

Consultation Response

Energy Bills Support Scheme Additional Funding Consultation

Department for Business, Energy, and Industrial Strategy.

October 2022.

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About this consultation

The Energy Bills Support Scheme (EBSS) will deliver £400 electricity bill discounts to domestic customers over a 6-month period from October 2022. Some residential customer groups will be excluded from the EBSS, mainly because they rely on a commercial supply contract to underpin their electricity supply. The Department for Business, Energy & Industrial Strategy (BEIS) have devised initial proposals for the EBSS Additional Funding scheme to ensure that residential customers who faced exclusion from the core scheme still receive their £400. BEIS offered the opportunity for verbal consultation on this early phase of the scheme and Age UK compiled the below response to provide BEIS with a summary of our views. We sent this response to officials on 25th October 2022.

Key points and recommendations

- Significant improvements to the EBSS have been enacted – we commend BEIS’s reforms and their commitment to extending it via the Additional Funding scheme.
- BEIS should provide multiple routes to access the £400 Additional Funding discount to ensure people are able to access it regardless of circumstances.
- Ensure equal provision to the EBSS is provided for all residential households regardless of living circumstances and how they pay for their energy.
- The requirement that a householder demonstrates they are the bill payer will make providing evidence difficult for some (e.g. households off the electricity grid).
- The proposed application process risks excluding some of the most vulnerable older households – BEIS must address this immediately.
- Lengthy, complicated applications to access EBSS Additional Funding must be minimised, with automatic enrolment prioritised wherever possible.
- Accessing the scheme and demonstrating eligibility should be straightforward and include telephone, letter, and wider offline application routes.
- It is critical that households begin benefiting from the EBSS Additional Funding scheme before colder temperatures set in from December.
- A bulk application system could minimise the administrative burden for those households required to apply and prove eligibility.
- Adverts in print media, radio and television alongside letters and community groups will be crucial promotional tools. We recommend BEIS publicise the scheme in targeted publications like park home or housing association newsletters.

About Age UK

Age UK is a national charity that works with a network of partners, including Age Scotland, Age Cymru, Age NI and local Age UKs across England, to help everyone make the most of later life, whatever their circumstances. In the UK, the Charity helps more than seven million older people each year by providing advice and support. It also researches and campaigns on the issues that matter most to older people. Its work focuses on ensuring that older people: have enough money; enjoy life and feel well; receive high quality health and care; are comfortable, safe and secure at home; and feel valued and able to participate.

Introduction

Age UK responded to the original proposals for the EBSS in May¹ and provided an updated response in June after the Government announced several major improvements to the scheme². BEIS agreed to double the EBSS discount to £400 and remove the repayment levy, fully exempting consumers from repaying the money over subsequent years. This was a welcome move and led to the EBSS becoming central to addressing the energy price crisis. However, these welcome improvements to the scheme mean that households missing out on the £400 will face an even steeper challenge to cover their spiralling energy bills.

Therefore, we warmly welcome BEIS's commitment to introduce the EBSS Additional Funding scheme to support those missing out. BEIS estimates this represents around 1% of households. This comprises those who BEIS considers to be within the scope of the EBSS but who would otherwise remain unable to access the core scheme. This includes several housing types disproportionately occupied by older people, including park homes, care homes and social housing units. The major barrier to accessing the EBSS is that these households, amongst many others, frequently lack a direct electricity contract. This may be because they are relying on a communal meter point underpinned by a commercial supply contract, as is the case at many park home sites, or because they are paying for their electricity bills through a collective service charge or passthrough cost, as with many social housing tenants. In other cases, such as care homes, the premises are often operated as a business which means residents frequently miss out on the benefits of being treated as domestic customers (e.g. price cap protections and direct support from the Energy Price Guarantee).

BEIS has proposed several eligibility criteria for the EBSS Additional Funding scheme. Firstly, the property must be the main or sole residential address. Second, the resident must be responsible for paying for the energy used in the dwelling, whether directly or indirectly (e.g. through a landlord). Third, the household cannot have already received support from the core EBSS funding stream. Finally, the dwelling cannot be a business or

business premises with a commercial supply arrangement or within business premises, unless the main business of the dwelling is the provision of long-term residential accommodation. BEIS have provided reassurances that this will cover the vast majority of properties who were intended to be in scope for the EBSS but likely faced exclusion. This should also include homes lacking an electricity grid connection.

However, in most, if not all cases, individual households would need to provide an application and evidence that they meet each of the above eligibility criteria. BEIS has committed to make the process accessible and clear, with assurances that every household able to demonstrate eligibility by evidencing that they meet the above criteria will be included. BEIS's consultation questions focus on this application process and we provide answers to each below. In sum, the application process risks excluding some of the most vulnerable older households unless BEIS addresses several key concerns. We outline these concerns and our proposed solutions in response to questions 1 through 6.

Issues with eligibility criteria

We wish to outline some of the issues with the present eligibility criteria for accessing EBSS Additional Funding, before highlighting some of the specific groups who we want included. The requirement that a householder demonstrates that they are the bill payer will make providing evidence difficult for a range of households. It is essential older people are not excluded from the Additional Funding scheme because they face barriers to providing evidence of who the bill payer is. Those reliant on alternative heating fuels such as oil, bottled gas, and coal will be at particular disadvantage, as many will purchase this fuel without having consistent evidence that it is their source of household energy or that they are the bill payer. 1.5 million households in England lack a gas network connection and rely on these fuels to heat their homes³. Homes off the gas grid also endure a higher and deeper level of fuel poverty than those with a gas connection⁴. It is essential they are provided with a clear and accessible method of demonstrating who the bill payer is, alongside wider groups such as those paying for their energy indirectly (e.g. through a landlord or passthrough cost).

BEIS has made it clear that a household will not be eligible if they have already received EBSS support from the core scheme. It is essential that in cases where a vulnerable household accesses the Additional Funding scheme but have already received funding from the core scheme that they are not made to repay the second £400. From our research and extensive experience delivering Government support to some of the most vulnerable older households we are aware many older people find the Government's energy support schemes extremely complicated. With core EBSS funding being delivered to consumers via a staggered discount over the coming months it is likely many will remain unaware that they have already benefited from the EBSS and may go on to apply for the Additional Funding wing. BEIS must ensure that where a mistake has been made and a vulnerable household receives two lots of £400, they are not charged for the second

payment as this could further destabilise the finances of some of the most vulnerable households.

Finally, BEIS's decision to exclude dwellings which operate as businesses or business premises is likely to make it difficult for certain households to prove eligibility. While BEIS propose a welcome exemption in cases where the main business of the dwelling is the provision of long-term residential accommodation, the exclusion of dwellings which operate as businesses or business premises will make demonstrating eligibility challenging for certain groups (e.g. care home and park home residents). Any dwelling which constitutes someone's residential address must be included in the scheme and BEIS must minimise any risk that a household struggles to prove they are not a business. Some park home sites may operate temporary holiday lets alongside permanent park home residents, while many properties have dual status operating as a business by day and a home by night (e.g. pubs, cafes, salons). We are concerned this could result in residents having their applications rejected and BEIS must make sure that in these, and wider circumstances, people's homes are not excluded from EBSS Additional Funding.

Furthermore, care homes are both businesses and homes to some of the most vulnerable people in society. Older people living with multiple long-term conditions and coming towards the end of their lives are often more sensitive to temperature, and hypothermia can develop in vulnerable people after a very short exposure to cold weather or even in cold rooms. Heating & energy bills in residential care settings can therefore be particularly high. BEIS must unequivocally guarantee that care home residents fall within the scope of EBSS Additional Funding and do not fall through any gaps in provision or face issues with the application process. It is also important that BEIS considers how best to deliver this support to the bill payer – which in this case may be the care provider. We recommend that BEIS works with the care provider sector to develop an appropriate mechanism through which this support can be delivered.

Specific housing types who may miss out

Age UK are concerned about all residential households who face missing out on EBSS support. We wish to reinforce the importance of extending support to all residential dwellings, including those in Northern Ireland who presently face exclusion from the scheme, and the importance of minimising barriers to accessing support – including the potentially lengthy and complicated application forms proposed. Beyond this, we also want to highlight some of the issues faced by specific housing types which should receive EBSS Additional Funding support.

Park home residents are more likely to be aged 60 or older⁵. With 1,832 park home sites in England⁶, comprising an aggregate of 100,400 residential addresses, BEIS must ensure residents receive the £400 discount. Park home households remain unable to access a range of Government support because their electricity supply is often delivered via a single communal meter point – operated by the site owner and underpinned by a commercial

supply contract. While BEIS have proposed an application form to access EBSS Additional Funding we strongly encourage them to consider existing distribution mechanisms, such as the Park Homes Warm Home Discount industry initiative or a park home Council Tax rebate.

Age UK is also concerned that some older people reliant on communal heat networks to deliver their heating may miss out on EBSS support for similar reasons. Many of the 14,000 heat networks in Britain⁷ rely on a comparable arrangement to park home residents, with multiple residents having their supply underpinned by a commercial contract. While heat networks are generally responsible for delivering heating instead of electrical power, we are concerned that in some cases heat network users may pay for collective bills which include their electricity. BEIS should investigate this and extend EBSS Additional Funding to these households if they face missing out.

We are concerned about all households paying for their electricity bills through their rent, service charge or passthrough costs as they may face exclusion from the EBSS. Of particular concern is social housing tenants. While older households are more likely to be owner occupiers, older renters are more likely to be in the social housing sector. Age UK analysis⁸ shows that there are around 1.8 million social housing homes in the UK with at least one-person aged 60+ in residence. Around 80,000 of these pay for their energy through their rent⁹ which may result in barriers to them accessing EBSS support. BEIS must ensure that the EBSS Additional Funding wing supports households who pay for their energy through their rent, and this must include social housing tenants.

We also wish to highlight the issues faced by people in care homes trying to access the EBSS. There are just over 360,000 care home residents in England¹⁰. Many care homes operate as businesses which means residents are likely to face exclusion from the EBSS. It is essential that BEIS deliver support from the Additional Funding scheme to care home residents. Wider residential homes must also be supported alongside those relying on extra care, housing-with-support and housing-with-care arrangements.

Finally, while the precise number of households lacking an electricity connection is unknown, Age UK is aware of some who remain disconnected. BEIS has committed to delivering support to these homes but from experience we know this could prove difficult as many of these households are hard to reach. BEIS will need to eliminate barriers to accessing EBSS Additional Funding if it wants to support homes off the grid. This must include minimising the need to complete an application – delivering the scheme automatically wherever possible. We provide further detail on the issues with the application process in response to the questions below.

Consultation questions

1. To what extent will eligible groups be able to engage with an application process like this? Are there particular access issues we should be aware of?

Age UK is aware of the barriers faced by many older people in accessing Government support. 770,000 older people are not in receipt of their Pension Credit entitlement¹¹ – largely down to barriers to access. Older people also face wider obstacles to engaging with Government support, such as increased rates of digital exclusion¹², with two fifths of those aged 75+ not using the internet¹³.

BEIS must recognise that lengthy, complicated application forms will significantly reduce the number of people who apply for EBSS Additional Funding and increase the application attrition rate. Online only applications are of particular concern to us as they will inevitably exclude some of the most vulnerable older people. The biggest hurdle to successful application will be applicants struggling to provide evidence of eligibility (see introduction section ‘issues with eligibility criteria’).

Minimising the need for lengthy applications by providing automatic enrolment to the EBSS Additional Funding scheme should be the priority. Where this is not possible, the process of accessing the scheme should be straightforward and work with best practice from existing schemes. For example, when delivering to park home residents we recommend BEIS consider using the existing Park Homes Warm Home Discount industry initiative or a Council Tax rebate to provide support.

Where an application is required, it is essential BEIS comprehensively accounts for the needs of end users. Many older people face barriers to using smart phones, computers, and the internet. From experience delivering support to clients, we know that a straightforward user experience with multiple application routes (including by post, telephone, and online) and provision for someone to speak directly with a well-trained customer service team over the phone make all the difference. The Government must accept that this will entail investing money into the application process and customer journey. We would welcome the opportunity to work with BEIS to help ensure the user experience is as streamlined and accessible as possible for the older people we regularly work with and support.

2. In particular, are there any pieces of evidence that could be asked for in this application process (such as proof of identity or proof of one of the eligibility criteria) that particular groups would struggle to provide?

From experience, we are concerned that the older people most likely to benefit from the EBSS Additional Funding scheme are also the least likely to be able to prove eligibility. Proving housing tenure, ownership, place of birth, and bill payer status requires tenancy agreements, housing deeds, birth certificates and receipts which many of the most vulnerable older people won't have or will not be able to upload to BEIS's application system.

We recognise that it is extremely difficult to provide evidence demonstrating this point. As a result, Age UK have pulled together what evidence we can and combined it with our extensive experience of delivering support to many of the vulnerable clients the Additional Funding scheme is designed to help.

Government research into access to photo identification (ID) provides useful statistics¹⁴ on those who may struggle to prove eligibility. This also serves as a good proxy for some of the wider issues older people face in providing evidence and documentation to access Government support. At face value, holding photo ID varies only marginally by age group – with 99% of those aged 18-29 holding a form of photo ID, compared to 98% of both 30–69-year-olds and the over 70s¹⁵. Our main concern is the specific circumstances of the older people who do not hold ID, as we are worried this group is likely to be overrepresented within the target population that the Additional Funding scheme is aimed at. Furthermore, access to a form of ID is not the same as being able to present it as evidence (e.g. for those aged 85+ their ID is often less identifiable, with only 9 in 10 of this age group holding recognisable photo ID¹⁶).

It is important for BEIS to recognise that the groups of older people the scheme is designed to help (e.g. those lacking an electricity grid connection) are more likely to lack the evidence required to prove eligibility (e.g. photo ID or evidence of who the bill payer is). For example, those reliant on alternative heating fuels such as oil, bottled gas, and coal will be at great disadvantage as many will purchase this fuel without having consistent evidence that it is their household energy source or that they are the bill payer. This is why it is so important BEIS minimise the need for applications to access Additional Funding support and, where applications are needed, make them as straightforward and intuitive as possible – requesting only the essential evidence required.

Speed is also key. Distribution of EBSS core funding has already begun for most households. BEIS must ensure that its application process for the Additional Funding wing is straightforward to avoid delaying the scheme. During the winter months energy bills are generally higher as more and more people switch their heating on, increasing demand¹⁷. To ensure older households feel confident switching their heating on this winter it is absolutely essential they begin benefiting from the EBSS Additional Funding scheme before December when colder temperatures set in.

3. What are your thoughts on potentially allowing bulk applications?

Where people must apply to access the scheme a bulk application system could minimise the administrative burden on households. For example, BEIS could allow housing associations to file a single application for their entire stock of social housing units. Care homes could similarly file an application for all their residents collectively.

If BEIS implement this there are nonetheless issues to overcome. Firstly, it is important that a collective or bulk application delivers support to the intended beneficiaries, particularly as residents may be unaware that an application is being made on their behalf. In respect of care homes, BEIS will need to work with providers to ensure that the

application framework not only benefits care home residents, ensuring that their energy needs are met, but contributes to provider sustainability, ensuring the cost of energy bills can be met.

Secondly, it is crucial that no organisation fails to submit because they could not navigate the bulk application process or submit the required evidence within the timeframe. Therefore, the same principles should apply to both individual and collective applications – they should be straightforward and easy to access.

4. How do these groups learn about available support schemes? Are there particular ways they tend to access other forms of Government support?

With older people facing increased rates of digital exclusion¹⁸ and two fifths of those aged 75+ not using the internet¹⁹ they are far more likely than younger people to prefer offline access routes and promotional materials. Both the EBSS Additional Funding scheme itself and its promotional materials must be provided in both online and offline formats. Print media, radio and television ads will be crucial promotional routes while information provided via letters and community and voluntary organisations are also essential.

We recommend BEIS use relevant sector publications and proactive campaigns to specifically target groups they want to inform. This could include newsletters focused on off grid fuels like oil, coal, and bottled gas, as these fuels are disproportionately used by those off the electricity grid. BEIS could also partner with industry bodies who deliver these fuels to help promote energy bill support – including the EBSS Additional Funding scheme and the £100 Alternative Fuel Payment. For instance, industry partners could provide informational leaflets on the side of coal packaging or fund training for heating oil delivery drivers to hand out pamphlets and information on the scheme when they next deliver.

To get the message out to park home, care home, and social housing residents BEIS could adopt a similar approach and use relevant publications with high readership amongst these communities. This should include engaging with relevant industry stakeholders such as housing and care home associations and park home groups. We would be happy to work with BEIS to identify relevant publications and help distribute information on the scheme.

Age UK is also mindful that with an increased prevalence of cost-of-living scams it is important BEIS avoids putting out information which is itself misinterpreted as a scam. Age UK would welcome the opportunity to work with BEIS to minimise this risk as the scheme is rolled out.

5. In what form would energy bills support be most appropriate? Account transfers, vouchers, sub-meter credit, other?

To ensure maximal access to EBSS Additional Funding BEIS should provide multiple routes to access the £400 discount, ensuring people are able to receive it regardless of circumstances. While this may run the risk of a small number of households benefitting twice from the scheme, we are far more concerned with the much likelier risk of them not benefitting at all if BEIS only provides households with one route to redeem their £400.

While vouchers and Special Action Measures (SAMs) are a common preferred route for distributing support, and one BEIS is already using in the core wing of the EBSS, they are by no means a full proof mechanism for ensuring maximum access for older people. Previous attempts to get customers in the energy market to redeem vouchers or SAMs have had mixed results, particularly as the need for active consumer involvement in the redemption process seems to reduce access when compared with automatic enrolment systems²⁰. For example, the Government Electricity Rebate (GER) scheme delivered an annual £12 rebate to electricity customers between 2014 – 2016²¹. Ofgem's final report on the scheme found that up to 30% of customers reliant on a prepayment meter (PPM) did not access their GER vouchers²². This means well over two thirds (70%+) did still redeem their vouchers and this mechanism could therefore play an important role in providing EBSS Additional Funding support. However, our concern is making sure that it is not the only mechanism for accessing the scheme.

We encourage BEIS to use vouchers and SAMs as a baseline level of support and then provide multiple bespoke routes for different housing types. A great example is with park homes where BEIS should consider using the Park Homes Warm Home Discount industry initiative or a park home Council Tax rebate to distribute support. While these schemes will inevitably present their own issues, with vouchers and SAMs as a backup measure it will maximise routes into the scheme and minimise the risk of someone missing out because of a specific issue with one or the other route. BEIS could mitigate the risk of households redeeming two iterations of the £400 discount by using data matching processes so that vouchers are not distributed to a home which has already benefitted from the scheme.

Age UK would welcome the opportunity to work with BEIS to identify similar routes to provide support for care home, social housing, and off grid households. Crucially, we refer BEIS to our previous comment (see response to question 1) about the importance of automatic enrolment where possible as this would bypass the need for vouchers, SAMs or alternative arrangements.

6. How do we best get the message out to households that need the support?

With older people facing increased rates of digital exclusion²³ it is essential that all materials sent to consumers relating to EBSS Additional Funding are provided via online and offline formats. BEIS must promote the scheme through a broad range of sources, including print media, mail drops, and community and voluntary organisations. BEIS must also consider additional consumer communication requirements, for example where there

is a language barrier or someone has a relevant disability or long-term health condition (e.g. a visual impairment).

¹ Age UK, 2022. Consultation response: Technical proposals for the Energy Bills Support Scheme. Age UK. [Online]. Available at: <https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/consultation-responses-and-submissions/safe-at-home/consultation-response---technical-proposals-for-the-energy-bills-support-scheme-department-for-business-energy--industrial-strategy.pdf>. [Accessed 07/10/22].

² Age UK, 2022. Consultation response: Additional Questions: Technical proposals for the Energy Bills Support Scheme. Age UK. [Online]. Available at: <https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/consultation-responses-and-submissions/safe-at-home/consultation-response---technical-proposals-for-the-energy-bills-support-scheme-department-for-business-energy--industrial-strategy.pdf>. [Accessed 07/10/22].

³ BEIS, 2022. Fuel poverty detailed tables 2022. Department for Business, Energy, and Industrial Strategy. [Online]. Available at: <https://www.gov.uk/government/statistics/fuel-poverty-detailed-tables-2022>. [Accessed 25/09/22]. Table 13.

⁴ BEIS, 2022. Fuel poverty detailed tables 2022. Department for Business, Energy, and Industrial Strategy. [Online]. Available at: <https://www.gov.uk/government/statistics/fuel-poverty-detailed-tables-2022>. [Accessed 25/09/22]. Table 13.

⁵ HCL, 2019. Research Briefing: Mobile Park Homes. House of Commons Library. [Online]. Available at: <https://commonslibrary.parliament.uk/research-briefings/sn01080/>. [Accessed 22/04/22].

⁶ DLUHC, 2022. The impact of a change in the maximum park home sale commission. Department for Levelling up Communities and Local Government. [Online]. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1083506/Park_Homes_Research_Report.pdf. [Accessed 07/01/22].

⁷ BEIS, 2021. UK government announces major expansion of heat networks in latest step to power homes with green energy. Department for Business, Energy, and Industrial Strategy. [Online]. Available at: <https://www.gov.uk/government/news/uk-government-announces-major-expansion-of-heat-networks-in-latest-step-to-power-homes-with-green-energy>. [Accessed 16/10/22].

⁸ Age UK, 2022. Age UK analysis of Living Costs & Food Survey 2019-20.

⁹ Age UK, 2022. Age UK analysis of Living Costs & Food Survey 2019-20.

¹⁰ ONS, 2022. Care homes and estimating the self-funding population, England: 2021 to 2022. Office for National Statistics. [Online]. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/articles/carehomesandestimatingtheselffundingpopulationengland/2021to2022>. [Accessed 10/10/22].

¹¹ DWP, 2022. Income-related benefits: estimates of take-up: financial year 2019 to 2020. Department for Work and Pensions. [Online]. Available at: <https://www.gov.uk/government/statistics/income-related-benefits-estimates-of-take-up-financial-year-2019-to-2020>. [Accessed 25/09/22].

¹² Age UK, 2021. *Briefing Paper: Digital inclusion and older people – how have things changed in a Covid-19 world?*. Age UK. [Online]. Available at: <https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/reports-and-briefings/active-communities/digital-inclusion-in-the-pandemic-final-march-2021.pdf>. [Accessed 05/08/21].

¹³ Age UK, 2021. *Briefing Paper: Digital inclusion and older people – how have things changed in a Covid-19 world?*. Age UK. [Online]. Available at: <https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/reports-and-briefings/active-communities/digital-inclusion-in-the-pandemic-final-march-2021.pdf>. [Accessed 05/08/21].

¹⁴ Cabinet Office, 2021. Voter identification: photographic ID ownership in Great Britain. Cabinet Office. [Online]. Available at: <https://www.gov.uk/government/publications/voter-identification-photographic-id-ownership-in-great-britain>. [Accessed 23/10/22].

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- ¹⁵ Cabinet Office, 2021. Photographic ID Research. Cabinet Office: IFF Research. [Online]. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/984918/Photographic_ID_research-headline_findings_report.pdf. [Accessed 23/10/22]. Pg5.
- ¹⁶ Cabinet Office, 2021. Photographic ID Research. Cabinet Office: IFF Research. [Online]. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/984918/Photographic_ID_research-headline_findings_report.pdf. [Accessed 23/10/22]. Pg5.
- ¹⁷ Ofgem, 2021. Adapting the Price Cap Methodology for Resilience in Volatile Markets. Ofgem. [online]. Available at: <https://www.ofgem.gov.uk/publications/adapting-price-cap-methodology-resilience-volatile-markets>. [Accessed 30/12/21]. Pg10.
- ¹⁸ Age UK, 2021. *Briefing Paper: Digital inclusion and older people – how have things changed in a Covid-19 world?*. Age UK. [Online]. Available at: <https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/reports-and-briefings/active-communities/digital-inclusion-in-the-pandemic-final-march-2021.pdf>. [Accessed 05/08/21].
- ¹⁹ Age UK, 2021. *Briefing Paper: Digital inclusion and older people – how have things changed in a Covid-19 world?*. Age UK. [Online]. Available at: <https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/reports-and-briefings/active-communities/digital-inclusion-in-the-pandemic-final-march-2021.pdf>. [Accessed 05/08/21].
- ²⁰ Ofgem, 2017. Government Electricity Rebate 2nd annual report. Ofgem. [Online]. Available at: <https://www.ofgem.gov.uk/publications/government-electricity-rebate-2nd-annual-report>. [Accessed 09/05/22]. Pg8.
- ²¹ Ofgem, 2017. Government Electricity Rebate 2nd annual report. Ofgem. [Online]. Available at: <https://www.ofgem.gov.uk/publications/government-electricity-rebate-2nd-annual-report>. [Accessed 09/05/22].
- ²² Ofgem, 2017. Government Electricity Rebate 2nd annual report. Ofgem. [Online]. Available at: <https://www.ofgem.gov.uk/publications/government-electricity-rebate-2nd-annual-report>. [Accessed 09/05/22]. Pg8.
- ²³ Age UK, 2021. *Briefing Paper: Digital inclusion and older people – how have things changed in a Covid-19 world?*. Age UK. [Online]. Available at: <https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/reports-and-briefings/active-communities/digital-inclusion-in-the-pandemic-final-march-2021.pdf>. [Accessed 05/08/21].