felt that this lack of consistency is worrying and wanted the companies to address staff training and competence.

Barriers in accessing help also arise because of marked variations in what individual staff members are prepared to do to assist people who are in difficulties. For example, some do not even mention social tariffs and the eligibility criteria. Some interviewees remarked that sometimes staff do not even admit that there are social tariffs or wrongly assert that such tariffs no longer exist. In addition, companies often assume that people in payment difficulties are won't-payers when this is not the case (one interviewee added that the companies can take a lot of persuading about this).

4.1.4 Services for people with specific needs

Some services from energy suppliers were found by a number of interviewees to be not working very well in practice, for example the password scheme (part of the Priority Service Register). For example, one interviewee said that a number of their clients have registered a password with their energy company but, when someone visited to read their meter, the agent did not know the password.

Another interviewee pointed out that Priority Service Registers are often called different names by companies, and it can be difficult to obtain information about them as PSR services are not advertised widely, and frontline staff are often unfamiliar with them.

CASE STUDY

Miss S rang to tell us she registered a password with her energy company as she is partially sighted and can't read the identification badge, but in her experience the system doesn't work. Miss S has tried over many years to resolve this situation with her energy company but with no luck. Her energy company uses a different firm to read meters and suggested Miss S contacted this firm with the name of the person at her door, but this was very awkward for her to do. Miss S has now given up and has to let the meter reader into her home without the password which makes her feel very vulnerable.

Many interviewees maintained that quality and ease of communication varies from supplier to supplier, and that, for example, while there are lists of specialist phone numbers for people in difficulty, these are often not well-publicised. One interviewee pointed out that it can be difficult for many people to find any information because it is not easily accessible and

is often only accessed too late - after debts have accrued and a crisis point has been reached.

Also, the staff who are the first point of contact with an energy supplier are often unaware of the services the company provides for those who need specific services. One interviewee argued that companies' frontline staff need training in talking to people with hearing problems (for example, the need to avoid shouting). Companies need to use textphones and make sure they work and are well publicised.

4.1.5 Internet access

Some interviewees stressed the barriers that can be faced by those without Internet access. This includes not only many people who are on low incomes, but also some older people, and those in, mainly rural, areas who have difficulty in getting to public internet points, especially if they have mobility problems or lack access to transport.

One interviewee pointed out that information demanded by some comparison websites can present a barrier for some people, including those without a telephone. For instance, one client tried to use a comparison website to find out about switching energy suppliers but the website insisted on a telephone number being inserted. The client was profoundly deaf and did not have a phone. The interviewee commented that this insistence on a phone number is unnecessary, and that equality and anti-discrimination laws make it illegal to deny a service to someone with a disability unless there is a legitimate reason (it was thought that the website was probably harvesting phone numbers).

4.2. Coping with energy bills

4.2.1 Information about tariffs

A number of interviewees felt that in general there is a need to simplify price information, and for suppliers to provide information about all the forms of support that are available. One interviewee stressed this message also applies to companies' energy efficiency annual reports (which should report on their energy efficiency initiatives).

A fairly common problem encountered by interviewees was the basic lack of information that some people have about the tariff they are on. This seems to be especially likely to occur among people taking on a new tenancy where, for example, a previous tenant's tariff may be simply rolled over, even though it may not be the appropriate tariff for them.

Several interviewees also pointed out that many of their clients have taken on new tenancies without having much or any information about the previous tenant's situation or fuel supplier, and they often arrive in advisers' offices with large bills associated with estimated readings.

However, this sort of problem can occur easily in other types of accommodation. A lack of understanding, or confusion, about the different tariffs offered by different companies is quite commonplace, according to a number of interviewees. It can be difficult for people to find understandable information in the first place, and then be able to make a judgement about what tariff would be suitable or sustainable in the short to medium term. These difficulties are exacerbated by companies offering particular tariffs only for limited periods.

A number of interviewees also reported that many people find it difficult to understand tiered charging systems. Also, companies use different titles for their various tariffs and these can be confusing. In addition, there is often confusion relating to standing charges.

‘Energy pricing is not easily comprehensible or comparable: it is asking a lot of consumers to try to understand such a complex market’, as one interviewee commented.

4.2.2 Finding out about assistance

Lack of information seems to be particularly problematic with respect to social tariffs, according to interviewees.

For example, as one remarked:

‘The families we work with often aren’t aware that there are social tariffs, or what they are, or who is eligible. In part this is because people under stress don’t believe that it’s worth making any changes, including switching energy suppliers. Also, some family members don’t have reasonable literacy/numeracy skills.’

Finding out about cheaper/social tariffs can be difficult. As another interviewee put it:

‘Generally our clients know very little about social tariffs or cheaper tariffs and the eligibility criteria is not consistent across the energy companies. The majority of people who have sight loss are older and generally they have additional disabilities and difficulties, including hearing and communication problems, many are not computer users and so can’t go online to compare tariffs from different suppliers.’

Many of the interviewees felt that independent and informed advice on companies’ tariffs is difficult to obtain. For example, one maintained that price comparison websites do not generally include social tariffs at all. Others emphasised that many of their clients are not on the Internet. Some highlighted people’s problems with numeracy and literacy, allied to the complex and hard-to-understand tariff information that is available.

There was some concern about the lack of consistency among suppliers with regard to the eligibility criteria attached to social tariffs. An interviewee described how a number of couples in receipt of either Disability Living

Allowance or Attendance Allowance and means-tested benefits were refused a social tariff. This was because these benefits were counted as income by the supplier when calculating the maximum household income figure. The supplier also included housing/council tax benefit as income even though the person does not actually receive this money as net income. (The adviser is still trying to clarify the company's rationale for this decision.)

CASE STUDY

Kevin is registered blind and has cerebral palsy. He lives on his own in supported housing with the help of daily carers. Kevin is not working and receives Income Support and the maximum amount of Disability Living Allowance (DLA). Kevin spoke to his energy supplier about their social tariff but was turned down because his income was considered too high. His energy company count DLA and Attendance Allowance (AA) as "income". Kevin has many health problems and he receives the maximum rate of DLA which is spent on paying for his carers. He receives means-tested benefits so clearly is on a low income. He is not working and needs his heating on during the day and night and is struggling to cope with the rising cost of his fuel bills. It is unfair that someone like Kevin who is vulnerable and on means tested benefits does not qualify for the social tariff from his energy supplier, whereas ironically if he had less care needs and therefore was receiving less DLA he would be eligible.

4.2.3 Switching

As well as confusion arising from the complexity and/or inadequate information on companies' different tariffs, a few interviewees made the point that people who are experiencing a great deal of stress often do not feel able to make any changes in their energy tariff, or energy company.

As one interviewee remarked:

'Many find it's too complicated and difficult, especially people who are in vulnerable or difficult circumstances. Also, some people feel unable to consider switching because they're having to cope with multiple debts.'

Difficulties relating to switching suppliers were mentioned by several interviewees. One referred to the idea that the families they advise, who are under extreme financial and other stresses, should consider switching suppliers as 'ridiculous'. Others pointed out that it was impossible to make informed decisions about switching without having Internet access, something which was not available to many of their clients.

Two interviewees complained that, if relatives or an adviser tell their supplier that the person is vulnerable and needs to switch to a social tariff or a new supplier, the companies frequently say they can't do anything because of data protection concerns: an incorrect assumption on their part. Some interviewees pointed out that new tenants often face problems in trying to switch suppliers.

People's ability to switch supplier, or tariff, is - according to a number of interviewees - sometimes hampered by them being locked into long

contracts (which are not giving them the best deal), but at the same time they don't know how or why they are on such long term contracts. In addition, people can find themselves liable to a financial penalty if they switch before their contract ends, and this can come as an unwelcome surprise for people who are already dealing with multiple problems.

A couple of interviewees raised continuing problems concerning doorstep selling techniques, whereby vulnerable people in particular can be persuaded to switch, but to a company and tariff providing them with a worse deal.

Another interviewee mentioned cases involving people with mental health problems or learning difficulties who have found themselves with problems as a result of 'serial switching', leading to confusion, billing problems, etc. One case involved a person with learning difficulties who was paying twice for energy (they had switched as a result of doorstep selling). Her experience was that, in these situations, the companies have not been particularly interested in helping people out.

4.3 Debt and repayment issues

Many interviewees stressed how common it is for clients to have multiple debts - fuel debts are frequently accompanied by other debts and arrears, for example water charges, Council Tax, and overpaid tax credits. Also, these problems are frequently associated with housing issues, including the poor fabric of accommodation.

4.3.1 Difficulties in getting help

Some interviewees highlighted the difficulties encountered by clients who do not speak English very well, and find it hard to negotiate their way around in the energy field. Many are in arrears/in debt but did not know that they could arrange a repayment plan (suppliers did not necessarily explain this, or explain it well enough).

One interviewee highlighted what can happen to people with poor literacy/numeracy skills. The example concerned an older woman who was paying large amounts to her fuel supplier because she was actually sending them the amount of money for which she was in credit (which of course kept increasing). However, the supplier had not pointed this out. The adviser added that it is not uncommon for people to pay what they think are bills without understanding them at all. She argued that it is unrealistic to expect individuals and families already under great stress to try to understand and deal with these issues with the companies, who they may be fearful of contacting.

People's concerns about contacting energy suppliers were also highlighted by others. One interviewee said that people in energy debt may only contact the companies when the problem is serious, at which point they are

frequently referred to suppliers' debt teams, who are not necessarily interested in individual's circumstances and just want the debt repaid.

Problems were also reported in enabling people to get onto Fuel Direct.⁸ One interviewee explained that many companies, and the DWP, press for those in arrears to be transferred to prepayment meters (PPMs) even if people do not want them. But Fuel Direct may be preferable for some people in vulnerable situations, as it limits the amount of weekly income which can be deducted from benefit. Also people cannot be disconnected if they are on Fuel Direct.

4.3.2 Estimated bills

Many interviewees highlighted the numerous problems arising from estimated bills, as companies may not read meters themselves very often (some mentioned that it can be up to two years between company readings). Consequently people end up overpaying or underpaying, both of which causes problems for those on low incomes, for example the many who are on benefits. Also, some older people have difficulty in being able to read their own meters.

4.3.4 Metering issues

A number of interviewees emphasised that families under stress often want a pre-payment meter, regardless of price/tariff considerations, because of the fear of going into debt if they use other methods. Some have arrears and are paying these off through ppms, possibly because it is the easiest way, though some may not be clear about how much of their charges are related to paying off arrears, and this can give rise to household budgeting problems. However, many interviewees referred in one way or another to the high degree of self-rationing in households with ppms.

Interviewees frequently mentioned the problems in managing energy use for people on ppms because they only get an annual statement, which does not really give them sufficient useful information about consumption and costs. One interviewee noted that the trust funds/charities to which people may be referred (when in debt/financial difficulty) often 'like' people to be on ppms even if people do not want them, so effectively removing choice.

One interviewee highlighted scams, where crooks go door to door offering a 'special' price for ppm customers if they switch to the card they're selling (the perpetrators usually pass themselves off as electricity or gas company staff). People are allegedly sold credit for their meter but the money is kept by the crooks and does not go towards their energy use or debt. Where this has been uncovered, the companies have not been helpful, for example they have not offered to help victims.

⁸ Under the Fuel Direct scheme, payments are deducted directly from certain income-related benefits and paid to the energy supplier to cover arrears and on-going usage for gas and/or electricity. Eligibility is restricted to specified income-related benefits.

Interviewees who work with people in rural areas pointed out that it can be extremely difficult for some people to physically get to charging points for their cards/keys for their meters, especially if they have mobility problems and/or have to rely on, often poor, public transport services.

More generally, one interviewee reported that there was a particular problem in some local housing estates because homes were fitted with two meters, and it is unclear why this is so - the companies are often unable to explain which meter is for what (and this can produce wrong or misleading bills as a result). Many have or had underfloor heating, but it is not clear whether this is the source of problem, so people continue to face confusion.

4.3.5 Tenancy issues

Debt and arrears problems of those in HMOs (houses in multiple occupation) were discussed by some interviewees. For example, companies pursue whoever is left to pay off debts, even if they did not incur any or all of them; also, landlords can be unhelpful in this respect.

4.4 Managing energy use

The need for access to practical help with managing energy consumption emerged from the interviews. This includes reliable information on use of controls and appliances. In addition, barriers in managing energy use can also result because homes are not connected to mains gas.

4.4.1 Use of controls and appliances

Several interviewees pointed out that people often need very practical help and advice on how to manage their heating controls and appliances. Some are in new tenancies and have 'inherited' appliances and controls, without having any obvious means of understanding how they work, and how to use them effectively; for instance not having any form of instruction leaflet or notice. This issue was mentioned a number of times in relation to storage heaters, and radiator valves. In addition, people often do not know about how thermostatic valves can help them manage their consumption.

A key area where people can lack adequate information is in relation to the fuel usage of different home appliances, for example people may not be aware of the high consumption needs of plasma TVs, supplemental heaters or some games consoles. When interviewees point this out to people, it usually comes as a shock.

Some interviewees highlighted the difficulties faced by people with sight loss or impairment in trying to read timers and other controls, thermostats, etc. Digital displays in particular are too small, the colours do not stand out, there are no audible signals and the instruction manual is in standard print. Also, although energy companies can provide devices such as electricity monitors that display how much electricity is being used, many people with sight loss can't read the display and there is no audible signal.

4.4.2 Not on mains gas

The difficulties faced by people who do not have access to mains gas were mentioned in a number of interviews. As oil (and coal) suppliers are not regulated there can be major problems in being able to budget.

One interviewee commented that *'We have been tracking oil prices and find that it's common for price per litre to increase considerably in the lead up to Winter (then to drop in Spring)'*. She added that, for people to take up a tenancy, the oil tank has to be fully or partially filled (though who determined this on the basis of what evidence was not clear). In practice this can mean that, in order to get a home, people have to find £300, even £400 to purchase sufficient oil. Most tenants do not have this amount of money available and can find themselves having to go to loan sharks.

Also, it is often difficult for people to know what their consumption is likely to be, unless a previous tenant is willing or able to tell them. The interviewee commented that it is difficult to 'switch' as the suppliers are not interested in people's circumstances and will try to 'keep' contracts for a property when the tenants change. Finally, the interviewee maintained that in some housing there is no heating or electricity unless there is enough 'in the tank' (it is possible that this condition might be in certain fuel suppliers' contracts, but further research is needed).

Another interviewee said that some clients are in accommodation where the gas pipes are owned by Independent Gas Transporters rather than the National Grid. In these situations the main fuel companies said they would not install PPMs, which can create problems for people on low incomes.

Several interviewees highlighted difficulties in rural areas where there is no mains gas supply. Being able to budget adequately can be a big problem, because for those on low incomes in particular it can be very hard to find the money to fill their oil tank, particularly as suppliers almost always insist on a minimum order amount (which can be costly). One said that there seems to be an increasing problem with oil thefts from people's tanks.

4.4.3 Taking account of individual needs

An interviewee described a number of reasons that some older people may not be pro-active in wanting to improve the energy efficiency of their home. This may be because they may be used to colder homes, and even if they have health problems they are reluctant to switch on heating because of fear of fuel debt. This can also be the case after energy efficiency work has been carried out. Also, they may be reluctant to have the work done because of disruption, or design (for example, pipes showing), or be fearful of having to learn to use complicated systems or technology.

Another interviewee referred to practical issues that need to be addressed, such as the need to fit in with people's medical appointments and treatments. If people are going in and out of hospital, appointments for energy efficiency measures may be missed and possibly lost.

One interviewee, who works with families with young children who are on low incomes, said that barriers can include not having English as first language and unfamiliarity with systems, which can appear daunting. Also, chaperones may be needed when energy efficiency work is carried out, such as another family member or community worker, and this can be difficult to arrange.

4.4.4 Companies' practices

One interviewee maintained that from their experience only one of the suppliers seems to have a proper energy efficiency advice service. Another mentioned that they were coming across a lot of cold calling from companies offering to carry out energy efficiency work, and that many make unsubstantiated claims about financial help for consumers to meet the costs. Some people simply do not like cold calling about energy efficiency, others are confused as a result, as they are unclear about the companies calling or their entitlements.

4.5 'Fear and loathing' of energy companies

Fear of the energy companies is often felt by many people in vulnerable situations, according to many of the interviewees.

For example, an interviewee said that there is a reluctance to talk to the companies and people need advocates to sort out problems on their behalf; there are problems with low self-confidence and sometimes fear of the companies, and people often assume suppliers will not be sensitive or helpful. Some possibly have undisclosed learning disabilities, or literacy and numeracy difficulties. Another concluded that most of their clients think the companies are *'trying to rip them off; there's a lot of suspicion, and fear around'*.

A number of interviewees took the view that people who are in difficulty are often reluctant to contact their supplier because they are worried they will fall out of favour if they reveal problems in coping with energy bills. Also, people may well be nervous about divulging personal financial information to a private company.

Generally, the companies are not seen as independent sources of help. Consumers may also, understandably, be unaware of regulation, and of company obligations regarding debt and disconnection. In addition, if people are on benefits, they may also be worried about opening themselves up to more scrutiny.

A few interviewees pointed out that people are 'massively distrustful' of the suppliers, so they are not predisposed to look at information on their bills. But at the same time some also assume that company has put them on the best tariff.

One interviewee explained that they do a lot of work helping people to apply to relevant charities in order to help them to pay bills, arrears and debts. In these circumstances, people accept that they have to give a full account of their financial and other circumstances, and their energy use. But under other circumstances people may be less willing to divulge these personal/household details, especially to energy companies.

An interviewee said that many of their clients have problems with English or numeracy, and with other problems (often arising from not having sufficient income) and put their bills away because they can't face them. This means that some clients are very heavily in arrears. There is a lot of fear of the energy companies, and people are worried about contacting them, including being concerned about the costs of getting through especially if people only have a PAYG mobile phone.

CASE STUDY

Mr M was concerned he was paying a lot for his heating and wanted to know how to check his tariff was good. Mr M was given some expert independent energy tariff advice and encouraged to look at the tools available to compare his energy use to tariffs. The advisor concluded that he should switch to another supplier. But Mr M was still very concerned and left the event, because in his words "the energy supplier might be angry", and was too nervous (to proceed), as he had heard that friends who had energy debts had been cut off.

4.6 Multiple needs and difficulties

A number of interviewees highlighted how people who are in vulnerable circumstances frequently experience a number of difficulties, including illness, being on a low income, and living in poor accommodation. Also, some are in contact because of sudden life events such as unemployment, trying to cope after the loss of a partner (who may have handled the energy bills). Some have a lot of pride and do not like appealing for help (and may not welcome being referred to a charitable trust to help cope with bills).

An interviewee explained that their approach has always been to provide a holistic service, as people struggling to pay their fuel bills will often have other debts. Getting to the root cause, however, can be very time-consuming. The people they support can have learning difficulties, language issues or cultural issues.

An interviewee reported that some tenants in stressful situations are worried about revealing details of their finances as they fear that this could put them at risk of losing their home, although this was not factually the case. Quite often the most vulnerable clients were isolated older people living miles away from access to mainstream services (or lacked a bus service which meets their needs). Another interviewee said that the most vulnerable were often homeowners who were struggling with the upkeep of the home, including energy matters such as not being able to afford to get a boiler repaired, or having poor thermal insulation.

An interviewee told us that some older people in their own homes are struggling financially but are afraid to contact anyone about it because they fear that pressure will be put on them to move into a care home.

A number of interviewees pointed out that many blind and partially sighted people cannot read general leaflets and literature and therefore do not know about the help they may be entitled to. People may be unable to fill in forms, for example, for energy efficiency help or benefit checks. Similarly, they cannot read letters about their energy survey as these are normally sent in small print. People in these circumstances were generally not aware of the kind of support that was available.

Problems with potential stigma attached to deafness can lead to a lack of confidence and possibly social isolation, especially among older people, for example, telephone calls can be stressful. Those who are profoundly deaf may have considerable reading and language problems - possibly their reading ability is around the level for 8 year-old. Also, people using British Sign Language (BSL) frequently have very limited ability with English.

An interviewee told us that there are increasing numbers of asylum seekers in their area, who are provided with accommodation and left responsible for bills. Some in this situation have never been responsible for energy bills in this way and so find themselves in debt and do not know what to do.

Conclusion

The interviews were intended to help build a more rounded picture of the needs of people in vulnerable circumstances facing multiple barriers with energy services. As with the findings from the literature review, the results showed the importance of the inter-action between people's circumstances and needs, and of organisational systems and practices.

It is clear that communications systems, such as call centres and reliance on internet-based services, present considerable barriers for some consumers. Similarly, the quality of assistance from frontline staff can be a barrier to accessing information and advice about tariffs and specific services.

In general, confusion about the different tariffs offered by the companies can add to people's difficulties, and some are unaware of what tariff they are on. It is also important to understand that people who are experiencing a great deal of stress may well not feel able or confident to make any changes in their energy tariff, or energy company.

Many people in vulnerable circumstances face multiple difficulties, for example, people may have multiple debts and housing problems. Factors such as poor literacy and numeracy, or unfamiliarity with the energy market, can make it very difficult for people to negotiate energy services. But also a wide range of people can find energy bills, tariffs and other information hard to understand.

People's information and advice needs also include how to cope with managing energy use, including use of controls and appliances, and the way these are provided need to be designed to take account of people's circumstances. Another clear message is the need to simplify price information, and for suppliers to provide information about all the forms of support that are available and ensure that specific services work properly, such as services for people with hearing impairments.

Finally, a general theme that emerged from the interviews was that fear of the energy companies is often felt by many people in vulnerable situations. People may also have problems with low self-confidence and may assume that suppliers will not be sensitive or helpful. Some possibly have undisclosed learning disabilities, or literacy and numeracy difficulties. They may also be worried about what might happen if they reveal difficulties. This is a continuing problem that the industry needs to address.

5. Why it matters

There many significant changes taking place in the energy sector, most of which are likely to have implications for consumers in vulnerable circumstances who are facing multiple barriers.

Retail energy prices are continuing to rise, accompanied by further increases in household fuel poverty. Changes are taking place in the arrangements for assistance with energy costs and in support for home energy efficiency. Moreover, following its retail market review, Ofgem is considering what further action to take to improve the workings of the energy market for consumers. At the same time, consumer advice and advocacy structures are due to undergo fundamental change over the next couple of years as a result of Government plans.

These developments graphically underline the importance of easily-accessible information, advice and support for people in vulnerable circumstances in this essential service.

5.1 Energy prices and fuel poverty

Many consumers face an increased risk of fuel poverty as a result of recent and future price rises and the growing financial pressures on many households.

Following on from previous increases, all six major energy suppliers have announced further retail price rises which, at the time of writing, are due to take effect in the latter part of 2011. The Centre for Sustainable Energy, with Consumer Focus, recently estimated figures for projected increases in fuel poverty (based on all the six major energy suppliers increasing prices by an average of 19% for gas and 10% for electricity)⁹:

- The estimated number of households in Britain facing fuel poverty is projected to increase from 5.1 million before the price rises to 6.4 million.
- The estimated number of people living in fuel poverty in Britain is projected to increase from 9.2 million before these price rises to just under 12 million.

What's happening to prices

Between 2004 and 2009, domestic electricity prices increased by over 75 per cent, while gas prices increased by over 122 per cent over the same period (Department of Energy and Climate Change, 2011a). Energy prices are expected to continue their upward trend to 2020, particularly as a result of plans for investment in renewable energy sources and to secure energy supplies, with costs currently estimated at around £200 billion.

⁹ Consumer Focus press release, 16 August 2011

The effects of price rises on individual consumers are uncertain, as they depend on a complex mixture of elements such as people's eligibility for and receipt of assistance; the adequacy of assistance; the effects of energy efficiency measures; and changes in household income levels. A further dimension of uncertainty is how the net costs of the proposed smart metering roll-out programme will impact on consumers. However, it is highly likely that the numbers of households in fuel poverty will continue to increase.

5.2 Other changes affecting the energy sector

Against a background of rising energy prices, other changes are taking place as well which will affect the information, advice and support needs of consumers in vulnerable circumstances (see Centre for Consumers and Essential Services, 2011).

Warm Home Discount

Changes are taking place in help with energy costs provided through social tariffs and discounts. The mandatory Warm Home Discount (WHD) is being introduced in 2011, and it is intended over time to replace social tariffs and discounts offered under industry initiatives through a voluntary agreement with the Government.

Under the WHD scheme, energy suppliers are required to provide a discount on energy bills to a 'core group' of low income pensioners.¹⁰ Suppliers are also required to provide the same WHD discount to a 'broader group' of people, although they have some discretion over which customers will receive this element. The government has suggested eligibility criteria for the broader group but it also stated that the list is not exhaustive. Consequently, suppliers are meant to have flexibility to target other households in fuel poverty. (Department of Energy and Climate Change, 2011b, and 2011c)

It is therefore vital that people receive clear information and advice about eligibility criteria and how to apply for this help, particularly those in the broader group as the eligibility criteria are likely to differ across the suppliers. Consumers will also need clear advice and information about suppliers' 'legacy' social tariffs and rebates which may remain open.

The WHD scheme is financed by the companies and the costs are borne by consumers in general. However, some consumers in vulnerable circumstances may not meet the eligibility criteria but they will bear the costs of the scheme in their bills alongside other consumers.

¹⁰ The 'core group' comprises people on Pension Credit Guarantee Credit in year one of the WHD scheme, which will then expand to include a stepped aged threshold for people on Pension Credit Guarantee and Savings Credit.

Help with energy efficiency

The Government has announced that the Green Deal (GD) will be introduced in 2012 to help improve the energy efficiency of homes in England (Department for Energy and Climate Change, 2010a). GD plans will be offered by approved GD providers to households in England to cover the cost of a package of energy efficiency measures. GD financing will be repaid through the consumer's energy bill. If people default on these payments, they could be liable to their home being disconnected from energy supply (within existing consumer protection provisions).

The Green Deal will also include a new Energy Company Obligation (ECO), which will replace the existing CERT (carbon emissions reduction targets scheme obligation) on the companies. ECO is intended to focus on providing energy efficiency measures for low income and vulnerable consumers (the 'Affordable Warmth' element) and for those living hard-to-treat properties such as those with solid walls. As with the existing CERT scheme, the cost of ECO will be borne by all energy consumers.

At the time of writing, it appears that the Affordable Warmth element is likely to form a small part of the overall ECO programme, and therefore only a very tightly defined 'group' of low income households is likely to be eligible. This underlines the need for vulnerable consumers to have access to trustworthy advice about eligibility for ECO and what it involves.

Similarly, access to independent and reliable advice about GD plans will be essential for those who do not qualify for help under ECO. This includes a raft of complex issues such as the financial aspects, consumers' rights regarding GD assessments and installations, protection against rogue traders and mis-selling, and how to pursue complaints and redress. Access to independent expert advice will also be crucial for vulnerable consumers who experience difficulties with GD repayments.

Vulnerable consumers in Scotland and Wales will need advice and information about any changes to energy efficiency assistance which may apply to them. At present, there is uncertainty about whether schemes in Scotland and Wales will continue in their present forms in future, or whether they will be integrated with or replaced by the Green Deal.

Smart meters

Energy suppliers have been mandated to roll out smart meters in the next few years (Department of Energy and Climate Change, 2010b). It is expected that these costs are likely to be borne by all consumers, and any cost-savings arising from any overall reduction in demand for energy resulting from the roll out will also be passed on to consumers.

It is anticipated that a range of new tariffs will be introduced alongside the roll-out of smart meters. This is likely to add to tariff complexity and make it even more difficult for vulnerable consumers to choose the most suitable energy tariff and deal. Clearly it will be essential for consumers to have

easy access to independent expert advice about the implications of the changes in tariffs that are likely to emerge alongside smart metering.

The introduction of smart meters raises other potential issues of concern for consumers in vulnerable circumstances. These include consumer rights and protection against remote full or partial disconnection by suppliers, the use of this system to switch consumers onto prepayment meters, as well as usability issues.

5.3 Regulation and consumer advocacy

Regulatory review of the energy market

Ofgem's review of the retail energy market identified a range of issues including tariff complexity, poor supplier behaviour, and lack of transparency. As a result, Ofgem proposed a series of measures aimed at tackling these problems and reforming the market (some have been referred to previously in this report).

Furthermore, the retail market review stated that:

'We remain concerned that, despite these proposed reforms, there may be many consumers, including vulnerable consumers, who still do not engage in the competitive market and may remain at risk from higher prices'. (Ofgem, 2011a)

However, at the time of writing, it is unclear whether Ofgem will proceed with additional measures to protect the interests of vulnerable consumers. Further consultations on various options are due to be published by Ofgem towards the end of 2011. But the issues identified in the retail market review continue to adversely affect many consumers in vulnerable circumstances.

Changes to consumer advice and advocacy

The government is proposing far-reaching changes in current arrangements for consumer advice and advocacy (Department for Business, Innovation and Skills, 2011). Under these plans, responsibility for all non-financial consumer education, information and advice, including the Consumer Direct helpline, will transfer to Citizens Advice (CA). Moreover, the plans mean that Consumer Focus will close together with its Extra Help Unit, which provides advice and support to 'vulnerable consumers'.¹¹

It is likely that CA will take on the energy-related and some other functions of Consumer Focus as well as the functions of Consumer Direct. However, at the time of writing, Government decisions were awaited. At present, CA's future remit is unclear, and there are concerns about whether it will have sufficient capacity and resources to provide specific energy advice-

¹¹ The Consumers and Estate Agents Redress Act defines a vulnerable consumer as being someone that it is not reasonable to expect to pursue the complaint themselves.

related services, such as those currently provided by Consumer Focus and its Extra Help Unit, and by Consumer Direct.

Conclusion

The energy sector is already a very complex market and one which presents considerable difficulties for many people, especially those in vulnerable circumstances. It is abundantly clear that there are substantial advice, information and support needs arising from the large-scale changes which are taking place in energy, as well as other changes which are on the horizon.

The evidence presented in this section and the rest of this report shows that many people's information, advice and support requirements in this essential service need to be fully recognised and properly addressed by the industry, and by the regulator and other policy-makers as a matter of urgency. The most basic and urgent requirement is to remove the multiple barriers that exist for consumers in vulnerable circumstances in obtaining the help they need.

Part 2

1. Vulnerability and risk factors

In this section, we explore a range of personal and household circumstances which can lead to or increase consumers' risk of vulnerability. This is aimed at helping to ensure that suppliers' policies and practices, and the provision of information, advice and assistance, are designed to meet the range of people's needs and do not create unnecessary hurdles or barriers.

The following is not intended to be an exhaustive list of potential risk factors but the research suggests that what follows is a reasonably comprehensive picture. Instead, the intention is to illustrate the potential extent and range of risk factors and help to achieve a better understanding of consumer vulnerability. In addition, we also suggest a number of likely correlates between risk factors to illustrate ways in which many consumers may experience multiple difficulties.

It is important to emphasise that not everyone in these circumstances can be assumed to be 'vulnerable'. Much depends on other influential factors, notably organisational behaviour and the extent to which suppliers' policies and practices take account of people's needs. Moreover, the risk of vulnerability can be short-term, affect people in different ways at different points in time, or be long-term in effect. The core issues are the degree of risk of vulnerability and whether this is addressed or exacerbated by organisational behaviour.

1.1 Poverty and low income

There is extensive evidence to show that living on a low income is highly likely to increase the risk of disadvantage, and sometimes vulnerability. Common problems include a higher risk of experiencing poor physical and/or mental health, higher likelihood of being a victim of crime, a higher likelihood of living in overcrowded conditions, etc. (For example see Parekh et al, 2010 and Poverty Site website reference)

According to the latest available figures on Households Below Average Income, in 2009/10, some 13.5 million people in Britain lived in households with a disposable income that is 60% or less of the median net disposable household income (after housing costs), the common definition of poverty/low income (Department for Work and Pensions, 2011).

Focusing on the numbers of people on very low incomes, the previous year's figures on poverty and social exclusion (i.e. for 2008/9) from the Joseph Rowntree Foundation and the New Policy Institute (Parekh et al, 2010) showed that the number living in households with the lowest incomes (that is, less than 40% of the median) totalled 5.8 million. Of those in households

under the 40% threshold, 3.7 million were working-age adults, the majority of whom (2.3 million) did not have dependent children.

It is clearly important that people on low incomes take up benefits to which they are entitled but take-up remains problematic. In 2008/9, an estimated 40% of eligible pensioners in Britain were not claiming Council Tax Benefit, 33% were not claiming Pension Credit and 17% were not claiming Housing Benefit (see Poverty Site website reference).

Living on a low income often has consequences which affect personal health and family relationships, and is frequently associated with other difficulties that people may experience in dealing with markets. For example, a study for the OFT (Europe Economics and New Policy Institute, 2010) highlighted that low income households are more likely to be on higher energy tariffs; to be less likely to have bank current accounts or Internet access and so be less able to access cheaper prices; and to have less access to cheaper food outlets.

Low income families also frequently incur a 'poverty premium' as a result of factors such as unavailability of cheaper credit, higher energy tariffs and lack of ability to use, the usually cheaper, direct debit payment methods. The 'poverty premium' has recently been estimated at over £1,280 per annum (Westlake, 2011).

The significance of low income as a causal factor for fuel poverty has been highlighted in many studies over the years. For example, according to an analysis for CSE and Consumer Focus (Preston et al, 2010) households in the three lowest income deciles accounted for an estimated 86% of all fuel poor households in England in 2010 on the full income definition of fuel poverty, and 88% on the basic income definition.

Likely correlates with other factors include:

- *mental and physical health problems, including among children in families living in poverty, arising from inadequate heating, poor diets, stress, etc*
- *social isolation and exclusion*
- *inability or reduced ability to engage actively with aspects of markets, for example, being unable to access the cheaper prices offered to those paying by direct debit.*

Examples of barriers:

- *at risk of arrears and debt, leading to decreased ability to switch suppliers (e.g. to obtain better deal)*
- *lack of disposable income increases risk of not being able to afford phone or internet communication and access to information*
- *at risk of not being able to increase essential use of services, for example, additional heating requirements due to onset of illness or disability*
- *at risk of having to make difficult 'decisions' about which essential goods and services to forego or whether to ration heavily.*

1.2 Poverty: relationship with physical and mental health

There is a pronounced correlation between low income and the existence of a limiting long-term illness or disability, and causality is likely to be a mixture of the two. Research by Leonard Cheshire Disability (Parckar, 2008) concluded that 30% of disabled adults of working age aged 25 to retirement were living in poverty; this poverty rate was around double that for non-disabled adults of working age. According to the New Policy Institute, 55% of disabled adults living in workless households are also living in poverty (Palmer, 2010).

There is also a correlation between very low income levels and mental health problems. Among men, those on very low incomes are twice as likely to experience mental health issues as men on average and above average incomes; among women the difference is nearer 50%. Poor mental health is accepted to be a cause as well as an effect of living on a low income (see for example, MacInnes et al, 2009).

Disabled people in general are around twice as likely to live in poverty as non-disabled people, yet disabled people face extra costs that are, on average, around a quarter above normal expenditure compared to non-disabled people (Parckar, 2008). A third of disabled adults of working age live in poverty (Disability Alliance, 2009).

Households containing someone with a disability or a long-term illness have a higher rate of fuel poverty than other households (Department of Energy and Climate Change, 2011a). Research quoted by Leonard Cheshire Disability shows that disabled people spend a greater proportion of their income on fuel costs than non-disabled people - about 38% more on average (Leonard Cheshire Disability, 2009). This research also showed that fuel poverty (and consequent self-rationing) can have significant impacts on people's physical and mental health.

Note: Other factors that can affect disabled people are discussed further below (section 5.7).

Likely correlates with other factors include:

- *increased risk of being unemployed*
- *increased risk of facing additional health-related costs in the home, such as high essential heating or water usage.*

Examples of barriers:

- *increased risk that the extra non-energy costs of impairment/illness reduce people's disposable income*
- *increased risk of high bills because of additional energy consumption*
- *increased risk of not being able to increase household income through paid employment*
- *increased risk that a family member has significant caring responsibilities in the home, which can further reduce the level of household income.*

1.3 Poverty and ethnicity

There have been many studies on poverty and ethnicity, a substantial number of which were covered in a wide-ranging review of the evidence carried out for the Joseph Rowntree Foundation (Platt, 2007). This report found higher than average levels of poverty across all the ethnic minority groups studied, with the highest rates among Bangladeshis, Pakistanis and Black Africans. In general, the differences occurred irrespective of age.

A central factor determining the existence of poverty was the level of income from employment, also levels of unemployment were higher than average for all ethnic minority groups. The reasons for this were varied, with lack of adequate English fluency only being one among many. In addition, income from benefits was usually lower, because of more limited entitlement (for example, to contributory benefits) and because of lower rates of claiming.

Recent research for the DWP found that people living in households headed by a member from an ethnic minority background are more likely to live in low-income households, (Department of Work and Pensions, 2011) and this is particularly the case for households headed by someone of Pakistani or Bangladeshi background.

Recent research by Save the Children (2011) on severe child poverty (defined as children living in households with less than 50% of the average income), found that children from Pakistani, Bangladeshi and Black African backgrounds are much more likely to be in severe poverty than other children. Between 30% and 35% of these children are in severe poverty, compared to 11% of White British children, according to this research.

There is evidence of significant financial exclusion among some ethnic minority groups, particularly among Pakistani and Bangladeshi families (Lawton and Platt, 2010). This research for IPPR found that people from a Pakistani or Bangladeshi background appeared much less likely to have a bank account, for example, and therefore are likely to be excluded from accessing some of the cheapest energy tariffs. Although we were unable to find research evidence concerning the prevalence of fuel poverty among people from black and minority ethnic communities, it is reasonable to assume that it will affect many BME households who are on low incomes and/or in poor housing.

Likely correlates with other factors include:

- *greatly increased risk of living in poverty among some minority ethnic communities*
- *increased risk of being unemployed*
- *increased risk of not claiming entitlements to benefits*
- *increased risk of suffering, or fear of suffering, discrimination.*

Examples of barriers:

- *increased risk that not having English as first language (where it results in a lack of adequate English communication skills) reduces the ability to find and fully understand useful information*
- *increased risk that lack of knowledge of entitlements, sources of help, or unfamiliarity with markets and systems restricts income and reduces the chances of getting the best deals*
- *increased risk that access to paid employment, especially reasonably-paid employment, may be jeopardised by discriminatory practices.*

1.4 Unemployment

Unemployment is one of the key circumstances which make it more likely that some people experience recurrent poverty; the other three major causes of recurrent poverty are having a limited education, being a single/lone parent, and/or being a skilled manual or lower skilled worker, according to recent research findings (Tomlinson and Walker, 2010).

Those who fall into poverty at one stage in their lives (a single spell or repeatedly) are much more likely to experience it in future, regardless of factors such as education and occupation. This study drew the distinction between financial strain and material deprivation, along the lines of Townsend's previous work (1979): the former relates to people who are just managing or coping but who are under strain; and the latter refers to people who are unable to afford what are generally accepted as necessities. It is important to note that those who are just coping are vulnerable to the consequences of sudden or unexpected adverse changes in circumstances.

There is considerable evidence of the range and seriousness of the consequences to individuals and households of becoming unemployed, and being unemployed in the longer term. This includes work by the Cabinet Office Social Exclusion Task Force (2009) which identified the increased risk of poor health, especially poor mental health; an increase in relationship conflicts; increased risk of alcohol abuse; and debt and associated problems. There is also a body of evidence which points to links between unemployment and poorer physical and mental health (see, for example, TUC, 2010).

As well as unemployment, job insecurity can place people at greater risk of vulnerability. Dependency on irregular hours, part time work and seasonal or short term contracts create considerable income instability, according to research for the Commission for Rural Communities (Institute for Public Policy Research, 2009a) on the effects of job loss in rural communities. People in seasonal employment had no income while they waited for wages to come through in the first month of employment, and for benefit claims to be processed when the contract finished. Building assets, such as savings, was also difficult for people with disability and chronic health conditions.

In a substantial longitudinal study research for the Joseph Rowntree Foundation (Shildrick et al, 2010) in an area with a high proportion of low paid jobs (in Middlesbrough in this case), the researchers found many people stuck in a 'low pay, no pay cycle', despite people's significant efforts to find better-paid employment. In short, low pay was an integral feature of the poverty picture, with people moving in and out of low-paying jobs but never moving far from poverty.

47% of unemployed households in England were in fuel poverty in 2010, according to research for Consumer Focus (Preston et al, 2010).

Likely correlates with other factors include:

- *having a limited education;*
- *being in less skilled/low income labour market sectors;*
- *increased risk of poor health, especially mental health;*
- *increased risk of alcohol abuse;*
- *increased risk of being in debt;*
- *economic insecurity with increased risk of moving in and out of low paid work.*

Examples of barriers:

- *increased risk of loss of self-confidence and self-esteem, possibly leading to poorer decision-making;*
- *increased risk of developing a depressive illness, which can affect decision-making abilities, motivational 'energy' levels, etc;*
- *the many increased risks associated with loss of household income.*

1.5 Living alone

Over half (58%) of fuel poor households in England consisted of a single adult in 2009 (Department of Energy and Climate Change, 2011a).

As an analysis of official data¹² to investigate the link between fuel poverty and low income by the New Policy Institute (NPI) for eaga Charitable Trust commented:

'The obvious policy implication is that any initiatives to reduce fuel poverty will have a limited impact unless they cover single-person households. This includes those of working age as well as the better known case of pensioners. In this context, it is somewhat ironic that single-person households of working age are precisely one of the main groups that the fuel poverty programme does not classify as 'vulnerable'. (Palmer et al, 2008)

¹² The latest official data was for 2005 but, because of subsequent energy price rises, the NPI developed a 2007 version of the 2005 data which incorporated the price rises. This was used to analyse overlaps and risks for 2007 as well as for 2005.

The NPI report also highlighted how single-person households also face higher relative housing costs than other household types and are more susceptible to adverse events, such as illness or unemployment.

Likely correlates with other factors include:

- *at risk of unemployment*
- *living on a low income*
- *at risk of poor physical health*
- *at risk of social isolation.*

Examples of barriers:

- *at risk of arrears and debt*
- *at increased risk of fuel poverty.*

1.6 Mental health issues

Losing income, losing loved ones, struggling to cope with caring - these and many other causes of mental health problems, especially the most common 'types' such as depression, panic and anxiety states - can contribute to multiple barriers, both in themselves and when coupled with poverty. One in four people experience some kind of mental health issue in the course of a year.

'Common mental disorders' (CMDs) are, as the name implies, the most widespread of mental health conditions, affecting about one adult in six in England (National Centre for Social Research and the Department of Health Sciences, University of Leicester 2007). More than half of these had mixed anxiety and depression disorder.

About half of people with common mental health problems are no longer affected after 18 months, but poorer people, those who with long-term medical conditions, and unemployed people are more likely to be still affected than others (Office for National Statistics, 2003).

There can be many consequences but one of the most frequently mentioned is indebtedness: living with a mental health problem increases the likelihood of being in debt, while this in turn often affects mental health. A Mind survey (2008) found that 63% did not tell creditors about their mental health problem because they didn't think they would understand: their attitude seems reasonable as of the 37% who did tell creditors, 83% said they had been harassed about debt repayments.

A monetary estimate of the adverse effects of mental illness on people's quality of life in England, quoted by the Royal College of Psychiatrists (2008) stood at just under £42 billion (original estimate from Sainsbury Centre for Mental Health, 2003). Those with mental health problems are at twice the risk of losing their job (Sainsbury Centre for Mental Health, 2009).

Falling within what might be described as mental health issues are a wide range of conditions such as autistic spectrum disorders (including Asperger), obsessive-compulsive disorders (OCD), complex phobias, etc. There are over half a million adults and children with some form of autism (see National Autistic Society website reference). OCD affects up to 3% of people and an estimated 10 million people experience phobias - although it is thought over half of these are likely to have 'simple' phobias (for example, of dentists), others experience complex phobias such as agoraphobia and social phobia (see NHS Choices website references).

The difficulties these can create for people are numerous, and often quite serious, and frequently affect dealings with services and markets.

People with poorer mental health were more likely to report 'difficult to solve' civil law problems, according to an analysis of the English and Welsh Civil and Social Justice Survey (CSJS) by the Legal Services Research Centre (2009), and they were also more likely to report multiple problems. People with poorer mental health were less likely to act to resolve civil law problems, or try to resolve problems on their own.

Although it did not prove possible to identify specific research on fuel poverty among people with mental health problems, it is reasonable to assume that those who are in financial difficulties and/or in poor housing are likely to be especially at risk in this respect.

Likely correlates with other factors include:

- *living on a low income*
- *experiencing long-term ill-health*
- *increased risk of being unemployed*
- *increased risk of being economically or socially isolated*
- *increased risk of being unable to engage with markets*
- *increased risk of suffering, or fear of suffering, discrimination.*

Examples of barriers:

- *trying to cope with complex markets (and complicated health and benefits systems) could lead to poor decision-making*
- *increased risk of falling into arrears or debt as a result of poor decisions or as a result of not receiving income from reasonably well paid employment*
- *increased risk that debt and other financial problems will worsen mental health and so create an extra layer of difficulty in dealing with complex markets*
- *not being able to cope with shops and shopping centres, so having reduced choice.*

1.7 Having a physical impairment/being disabled

Many disability organisations and people with physical impairments place increasing emphasis on the social model of disability which focuses on the

actions, and inactions, of society in determining what is essentially *disabling* (instead of the 'medical model' which focuses on what is medically 'wrong' with the person):

'The social model of disability makes a clear distinction between impairment and disability. Impairments are long-term characteristics of an individual that affect their functioning and/or appearance. Disability, however, is viewed as the disadvantage, or restriction of activity and participation, caused by aspects of society that take little or no account of the needs of people with impairments...'
(Office for National Statistics, 2010)

29% of adults in Great Britain had an impairment in 2009/10, according to the above ONS survey (see below for further findings).¹³

In this section, we outline the major types of physical (that is, motor and sensory) impairments which affect significant numbers of people at any one time. We also give some examples of how having an impairment may result in someone being disabled as a result of the ways in which society and organisations operate.

For example, one of the commonly cited impairments or conditions is arthritis, affecting about 10 million people in the UK (see Arthritis Care website reference), which can seriously affect mobility and dexterity as well as being a source of considerable pain. The next most common sets of conditions comprises heart and circulatory problems, followed by respiratory diseases such as asthma and bronchitis. Again mobility may be affected and some 'everyday' activities may be difficult to carry out.

Dyspraxia can also cause dexterity and motor coordination problems, and sometimes speech problems, making routine tasks of daily life such as driving and household chores difficult, while some experience memory problems or difficulty in planning and organising thought.

Hearing loss affects around 10 million people, of whom about 6.4 million are aged over sixty; and more than 800,000 are severely or profoundly deaf (many of whom have additional disabilities). Around half of older people in the UK have additional disabilities or long term health conditions as well as their hearing loss. (Action on Hearing Loss, 2011)

Moreover, the effects of hearing loss on reducing ease of communication can be isolating, it can impact on people's mental health (Tambis, 2004), and it may lead people to avoid potentially difficult situations such as using phones.

¹³ A respondent was defined as having an impairment if they indicated the following within the impairments and health conditions section of the ONS questionnaire: they experience either moderate, severe or complete difficulty within at least one area of physical or mental functioning, and certain activities are limited in any way as a result. 'Activities' referred to different areas of physical or mental functioning, such as walking, climbing stairs or reading a newspaper.

The other main sensory impairments are sight loss, other sight problems, and blindness. There are about 2 million people with significant sight loss in the UK and the number affected is set to increase dramatically in future. The risk of sight loss increases with age and also, there is a growing incidence in key underlying causes, such as obesity and diabetes. People from black and minority ethnic communities are at greater risk of some of the leading causes of sight loss. (See RNIB website reference)

In practice, many of the implications and consequences are similar to those of hearing loss, and there are also some rough parallels with respect to the need for many people to find, and often pay for, assistive devices or technologies in order to interface more effectively with others and with organisations.

Every year an estimated 111,000 people in the UK. Those over 65 years of age are most at risk from having strokes, although 25% occur in people who are under 65 (see NHS Choices website). People from lower social economic backgrounds are more likely to face major risk factors of stroke (British Heart Foundation and Stroke Association, 2009).

One of the factors that can compound the effects of a stroke for people is reduced mobility, which can be a particular problem for those in rural areas. Research for the Commission for Rural Communities on the impact of major life events such as a stroke (IPPR, 2009b) outlined how depression and mood disorders are common, and several of the stroke patients who participated in the research had experienced mental health issues because of their stroke. Transport is an ongoing issue in many rural areas and the research highlighted how losing the ability to drive can have major impacts financially and on the quality of life of people who have had a stroke.

Living with an impairment or a long-term medical condition can affect everyday life in a number of ways and result in multiple barriers. These were graphically set out in research for the Department for Work and Pensions (Sykes et al, 2005). This showed how the lives of older people who are affected by ill-health and disability may be structured by medication or other clinical routines, forced into certain spatial patterns by restrictions on mobility, or tied to the comings and goings of helpers and carers. Routine is often critical and departures from routine (trips away from home, visits from people, unexpected events) can cause upset and require considerable organisation and planning. As the report described:

'Life can also simply be hard work for people with health problems or disabilities. Everyday activities can take more physical and psychological effort and further deplete already diminished banks of energy and stamina. Pensioners in our target group are more likely to tire easily and quickly to reach their limits of endurance, whether standing in queues, talking on the phone or looking for documents at home.'

There are also a range of illnesses or conditions which should not be overlooked. For example, acute and/or chronic pain, such as that occurring as a result of angina, shingles, sciatica, diverticulitis, many types of infection, etc. can drain people's energy and make it difficult to concentrate on other matters. Another important dimension is the level of distraction and emotional distress which can, for example, attend the diagnosis and effects of cancer or heart disease and make it more difficult to deal with other aspects of everyday life - not only for the individual but also for others in the household.

Barriers to participation

The ONS survey (Office for National Statistics, 2010) of the social barriers to participation that people with impairments in Britain can experience found that:

- 93% of adults with impairments reported they had a participation restriction in one or more life area, such as leisure social and cultural activities; employment; economic life; education and training; transport; social contact; housing; accessibility outside the home; accessibility of public services; domestic life and social care.
- Households where at least one person had an impairment were less able to keep their home warm (12 per cent) compared with households with no-one with impairments (6 per cent).

The nature and extent of the barriers which particularly affect people with an impairment varied across the different 'life areas', but those most commonly cited included:

- difficulty making contact by phone;
- unhelpful or inexperienced staff;
- lack of help with communication;
- lack of accessible information;
- difficulty getting into buildings;
- people's anxiety and lack of confidence;
- reasons relating to people's conditions, impairments and disabilities.

People with impairments can experience discrimination, and this may be particularly prevalent among disabled asylum seekers and refugees, though as researchers have pointed out, this is usually a 'hidden population' of people, about which far too little is known. However, a study for Refugee Support/ Metropolitan Support Trust found that disabled asylum seekers and refugees face multiple barriers to accessing disability services (Ward et al, 2008). These included difficulties with language and appropriate interpreting services, lack of knowledge about rights and entitlements, and a combination of isolation with the inability to communicate.

Households containing someone with a disability or a long-term illness have a higher rate of fuel poverty than other households (Department of Energy and Climate Change, 2011a)

Likely correlates with other factors include:

- *living in poverty, in the short or long term, in some cases as a result of the extra costs of disability, though unemployment is also a major risk factor*
- *increased risk of physical exclusion from the retail end of markets*
- *increased risk of experiencing barriers in markets, for example by finding it difficult to access automated phone-based systems*
- *social exclusion, e.g. for some in rural/isolated areas.*

Examples of barriers:

- *increased risk of being excluded, physically, from places in which to work, to enjoy leisure and sports activities, to gain information/advice on a face-to-face basis*
- *increased risk of encountering communications barriers*
- *increased risk of having to incur additional household costs, such as extra heating, high levels of essential water use, assistive equipment.*

1.8 Having a cognitive impairment

We have separated out this issue, principally because cognitive impairment can often be a hidden problem and is frequently overlooked.

Sudden or progressive cognitive impairment - which can affect memory, organising and carrying out tasks, understanding and use of language, figures, etc. - can arise in many ways. The most obvious category is dementias, mainly Alzheimers or vascular dementia. Dementia is more common in older people, but sometimes it can start in people as young as 40: about 5% of people over 65 have dementia and by the age of 80 about 20% have some degree of dementia (see Royal College of Psychiatrists website reference). Other causes can include Parkinsons, kidney, liver or thyroid problems, and certain types of infection.

Cognitive impairment can also occur as a result of an acquired brain injury, whose causes include accidents, tumours, strokes, aneurysms, etc. It is estimated that there are around 500,000 people aged 16 - 74 in the UK living with long term disabilities as a result of traumatic brain injury (see Headway website reference).

Effects can include problems with memory, attention and concentration, low tolerance of noisy or stressful environments, loss of insight and initiative. It is important to note that the levels and nature of these and other impairments can fluctuate and change over time.

Likely correlates with other factors include:

- serious health events such as strokes, brain injuries resulting from accidents, etc
- impaired judgement and decision-making processes.

Examples of barriers:

- increased risk of poor decision-making and reduced chances of getting the best deals
- increased risks associated with the loss of income, particularly from paid employment.

1.9 Learning disabilities

Some organisations prefer to use the term ‘learning difficulties’ rather than ‘learning disabilities’ and debates about the terminology continue. A useful discussion by the British Institute for Learning Disabilities (2011) points out that the two terms are interchangeable when used in the context of health and social care for adults but also that people with specific learning difficulties such as dyslexia do not have ‘learning disabilities’.

The organisation, People First, run by and for people with learning difficulties, explains that it chooses ‘to use the term *‘learning difficulty’* instead of *‘learning disability’* to get across the idea that our learning support needs change over time.’ (see People First website reference)

Various developmental problems, especially before and shortly after birth, are a significant cause of learning disabilities, but there are numerous other causes. There is a wide range of estimates of the numbers of adults with such disabilities, but Mencap’s estimate of 1.5 million children and adults is generally accepted (see Mencap website references). The number of adults with learning disabilities was expected to increase by 11% between 2001 and 2021 (see Foundation for People with Learning Disabilities website reference). Fewer than one in five adults with learning disabilities are in paid employment. An, unknown, minority, of adults with learning disabilities live independently.

People whose primary or main disability is a learning disability are more likely to be living in poverty. For example, according to Mencap (see website references), fewer than one in five people with a learning disability has paid work, though 65% of people want to work. Of those people with a learning disability that do work, most only work part time and are low paid. Adults with learning difficulties or disabilities were most likely to experience some forms of financial exclusion, notably ownership of bank accounts and savings, according to research for the Equality and Human Rights Commission (Lawton and Platt, 2010).

Barriers arising from societal attitudes and assumptions about people with learning difficulties/disabilities have been highlighted by organisations such as People First:

'Doctors and teachers and other professionals put labels on us marking us out as different from everyone else. It is these labels which get in the way and stop us taking part the same as anyone else, for example people labelled as having a learning difficulty get sent to special schools and then on to day centres when what we would really like is to get a job...'

(see People First website reference)

Likely correlates with other factors include:

- increased risk of not being in paid employment
- increased risk of economic exclusion.

Examples of barriers:

- increased risk of poor decision-making
- exacerbated by increased risk arising from 'learned dependency', which can make some people more vulnerable, e.g. with respect to doorstep selling.

1.10 Speech impairments

These are among the most common causes of communication difficulties. The charity Scope has estimated that there are 1.5 million adults in the UK who have a communication impairment but it also points out that the actual number of adults who need support to communicate is likely to be far higher as national statistical data on this is lacking (Scope, 2009).

There are many causes of speech impairments, for example aphasia, which is caused by damage to the language centres of the brain, as the result of a stroke, head injury, brain tumour or other neurological condition. The charity, Speakability, which focuses mainly on aphasia, points out that someone with aphasia may have problems with any one, or more, of the following: talking; listening; understanding; writing; using numbers (see Speakability website reference).

Someone with aphasia may find that their communication difficulties can change from day to day or even hour to hour, and these difficulties are likely to be worse when tired, unwell or under pressure.

Stammering affects some 459,000 adults according to NHS Choices (see NHS Choices website reference). The British Stammering Association points out that:

'Stammering is not simply a speech difficulty but is a serious communication problem. For the child or adult who stammers it can undermine their confidence and self-esteem, and affect their interactions with others as well as their education and employment prospects.' (see British Stammering Association website reference)

Likely correlates with other factors include:

- *social and economic exclusion, and isolation*
- *increased risk of being unemployed*
- *increased risk of poor access to communications services, so potentially less access to markets.*

Examples of barriers:

- *increased risk of being economically and/or socially excluded, for example by not having paid employment*
- *increased risk of incurring the, often-significant, extra costs associated with purchase of Augmentative Alternative Communications equipment;*
- *increased risk of problems in accessing information, advice and support because of barriers posed by call centres and other communication systems, and lack of confidence.*

1.11 Literacy and numeracy difficulties

It could be argued that those with low levels of adult literacy and/or numeracy skills might be especially at risk of being financially excluded. It is therefore remarkable that successive governments have not enquired into these skill levels on a regular basis.

The last National level adult assessment was conducted in 2003: *'The Skills for Life Survey'* (Department for Education and Skills 2003). This survey, of adults of working age, found that 16% had a low level of skills: over a third of adults in the lowest socio-economic category were classified as having lower literacy skills. There are still 5 million adults without adequate literacy skills according to NIACE (2010), and the organisation is currently coordinating an independent inquiry into adult and youth literacy in England. Lord Leitch's review of skills for the Treasury estimated that 7 million adults lacked 'functional numeracy' (Leitch, 2006).

These types of difficulties may not be obvious as people may well seek to minimise or avoid revealing them because of fear of humiliation. For example, qualitative research for the former National Consumer Council (2003) among people with basic skills difficulties found that participants had suffered an array of humiliating situations and abuse and had been negatively labelled because of their basic skills difficulties. Problems encountered included dealing with situations or people that were out of the ordinary, especially in emergencies. There were additional problems with comprehending and responding to letters from suppliers; and dealing with complex automated telephone systems used by utility companies.

A more recent literature review of numeracy for NIACE (Carpentieri 2010) showed that those with low numeracy skills in their mid-30s were much more likely than others to experience unemployment, and much less likely to receive training, a promotion or a pay rise. Adults with poor numeracy were 2.5 times more likely to report having a long-standing illness or

disability, and were more likely to experience depression: they were twice as likely as others not to have internet access or to use the internet.

Likely correlates with other factors include:

- *increased risk of being excluded from labour markets*
- *increased risk of being on a low income*
- *increased risk of experiencing, or fear of suffering, stigma.*

Examples of barriers:

- *increased risk of reliance on others, such as family members or friends, for information, explanations, and advice, rather than seeking/receiving independent expert assistance*
- *increased risk of making poor decisions*
- *increased risk of being a victim of fraud, misleading advertisements, miss-selling practices, etc.*

1.12 Not having English as first language

Not having English as one's first language poses no difficulties for many people but it may be a barrier for others when it is associated, for example, with literacy problems and/or with lack of confidence in using English. It may also present difficulties when people are unfamiliar with organisational systems and practices and may have different cultural experiences and assumptions as well. In addition, some people may be from localities or cultures where written languages are uncommon, or they may have had very restricted educational opportunities, and learning to understand and use English effectively may be more problematic than for others.

This is not the place to discuss such complex issues in detail but, in general, not having English as the first language could well be a barrier - one which may be more easily overcome for some than for others. And the fact that the energy sector is both essential and complicated puts into sharp relief the importance of understanding that significant numbers of consumers can face difficulties in coping with matters such as contract terms and bills.

Although there appears to be little published research material about how well or badly such consumers cope with complex markets, there is clearly a possibility that not having English as one's first language could lead to consumer detriment. One obvious proxy (and one which is highly relevant when discussing multiple barriers) is employment and earnings. For example official guidance for local authorities on translation of publications points to research showing that fluency in English (as assessed by an interviewer) increases the average hourly occupational wage by approximately 20%, and increases employment probabilities (Department for Communities and Local Government, 2007).

One area which has received some attention is the relationship between ethnicity and financial exclusion. For example a recent study (Mawhinney, 2010) concluded that a lack of English language skills inhibits both recent

migrants and longer-established BME people from fully communicating with, understanding and taking up those elements of financial advice and other services - which can lead to people taking on credit without fully understanding it, for example. It also highlighted that newly arrived migrants from culturally different backgrounds may not understand how financial, tax and utilities systems work, and that this can lead to debt.

Apart from ensuring easy access to interpreting and translation services, it has been assumed by many that organisations should, at the very least, seek to ensure that their written material is easily understandable. Consequently the Plain English Campaign, and others, seek to persuade companies to employ care in the design and writing of bills and other documents.

Likely correlates have not been included or proposed here because not having English as a first language by itself is not necessarily associated with other risk factors. However, one of the most obvious correlates is that of being an asylum seeker or refugee, although it is not clear what proportion of asylum seekers or refugees do not have English as their first language.

1.13 Being a carer

Taking on significant caring responsibilities for long term sick or disabled family members can also lead many to exist on low incomes. An estimated 1 in 8 adults - around six million people in the UK - are carers. Those providing high levels of care are twice as likely to be permanently sick or disabled, and an estimated 625,000 people suffer mental and physical ill health as a direct consequence of the stress and physical demands of caring. (Carers UK, 2009)

One in 5 carers is forced to give up paid work and, according to a Carers UK survey (2008):

- 72% of those with substantial caring responsibilities (generally, over 50 hours per week) are worse off since they started
- 30% have to cut back on food or heating, and 10% cannot afford to pay their rent or mortgage
- 74% are struggling to pay essential utility bills (with 65% experiencing fuel poverty), and
- 54% were in debt with nearly a third of these owing more than £10,000.

In the UK there are around 175,000 children under the age of 18 who are informal (unpaid) family carers as well as about 230,000 young adult carers aged 18-24. Research for the Commission for Rural Communities also demonstrated how young carers in rural areas face particular barriers in accessing and receiving services and support, compounded by distance, lack of adequate public transport, isolation, stigma and lack of privacy (IPPRc, 2009).

Likely correlates with other factors include:

- *increased risk of experiencing poverty, having to cut back on food or heating*
- *poor physical and/or mental health*
- *increased risk of being unemployed*
- *social and/or economic isolation.*

Examples of barriers:

- *increased risk of facing rationing of essential services, lack of choice, and other difficulties which can arise from living on a low income*
- *increased risk of facing barriers to choice, etc. which can occur when in arrears or in debt*
- *increased risk of being unable to increase household income through reasonably-paid employment.*

1.14 Being a lone parent

One in four families in the UK are headed by one parent, and are greater risk than other families of being below the poverty line. According to research by Gingerbread (Peacey, 2010), the reasons for this include limitations on earning power and lower income when in work; inadequate income from benefits for parents who do not work; and lack of child maintenance payments in many families (only 40 per cent of lone parents receive any maintenance).

A key reason for working lone parents' lower incomes is likely to be because of a preference for part-time work, which tends to have lower hourly wages than full-time work. Another factor relates to single parents' lower educational and vocational qualifications (overall, compared to others), which limits their earning potential. This Gingerbread survey also found that 62% had no savings, and that fuel bills caused the biggest problems for single parents in terms of debt, with 25% being behind with at least one bill.

An estimated 25% of lone parents were in fuel poverty in 2010, compared to 17% in 2007, according to an analysis for Consumer Focus (Preston et al, 2010).

Likely correlates with other factors include:

- *increased risk of living on a low income*
- *increased risk of unemployment or having only low paid/part-time work;*
- *more likely to lack recognised educational or vocational attainments*
- *more likely to have experienced problems associated with relationship breakdown, possibly including the effects of domestic violence*
- *particularly likely to face difficulties in meeting fuel bills.*

Examples of barriers:

- *Increased risk of rationing, and lack of choice related to living on a low income*

- *increased risk of facing barriers which are attendant on being in arrears or in debt*
- *increased risk of not being able to find and use 'the best deal' with respect to essential goods and services.*

1.15 Experiencing relationship breakdown

It is commonly assumed that the 160,000 or so divorces each year in Britain often cause substantial financial problems. This assumption is validated by a survey by the Debt after Divorce Campaign (see website reference). It found that 45% of respondents said that breaking up had caused more financial problems than redundancy or bereavement, with 36% having incurred substantial personal debts as a result; also, 28% found it hard to adjust to having just one household income and 10% had difficulty sorting out their debts and had to consider bankruptcy.

Unsurprisingly, people's health can be affected by the experiences leading up and after divorce or separation. For example a U.S. study in 2009 concluded that divorced or widowed people have 20% more chronic health conditions such as heart disease, diabetes or cancer than married people: they also have 23% more mobility limitations, such as trouble climbing stairs or walking a block (Hughes and Waite, 2009).

There is also the issue of domestic violence. At least 1 in 4 women experience domestic violence in their lifetime and between 1 in 8 and 1 in 10 women experience it annually (Women's Aid, 2009). The organisation also estimates that 45% women and 26% men have experienced at least one incident of inter-personal violence in their lifetimes. Women are much more likely than men to be the victim of multiple incidents of abuse, and in any one year, there are 13 million separate incidents of physical violence or threats of violence against women from partners or former partners.

In a study by Shelter, (quoted by Women's Aid), 40% of all homeless women stated that domestic violence was a contributor to their homelessness. They also conclude that violence against women has serious consequences for their physical and mental health, and women who have experienced abuse may suffer from or chronic health problems of various kinds: domestic violence and other abuse is the most prevalent cause of depression and other mental health difficulties in women.

Likely correlates with other factors include:

- *sudden changes in income and financial difficulties;*
- *increased risk of experiencing poor physical health, including limiting long-term conditions.*

Examples of barriers:

- *increased risk of financial instability, so more likely to fall into debt or incur arrears;*

- *increased risk of failing to manage household budgets adequately, which could reduce ability to make the most appropriate decisions with respect to essential goods and services.*

1.16 Experiencing bereavement

Bereavement frequently has significant financial as well as emotional impacts. Around 220,000 people in England, Scotland and Wales experience the death of a partner each year, according to recent research in the UK of the financial implications of the death of a partner (Corden et al, 2010). Understandably, people's personal circumstances just before their partner died are an important influence on what happens afterwards.

The study found that more than a fifth of households were living on incomes below the official poverty threshold, and one in eight households were spending more than 10% of household income on fuel. Income poverty was more widespread among people over state pension age; they were also most likely to be experiencing fuel poverty.

According to the above study, some of those likely to be at particular economic risk in bereavement included, for example, older women, people already living in financial hardship, people in poor health, and people without some of the protections that go with financial preparation or a legal partnership. One in three households experienced fuel poverty following the death (spending more than one tenth of disposable income on fuel).

The research highlighted the fact that most bereaved people in the study suffered from an immediate drop in income after their partner died. Most falls into poverty were short-lived, but women, especially pensioners, were more likely to experience poverty up to three years after their partner's death. Uncertainties about meeting housing costs were widespread. Although these were mainly resolved within months, delays and difficulties meant emotional strain and financial problems until things were settled.

The study also showed that how household incomes fell in the longer term, though not necessarily on a net basis (i.e. after accounting for consequent reductions in household expenditure). In addition, there are complicating factors as, for many of those bereaved the sources of income changed in the months following death - for instance, those of working age not only had lost their partner's earnings, but some also removed themselves from the workforce following bereavement particularly men (Corden et al, 2008).

Likely correlates with other factors include:

- *income poverty, both short and longer-term*
- *increased risk of experiencing fuel poverty*
- *increased risk of not being in paid employment.*

Examples of barriers:

- increased risk of losing household income from paid employment, and having to make major decisions during an emotionally difficult period
- increased risk of making 'wrong' choices in the short or longer term, which could increase impoverishment and/or undermine a person's self-confidence.

1.17 Experiencing older age

Research for Age UK reminds us that ageism is still commonplace, often based on assumptions that stereotype older people as vulnerable or unable to keep up with modern life (ILC-UK, 2010). In reality, many older people are perfectly capable and able to get on with their lives and deal with markets such as energy. If they face problems, these may well result from the attitudes and actions of others because of age discrimination.

Some older people may face difficulties which arise from inadequate incomes, possibly as they are outside the labour market, or other difficulties associated with living with long-term medical conditions or impairments. In 2009/10, there were 2.1 million pensioners (people over State pension age) in Britain living below the poverty threshold; 1.8 million when housing costs are taken into account (Department for Work and Pensions, 2011).

The situation has improved in recent years but pensioners are still more likely to be in the second lowest income quintile and less likely to be in the top two quintiles of the income distribution, than the population as a whole. Meanwhile a higher proportion of single pensioners living alone are in low-income households than any other group (Department for Work and Pensions, 2011).

Older age can be a risk factor if accompanied by a long-standing illness or disability (which affects almost half of over-75s), and/or if accompanied by low income (17% of pensioners), for example. But disability and frailty are not an inevitable part of ageing, as emphasised in the research cited above for Age UK:

'Many of the barriers that people in later life face are, at worst, indicative of market failure. At best, they are evidence that the needs of older consumers are often not well met'. (ILC-UK, 2010)

Where older people also experience disability and/or health problems, the effects can be cumulative and result in multiple barriers. This was evidenced in research for the DWP on the needs of vulnerable pensioners experiencing disability and/or ill-health (Sykes W et al, 2005). Many of the interviewees reported multiple problems or symptoms and the report showed how these often have a cumulative effect.

People may find their general ability to cope is affected by having more than one problem to deal with because of the extra limitations that each

imposes, and also as there is a general drain on stamina and physical or mental confidence. For example, there was overlap between the problems experienced, such as the effects of loss of sight or hearing on cognitive functioning, and the impact of restricted mobility on mental health, as the above study pointed out.

The risk of fuel poverty rate generally increases as people get older. In 2009, about half of all fuel poor households in England contained someone aged 60 or over, while around a quarter had at least one occupant aged 75+. Almost a quarter of households in England where the oldest person is aged between 60 and 79 are in fuel poverty, and over a third of households where the oldest person is aged 80+ are fuel poor. Single households aged 60+ accounted for 30% of all fuel poor households in England. (Department of Energy and Climate Change, 2011a)

The Marmot review of the impact of cold homes and fuel poverty on health showed that direct effects of cold housing for older people were evident in higher mortality risk, physical health and mental health (Marmot review team, 2011). In addition, the review identified a number of indirect effects including: increased risk of arthritic symptoms and of falls; increased social isolation due to reluctance to invite friends to a cold home; and higher risk of needing increased care or needing to go into residential care.

Likely correlates with other factors include:

- *increased risk of being on lower income levels, especially single older people*
- *increased risk of living with a long term disability or limiting long term condition.*

Examples of barriers:

- *increased risk of facing the types of barriers faced by other low income households, exacerbated by greater risk of encountering barriers to opportunities to increase their income levels (e.g. through paid employment)*
- *increased risk of 'digital exclusion', which may reduce people's ability to access useful information and to take advantage of cheaper online options.*

1.18 Living in a rural area

For some people, living in a rural area may give rise to a range of difficulties, for instance because of poor access to public and other services, including lack of access to mains gas, and increased risk of social isolation and economic deprivation. (Some of these factors can also affect people in particular suburban or extra-urban areas such as large estates on the fringes of towns).

For example, while most household requirements are the same for rural as for urban families, there are critical differences which mean, overall, rural households face additional costs of which transport costs make up the single

largest element, according to research for the Commission for Rural Communities (CRC) and the Joseph Rowntree Foundation (Smith et al, 2010). Domestic fuel costs constituted the next largest element of additional costs due to the absence of mains gas in many rural areas and reliance on more expensive forms of fuel for heating; and the prevalence of larger, older and less well-insulated housing stock in rural areas.

Households living in income poverty in rural areas were much more likely to be in fuel poverty than those in either urban or suburban areas, according to research by the New Policy Institute for eaga CT (Palmer et al, 2008). The analysis suggested that the reason for this was that, whilst (like rural households as a whole) they tend to live in larger and less energy-efficient properties, there was (unlike rural households as a whole) no offsetting factor in terms of higher incomes.

Recent estimates suggest that fuel poverty in England is higher in more remote rural areas than urban areas and small towns (Preston et al, 2010). About a quarter of households in villages and around one-third of households in 'hamlets & isolated dwellings' were estimated to be in fuel poverty in 2010.

Though not strictly a 'rural/urban' issue as such, geographical location can have a significant effect on energy use. For example, a report by Consumer Focus Scotland (2010) pointed out that:

'The colder climate very clearly contributes to higher levels of fuel poverty in Scotland. A family in the north of Scotland can spend 68% more on fuel use than the equivalent in the South of England, due mainly to the longer heating season.'

This report also commented:

'In rural areas, the high proportion of older houses with solid stone walls, and of consumers without access to mains gas, combines to increase rates of fuel poverty. These issues are more pronounced in Scotland.'

Energy Action Scotland (2011) has estimated that fuel bills in Scotland are on average 9% higher than those in England.

Access to the mains gas network is an important factor that affects about 4 million households in Britain, many of which are located in rural areas. Fuel poverty is higher among these households. Limited access to mains gas and high reliance on oil-fired heating are the main factors contributing to high fuel poverty in Northern Ireland, particularly among older people (NEA and Energy Action Scotland, 2011).

Research by the Rural Services Network (2010) in three areas of England found that fuel disadvantaged households in these areas were more likely to have a household member with health problems than households not living

with fuel disadvantage. Fuel disadvantaged rural households were also more likely to have someone in the home with asthma, respiratory or heart related illness and/or with a disability or long term illness.

Likely correlates with other factors include:

- *increased risk of not being in touch with key services*
- *increased risk of social exclusion and isolation*
- *often low expectations of service entitlement;*
- *living in poverty*
- *increased risk of poor access to communications services, so potentially less access to markets.*

Examples of barriers:

- *increased risk of low income due to poor employment opportunities and job insecurity*
- *increased risk of social isolation due to mobility and transport difficulties*
- *increased risk of limited access to energy services such as mains gas*
- *increased risk of poor access to advice and support services*
- *increased risk of lack of access to better deals due to lack of internet access.*

Conclusion

Our research highlights a range of risk factors that contribute to vulnerability and likely correlations between them. It underlines how there is a variety of circumstances which conventional categorisation of vulnerability frequently fails to acknowledge, including circumstances where people may be embarrassed or fearful about revealing their difficulties. Similarly, a wide variety of factors, including events such as loss of employment, bereavement, domestic violence, can heighten the risk of consumer vulnerability, and erode people's self-confidence and self-esteem.

It is clear that large numbers of people are at risk of vulnerability and of multiple barriers in relation to essential services such as energy. Policies and practices need to be informed by an understanding of the nature and extent of the factors that cause and contribute to consumer vulnerability, including the barriers that arise as a result of organisational behaviour.

Appendix 1: List of organisations interviewed

Age UK, Suffolk
Brighton and Hove CAB
Bristol Debt Advice Centre, Energy Advice Project
Cambridgeshire Supporting Deaf People Project
Centre for Sustainable Energy
Consumer Focus
Consumer Focus Extra Help Unit
Didcot and District CAB
Eaga
General Consumer Council Northern Ireland
Gingerbread
Headway
Leeds CAB
Macmillan Cancer Support
National Energy Action
RNIB
RNID
Save the Children
Severn Wye Energy Agency Ltd
Speakability
Wales and West Housing Association
Vale CAB

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