

Consultation Response

Department for Business, Energy and Industrial Strategy (BEIS)

Fuel Poverty Strategy for England

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About this consultation

Fuel poverty is defined in the Warm Homes and Energy Conservation Act 2000 as:

A person [who] is a member of a household living on a lower income in a home which cannot be kept warm at reasonable cost. (known as 'Low Income High Cost', or LIHC).

In 2014, the government introduced in legislation a fuel poverty target for England to improve as many fuel poor homes as is reasonably practicable to a minimum energy efficiency rating of Band C, by the end of 2030.

The government are looking to update the fuel poverty strategy for England. This consultation has 2 aims:

- to publish an assessment of the implementation of the [2015 fuel poverty strategy](#) so far
- to seek views on proposals to update the fuel poverty strategy

Key points and recommendations

1. We agree in principle with the switch to a measure of Low Income Low Energy Efficiency (LILEE), but BEIS need to track the impact and numbers of people who will now be excluded under the new definition.
2. Those who will in future not be classed as fuel poor but still struggle with energy costs must be able to enjoy any support they received previously.
3. Older people are often the most disengaged energy customers and many will face high costs without necessarily being classified as fuel poor.
4. We believe that the new strategy should focus on local need and that local agencies such as local authorities should have a key role in decision-making.
5. Age UK supports the current Minimum Energy Efficiency Standards (MEES) milestones but there need to be specific national, regional and local plans in place to make them achievable.
6. Current and incoming regulations requiring landlords in the private rented sector to provide accommodation with at least an Energy Performance Certificate (EPC) rating of 'E' need to be enforced.
7. Age UK supports the 'Worst First' principle but more clarity is needed on how it will be implemented.
8. Winter and Cold Weather Fuel Payments play an important role in protecting some of the most vulnerable citizens and should be increased, at least in line with inflation.
9. The Government should consider the introduction of social tariffs for vulnerable energy customers.
10. The Government needs to be far more ambitious in its funding of energy efficiency. There should be a central funded programme that reflects the value of improving efficiency to the Exchequer, the wellbeing of millions of citizens and the climate.

Introduction

Age UK supports older people to keep warm and well at home in a variety of ways. Our long-running home energy projects support people through a combination of income maximisation, home energy checks and installation of energy efficiency measures. Alongside our programmes, Age UK supports older people with a range of energy information and advice on our website, via a national advice line and through the network of local Age UKs.

Our experience shows the importance of recognising that local decision makers often have the best understanding of how resources to combat fuel poverty and sub-standard accommodation should be used. It also shows that effective partnership working is challenging and often depends on local relationships and connections rather than top-down strategies.

1. Do you agree with the Government's proposal to update the fuel poverty metric to Low Income Low Energy Efficiency? If not, which metric would you prefer and why?

Age UK agrees with the principle of reframing the definition of fuel poverty around improving households' energy efficiency. We hope that this change will help better protect those who drift in and out of fuel poverty under the current measure. The change should also make it easier to track progress against fuel poverty targets and will unequivocally demonstrate the need to invest in energy efficiency to improve the lives of those in the greatest need.

The realities of increasing the numbers now classified as fuel poor will limit those able to be targeted for help within the current relatively modest funding commitments. BEIS will need to track the impact on the estimated 200,000 households that will be moved above the fuel poverty threshold as a result of the new measure and assess whether it is particularly affecting specific groups of people, for example vulnerable customers or people living in certain regions. If so, BEIS will need to consider what remedies are needed to support any such groups. As with any measure, it won't include all those that are struggling such as those living in EPC 'C' rated properties who still face high energy costs.

Whilst the consultation document notes that the update is 'not expected to affect policy eligibility in the near term', vulnerable groups and their representatives will want assurances the change will not disadvantage them financially, for example by affecting their state benefits, entitlements or the installation of energy efficiency measures, in both the short and longer term. BEIS will also need to track the impact on and numbers of those households that are just above the fuel poor threshold and whether they face poorer outcomes as a result of the policy change.

2. The proposed metric update – LILEE – would necessitate certain updates to the current methodology, namely as regards the high costs threshold, but the other aspects of the current LIHC methodology would not necessarily need updating. Do

you have views or evidence on whether Government should update those other aspects of the methodology on the introduction of LILEE, including the following:

- a. Household energy requirements calculation, including heating regime**
- b. Equivalisation factors, for fuel costs and for income**
- c. Income methodology**
- d. Fuel prices methodology**

The energy requirements should definitely consider all heating and lighting consumption. The income methodology takes the Warm Home Discount into consideration but makes the assumption that it is exclusively used to support energy costs – which may be rather unrealistic. Fuel prices should be those actually paid by consumers and not derived from average or regional data.

There also needs to be consideration that many owner-occupied properties will not hold a recent EPC rating (or have one at all). Data of similar properties can be used as a proxy but this will not necessarily produce an accurate rating and understanding of whether the household can be classified as being in fuel poverty and thus eligible for support.

3. Do you agree that Government should retain the current target and interim milestones?

We agree that the targets should be retained. However, for them to be effective, they need to be supported with practical proposals which will make their attainment achievable. Currently, there is no road map to set out which agencies (national, regional and local) have responsibilities in meeting the targets. The government need to consider what positive actions they can take to ensure that the targets are realised.

Current and incoming regulations requiring landlords in the private rented sector to provide accommodation with an EPC rating of at least 'E' are crucial in protecting those living in sub-standard housing. However, these rules are not being enforced and the implementation of future milestones will be pointless unless landlords in breach are pursued. BEIS need to work with local government to understand why existing rules are not being enforced. This is quite likely due to local agencies such as Trading Standards and environmental health lacking the practical, financial and legal resources needed to take enforcement action. Locally, there may also be concerns about the effect of enforcement on housing supply. BEIS needs to work with local agencies and landlords to promote the benefits and cost-effectiveness of making properties more efficient.

4. Do you have views or evidence on our proposal to add more detail on, and clarify, the meaning of the 'Worst First' principle, including the considerations raised above?

Age UK supports the 'Worst First' principle, whereby households with the largest fuel poverty gaps and with the lowest energy efficiency ratings are targeted first. There will always be a conflict between seeking to support a smaller number of the most vulnerable and using resources to target a greater pool of those in need. BEIS needs to provide greater clarification of the principle and positive examples and guidelines of how it should be understood and interpreted. Local decision makers such as those in local authority

housing or environmental health teams may be the best arbiters of how resources should be allocated. A 'street by street' approach can help target neighbourhoods with the greatest need and may help build local social capital and community understanding of the crucial role that efficiency can play in improving health and finances. Local co-ordination is very important to ensure that once a property has been identified as needing support that any efficiency measures are installed in as timely a manner as possible. The public will also desire any installation to be as unobtrusive as possible but some EPC 'F' and 'G' rated properties may require multiple installations to achieve the desired rating.

5. Do you have views or evidence on our proposal to add more detail on, and clarify, the meaning of the cost-effectiveness principle, including the considerations raised above?

As discussed in the response to Question 4, there will always be a balance between understanding the true cost of supporting the most vulnerable and reaching more people. We do not support a blind adherence to cost-effectiveness and local decision makers such as those in local authorities should be responsible for where resources are best utilised. As with the 'Worst First' principle, there needs to be further clarification as to how cost-effectiveness should be interpreted with a range of evidence and examples from across the country. There needs to be greater understanding of whether the cost-effectiveness principle defines a reasonable level of energy efficiency which will actually deliver the improvements needed to get properties into an EPC rating of 'C' and above. Cost-effectiveness also needs to be judged by its relevance to the individual households targeted for support.

Age UK's experience in running winter warmth and home energy projects has demonstrated that given the right circumstances, even inexpensive measures such as radiator panels can have an extremely positive effect in helping older people to stay warm and well at home, as the following case study demonstrates.

Mrs. Brown is in her 70's and lives alone in a large house. She has very little family in the area and is currently unable to use her car to get out and about. Mrs. Brown was referred to Age UK following a hospital discharge, as she had recently been admitted after becoming stuck in the bath for a long period, without her lifeline. After returning home, the weather had become considerably colder and it was becoming very difficult to stay warm in her home and recover from the spell in hospital. The home is large and is difficult to heat. All radiators are located on external walls and there are significant drafts and cold air coming through gaps around the front and back wooden 12 doors. Only one room was being used and heated and the remaining parts of the house were colder.

During Mrs. Brown's assessment, Age UK advised that installing heat reflector panels on all of the external radiators will greatly improve their heating efficiency and would reflect 45% of the heat back into the room. A total of 14 radiator panels were fitted to all external wall radiators in several rooms throughout the house. During the fitting, it became evident that the heat reflector panels were effectively reflecting heat back into the room and the temperature of the home was increasing without turning up the heating system. Insulation foam and draught excluders were fitted around the frames of the wooden front and back

doors. The gaps and cold draughts entering the property were eliminated and greatly improved the efficiency of the heating in the home.

During the assessment, Mrs. Brown was also supplied with energy saving lightbulbs to use in lamps and a nightlight on the landing which would help improve lighting during the evening and prevent trips and falls.

This case study shows the value of installing inexpensive energy efficiency measures and the positive impact they can have on the health, wellbeing and finances of older people. Government, local authorities and industry should explore show similar schemes, which use a targeted local approach, can provide energy efficiency benefits to the most vulnerable. Between 2011-2014, the programmes supported nearly 16,000 older households with 76,454 energy efficiency measures installed¹. The average cost of a two hour visit including labour and equipment was £110 with the estimated average fuel bill saving of £56 per household, meaning the costs of a visit are recovered within two years².

6. Do you have views or evidence on our proposal to add more detail on, and clarify, the meaning of the vulnerability principle and, in particular, on our proposed changes to the meaning of the principle?

It is positive that Ofgem has been taking an active and considered approach to supporting vulnerable consumers and that the final fuel poverty strategy will sit alongside and complement this. Driving through positive change in the energy sector will also hopefully have the effect of improving and embedding support for vulnerable customers across all essential service markets.

Vulnerability to fuel poverty needs to be considered in the round, it is not just a reflection of the physical characteristics of a property but linked to tenure, household expenditure, health conditions etc. Vulnerability for many is not a consistent state but a combination of personal circumstances which will affect the majority of consumers at some point over their lives. As a result, it must be as easy as possible for consumers to engage and self-identify for support. Age UK would support discussions around the development of social tariffs for the most vulnerable energy customers. A pooled approach – cross-subsidy by both bill payers and the government - would reflect this fluid state of vulnerability and how many of us will experience it in our lifetimes.

As 200,000 households will now not be classified as fuel-poor, BEIS will need to provide greater clarity of how any older and vulnerable residents in EPC rated A-C properties will be supported as part of any 'vulnerability principle'.

7. Do you agree with our proposal to create a fourth principle on aligning fuel poverty strategy with current and future Government priorities? Do you have views or evidence that may be useful in creating this principle?

The proposal is a welcome development at a time when the public are increasingly aware of the impact of climate change. It is crucial that the fuel poverty strategy is aligned with

other 'green strategies' and the cross-Government commitment to net-zero carbon emissions by 2050.

In adhering to a 'Worst First', principle the strategy also needs to be aligned with other agendas such as banning the use of coal and the ban on gas boilers in new-build properties from 2025. We appreciate the conflict in supporting those off the gas grid but resources may be best used to install lower-carbon heating alternatives rather than connecting properties to it. Local decision-makers will still need to make sure that any alternatives are suitable for individual households. The strategy should also be aligned with positive future innovation such as improved boiler technology. This may especially benefit older people many of whom rely on older, inefficient boilers and have expensive repair contracts to maintain them.

The Government should also consider the creation of a collective purchasing scheme for new boilers which would allow them to be purchased with efficiencies of scale and then sold at reduced cost – for example it is conceivable that boilers could be sold through local authority energy suppliers.

All customers should be able to benefit from changes brought about by the Smart Energy programme and smart appliances. Innovation can help reduce costs and energy demand, promote independence and make it easier for consumers to be engaged with their energy supply. Those who are retired may be able to be more flexible in their consumption compared to those of working age and thus be more likely to benefit from time-of-use-tariffs.

Tackling fuel poverty must also include the cost of increased fuel consumption associated with extreme temperatures at any time of the year. This does not just mean in the cold, but also during hot spells, when people need to have the financial resources to ventilate, de-humidify and cool their homes.

8. Would you suggest any other guiding strategic principles? Do you have any other views or evidence on the guiding principles?

The introduction of Flexible Eligibility has shown a welcome departure from previous approaches. We believe a principle of being led by and focussed on local need should underpin the new strategy.

In addition, engagement with individuals and community groups is very important. Households in fuel poverty may not be aware of what support is available and some may have to be convinced about the benefits of home improvements, particularly if they involve significant disruption. Ensuring public support for the initiative at both a national and local level should be a key objective.

It is also crucial that social landlords are aware of their commitments under incoming MEES regulations and have the necessary works in place which may require significant investment and a long lead-time.

9. Keeping in mind the strategy's guiding principles, what policies might be included in a policy plan to improve energy efficiency for households in fuel poverty?

We believe that ECO should be complemented by central Government funding which would send a clearer signal of the Government's commitment to reducing fuel poverty and carbon emissions. Increasing central funding of energy efficiency would reduce the need to exempt new suppliers and therefore increase innovation, choice and competition in the energy market.

The Committee on Fuel Poverty has shown how far behind the target and milestones the current performance has slipped, and suggests that this amounts to a funding shortfall of £17 billion over the years to 2030³. Commitments in the Clean Growth and Industrial Strategies cannot disguise the fact that energy efficiency has fallen down the agenda. The number of energy efficiency measures installed fell 87 per cent in the five years to February 2019, from their peak in March 2014⁴.

Whereas ECO has been focussed on the energy companies, it is our firm view that local authorities and health authorities, need to be engaged too. Addressing fuel poverty is a crucial part of their responsibilities.

The work of Age UK's local programmes and of home improvement agencies demonstrates that energy efficiency improvements cannot be carried out in isolation and a series of works may be needed to bring homes to an acceptable standard. There needs to be a clear link to the Government's housing policies such as addressing air quality, mould and damp and making sure all necessary repairs, such as to windows and doors are undertaken.

10. What commitments, whether new or retained from the 2015 strategy, might supplement the policy plan in the updated strategy to improve energy efficiency for households in fuel poverty?

Learning from Age UK's local programmes shows that the behaviour change element of efforts to improve energy efficiency is often underestimated. While properties might get insulated to the adequate standard, if the public aren't advised on how to use systems efficiently, or indeed on the health implications of extreme temperatures, these investments are potentially at risk.

There also need to be initiatives and support to help drive behaviour change for owner-occupiers. Older people who don't foresee themselves moving imminently, if at all, may therefore be some of the biggest beneficiaries of making their property more efficient and reducing their energy costs.

11. Keeping in mind the strategy's guiding principles, what policies might be included in a policy plan to improve partnership and learning on fuel poverty?

Feedback from local Age UKs confirms that agreeing referral pathways with healthcare organisations is often extremely complex and time-consuming. Establishing these pathways is often dependent on personal connections rather than top-down led strategies.

Cross-sector policies should be agreed in order to embed collaborative approaches into everyday ways of working. The third sector has played a huge part in picking up the slack when it comes to winter pressures that GPs and hospitals have experienced so it would be helpful to embed this partnership working in the system. Age UK's programmes have shown that many older people have complex needs, so collaboration should focus on addressing these.

12. What commitments, whether new or retained from the 2015 strategy, might supplement the policy plan in the updated strategy to improve partnership and learning on fuel poverty?

13. Keeping in mind the strategy's guiding principles, what policies might be included in a policy plan to improve targeting for households in fuel poverty?

Targeting has been a challenge for several successive energy efficiency programmes. We support the use of data matching and use of Department of Work and Pensions statistics on benefit recipients for entitlement to things like Pension Credit. Data-matching needs to be part of a blended approach to supporting the most vulnerable as many will not be claiming the benefits they are entitled to. There are 1.3m older people eligible for pension credit who are not claiming it⁵.

This is why we support a comprehensive street-by-street approach, led by local authorities, to identify and support households at risk or in fuel poverty. Referral processes need to be better embedded between local agencies and landlords. This would also include identification of properties likely to be at particular risk such as park homes.

14. What commitments, whether new or retained from the 2015 strategy, might supplement the policy plan in the updated strategy to improve targeting for households in fuel poverty?

15. Keeping in mind the strategy's guiding principles, what policies might be included in a policy plan to support households in fuel poverty in high cost homes?

True behaviour change is complex and difficult for consumers – perhaps more so for those who are older, vulnerable and disengaged. The Government should consider incentives for these groups, as well as additional steps to engage them.

Homes with high costs to keep adequately warm will probably be those where improving the energy efficiency will also be expensive, such as solid wall properties. The Green Deal and other recent incentive schemes may only have had the effect of benefitting those of greater means, particularly owner-occupiers.

16. What commitments, whether new or retained from the 2015 strategy, might supplement the policy plan in the updated strategy to support households in fuel poverty in high cost homes?

17. Keeping in mind the strategy's guiding principles, what policies might be included in a policy plan to improve support for low income households who are most at risk for adverse health outcomes from living in a cold home?

The consultation document rightly points out that people admitted for treatment in hospital should be entitled to some support before they are discharged, and a cold home could be a factor in both contributing to their poor health and preventing a full recovery. There will be those whose health needs include living in a higher ambient temperature than the standards generally recommend, which should be factored in to cost-effectiveness calculations. The impact of living in a cold home can also worsen older people's social isolation.

Approaches to supporting vulnerable households through the Fuel Poverty Strategy should be aligned with a public health approach to keeping people warm and well. Previous work from Public Health England (PHE) demonstrated the clear ambition of reducing fuel poverty as part of an overall strategy for improving health outcomes and reducing inequalities⁶. It is unfortunate that the PHE strategy from 2020-2025 does not explicitly mention fuel poverty, but the strategy's guiding principles (keeping people safe, preventing poor health, reducing inequalities and supporting a strong economy⁷) could all be interpreted as relevant. Public health guidance can be considered alongside the NICE guidelines on tackling cold-related ill-health and excess winter deaths, particularly the recommendations which support multi-sector approaches.

The Health Booster Fund is an example of positive approaches to reducing the impact of cold homes but £1m of funding is wholly insufficient when considering the overall detriment and cost to the public purse.

18. What commitments, whether new or retained from the 2015 strategy, might supplement the policy plan in the updated strategy to improve support for low income households who are most at risk for adverse health outcomes from living in a cold home?

19. Keeping in mind the strategy's guiding principles, what policies might be included in a policy plan to decrease the financial burden of energy bills for households in fuel poverty?

We cannot overstate the importance of Winter and Cold Weather Fuel Payments in protecting older and vulnerable consumers. Despite some changes, the £300 received by those aged 80 and over as part of the Winter Fuel Payment has not increased since 2003/04⁸. This is despite the average annual domestic gas bill for a home supplier increasing by 150% from £287 in 2003 to £719 in 2018⁹. Older and vulnerable households will likely face even higher energy costs due to not being on the cheapest tariff and higher

energy consumption, in part due to energy inefficient homes and related health conditions. Both payments should be updated, at the very minimum in line with inflation, to protect the most vulnerable from rising energy costs.

Similarly, whilst the Warm Home Discount Scheme is welcomed by many of the most vulnerable households, the level of support, £140, has remained the same since 2014/15 and is assumed to stay at that amount until 2020/21. Many older and vulnerable people may not receive support due to not registering during the application period, missing out on their supplier's funding allocation, not being eligible for either the core or broader group or because their supplier does not offer it.

20. What commitments, whether new or retained from the 2015 strategy, might supplement the policy plan in the updated strategy to decrease the financial burden of energy bills for households in fuel poverty?

21. Keeping in mind the strategy's guiding principles, what policies might be included in a policy plan to create a fairer energy market for households in fuel poverty?

The Government's perception of an effective and fair energy market is based on the incidence of switching and how easy householders find the process of choosing a tariff and switching to it. There is an expectation that consumers need to switch to secure the most affordable energy deal but older and vulnerable customers face significant barriers in doing so. Ofgem's Engagement Survey shows that those 65+ are the age group least likely to be engaged with the energy market, compare prices or switch supplier¹⁰. Price comparison websites are a key way of engaging with complex markets. There is an assumption that all customers will use these sites but older people who are digitally excluded face missing out on a more affordable tariff. Older people faced with an increasingly fragmented and complex energy market, will also need reassurances about the continuation of any support and discounts they receive when they switch supplier.

22. What commitments, whether new or retained from the 2015 strategy, might supplement the policy plan in the updated strategy to create a fairer energy market for households in fuel poverty?

Less engaged consumers may find themselves stuck on an expensive standard variable tariff, and paying a loyalty penalty. Energy price caps help provide a level of protection but need to be embedded as permanent rather than temporary measures to improve the affordability of energy. Whilst the price caps are welcome, we note that customers on default tariffs will still face paying more for their bills this winter than they were in January 2019 when the cap first came into force. Given that as of July 2019, the difference between the average standard variable tariffs and market cheapest tariffs is approximately £408¹¹ (with disengaged customer likely paying even more), the level of financial protection offered by price caps needs to be significant to make a difference to people's lives.

The Consultation document draws attention to the Big Energy Saving Network, and this is a valuable support agency with its trained energy champions. However advice organisations face huge challenges as the smart meters programme rolls out and consumers need support to use them effectively.

23. Keeping in mind the strategy’s guiding principles, what policies might be included in a policy plan to improve the evidence base on fuel poverty?

There needs to be better information on health to make the connection with living in a cold home. Excess winter deaths in 2017/18 were at their highest level since 1975/76¹². The number of excess winter deaths for older people in England and Wales increased by 43% between 1991/2 (32,100) and 2017/18 (45,900)¹³. Whilst factors other than cold homes contribute to excess winter deaths¹⁴, sustained periods of cold weather will test the finances of older people and leave them more exposed to related health conditions.

There is a lot of data on fuel poverty but too often there is an inconsistent approach to prioritisation and which measures could be installed. Local authorities should have access to data on housing stock within their localities as well as on health indicators (such as hospital admissions due to cardiovascular/ respiratory conditions) and this data could be utilised to agree a street-by-street approach for tackling fuel poverty in a more systematic way. The current approach of different agencies responding at different times, which is often accompanied by a lack of communication, can lead to duplication and wasted resources.

24. What commitments, whether new or retained from the 2015 strategy, might supplement the policy plan in the updated strategy to improve the evidence base on fuel poverty?

It would help if the Government committed to review the objectives and performance of Public Health England and the NHS Five Year Plan (which does not explicitly mention the impact of fuel poverty) in light of the impact of living in a cold home.

25. Are existing arrangements sufficient to meet our commitments to review and scrutinise Government action on fuel poverty?

The Government has its own advisory group, the Committee on Fuel Poverty. Its annual reports have warned of the mis-match between the targets and milestones established in 2015 and the rate of progress (or lack of) towards those objectives. By relying on energy suppliers to deliver the programme, and refusing to commit any of its own resources, the Government has hobbled its ability to take effective action in England. The Government must commit to ‘review and scrutinise’ what it is achieving in England, and compare outcomes with what the devolved governments are achieving.

26. Do you have any further views or evidence on how the 2015 fuel poverty strategy should be updated?

The emphasis to date on providing the most cost-effective remedy to households in fuel poverty has resulted in a fragmented and piecemeal outcome. The benefits of working on an area-based approach, and adopting a whole-of-house improvement programme, have long been demonstrated. This requires an enhanced role for local authorities and the promotion of partnerships between them and the energy suppliers.

¹ https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/evaluation-reports/winter_warmth_impact_report.pdf

² https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/evaluation-reports/winter_warmth_impact_report.pdf

³ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/754361/Committee_on_Fuel_Poverty_Annual_Report_2018.pdf

⁴ <https://www.gov.uk/government/statistics/household-energy-efficiency-statistics-headline-release-august-2019>

⁵ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/757268/income-related-benefits-estimates-of-take-up-2016-17.pdf

⁶ https://fingertips.phe.org.uk/documents/Fuel_poverty_health_inequalities.pdf

⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/831562/PHE_Strategy_2020-25.pdf

⁸ <http://researchbriefings.files.parliament.uk/documents/SN06019/SN06019.pdf>

⁹ <https://www.gov.uk/government/statistical-data-sets/annual-domestic-energy-price-statistics>

¹⁰ https://www.ofgem.gov.uk/system/files/docs/2018/10/consumer_engagement_survey_2018_report_0.pdf

¹¹ <https://www.ofgem.gov.uk/data-portal/retail-market-indicators>

¹² <https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/deaths/bulletins/excesswintermortalityinenglandandwales/2017to2018provisionaland2016to2017final>

¹³ <https://www.ons.gov.uk/file?uri=/peoplepopulationandcommunity/birthsdeathsandmarriages/deaths/datasets/excesswintermortalityinenglandandwalesreferencetables/2017to2018provisionaland2016to2017final/reftableewm201718.xls>

¹⁴ <https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/deaths/bulletins/excesswintermortalityinenglandandwales/2017to2018provisionaland2016to2017final>