



# AFFORDABILITY AND DEBT IN THE DOMESTIC RETAIL MARKET

Changeworks' Response to Ofgem's Call for Input  
May 2024

**CHANGEWORKS.**

# Table of contents

<b>Energy affordability and impacts on consumers</b>	<b>4</b>
1. What are the key drivers of energy affordability challenges and how do we expect those to change in the future?	4
2. What options should be explored to tackle energy affordability?	6
<b>Impacts of affordability and debt issues on the market</b>	<b>9</b>
3. What options should be considered when redistributing costs?	9
<b>Addressing the affordability and debt challenge</b>	<b>11</b>
6. What represents best practice in debt management by energy suppliers?	11
7. What lessons can we learn from other sectors and countries on managing affordability and debt? And how should they be applied to the energy sector?	13

# About Changeworks

Changeworks is a leading consultancy, research, and programme delivery organisation, with over 35 years of experience of decarbonising Scotland's homes. We continue to invest in services that will enable householders to reduce both their energy bills and their carbon footprint.

Our Affordable Warmth Services team provides energy efficiency, fuel poverty and energy debt advice to people across all of Scotland. Over the previous financial year (2023-2024), Changeworks has supported 67,020 households with savings through energy efficiency advice, tariff switching, debt and billing support, access to grants, and more. Our advisors work extensively with clients and energy providers. We understand the impacts of affordability challenges, especially for customers living in fuel poverty, and both the causes and symptoms of accruing energy debt.

Without any additional support, millions will sink further into debt, and many will turn off the heating, leaving them at acute risk of serious ill-health<sup>1</sup> and putting further unwanted strain on our stretched health services<sup>2</sup>.

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<sup>1</sup> [Public Health England - Fuel poverty health inequalities.pdf](#)

<sup>2</sup> [NEA-policy-briefing-supporting-vulnerable-energy-customers-this-winter-updated-260122.pdf](#)

# Energy Affordability and Impacts on Consumers

## 1. What are the key drivers of energy affordability challenges and how do we expect those to change in the future?

### Cost of living crisis

- Ofgem needs to consider that energy affordability challenges are not only due to the increases in the price of energy. **Even if energy prices come down, people will continue to struggle with the energy debt that has built up as a result of rising costs.** Ofgem should consider that any actions that are taken to tackle affordability will impact people in very different starting positions. Affordability needs to be understood within the context of wider household circumstances, including those that have accumulated significant energy debts.
- The cost of living crisis has exacerbated people's ability to pay, including the cost of rent, increasing interest rates on mortgages, food prices, and fuel and transport costs. It is important that Ofgem views this as an **enduring issue** that is impacted by rising costs of all basic necessities, rather than just the price of energy. As all of these costs have increased, benefits and wages have stagnated, and debt has built up as a result of these wider affordability challenges. In an attempt to manage rising costs, householders have increasingly engaged in self-rationing behaviours which pose risks to both building and occupant health<sup>345</sup>. These impacts are experienced disproportionately by vulnerable groups<sup>6</sup>.
- Affordability challenges are faced by those who are both generally unable to afford their energy bills due to a myriad of circumstances, as well as those who can usually afford their bills but may enter a debt cycle when an emergency one-off unforeseen financial shock prohibits their ability to pay. Affordability challenges are also phased by consumers that could afford a 'usual' energy usage, but have particularly high energy demand needs due to immobility, vulnerability to cold, or reliance on expensive to run medical equipment.

### A need for systematic changes based upon preventative action

- Changeworks' Affordable Warmth advice team has highlighted that **the situation regarding affordability and debt is not temporary, but systemic** and should be viewed in a broader context than the period over which the price-caps have been introduced. The team has seen a gradual worsening of people's ability to afford energy and debt challenges even before the cost of living crisis. Changeworks calls for systematic change in the way energy costs and energy debts are paid and handled, as reactionary policies – such as short-term financial awards and the existing price caps – would only be effective if lower energy prices could be guaranteed.

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<sup>3</sup> [Understanding and addressing the health risks of damp and mould in the home - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/644442/Understanding_and_addressing_the_health_risks_of_damp_and_mould_in_the_home_-_GOV.UK.pdf)

<sup>4</sup> [National Energy Agency response to Ofgem's Self-disconnection and Self-Rationing Final Proposals – Statutory Consultation\\_response.pdf \(ofgem.gov.uk\)](https://www.ofgem.gov.uk/statutory-consultation-response/pdf/national-energy-agency-response-to-ofgem-s-self-disconnection-and-self-rationing-final-proposals)

<sup>5</sup> [Health and Moisture in Buildings report - UK Centre for Moisture in Buildings \(ukcmb.org\)](https://www.ukcmb.org.uk/health-and-moisture-in-buildings-report)

<sup>6</sup> [Health, Disability and the Energy Crisis \(HTML\) | Consumer Scotland](#)

- **A one-size fits all response is not enough**, as affordability challenges are not universal and, for many, are not short term. Consideration needs to be given to how the energy efficiency of the home itself directly impact upon the affordability of energy for heating. Properties in rural, remote areas face significant challenges, both because a lack of access to the gas grid results in higher fuel costs and because exposed homes (especially in the North of Scotland and the islands) have higher energy demands to heat to an adequate temperature<sup>16</sup>. The frequency of extreme weather events is higher in rural areas, which can result in power outages, resulting in a greater need for back-up electricity sources and back up heating systems which are often expensive<sup>16</sup>.
- As Ofgem has pointed out in the Call for Input document, energy costs are impacted by market shocks and global events and could rise again. Given the volatility of the market, some consumers need to be better cushioned and protected from external factors. **Customers that require additional support to be able to afford their energy** may include elderly people, people living on low income, certain benefits recipients, and those that have high energy demand due to operating medical equipment or managing health conditions that require warmer homes.

### A move towards the electrification of heat

- **Fuel poverty reduction and decarbonisation are intrinsically linked.** Relying on oil and gas for home heating leads to higher, unaffordable energy bills and produces almost 13% of Scotland's carbon emissions<sup>7</sup>.
- However, **as the UK moves towards electric heating systems, energy affordability challenges are likely to be exacerbated without proactive policymaking.** Electricity costs are currently much higher than gas prices due to current levies on electricity<sup>8</sup>. As homeowners and landlords move towards electric heating systems or connect to heat networks, options should be considered to ensure that end-use costs are reasonable and comparable to gas prices. This is necessary to incentivise homeowners to install clean, electric heating systems.
- Changeworks is concerned that the Scottish Government's Heat in Buildings Bill, in its current form, is focused exclusively on decarbonising heating. Some of the proposals set out in the Heat in Buildings consultation document may push people further into fuel poverty. Ofgem should consider the impact that any approaches to tackle affordability and debt challenges would have on people who (will) rely on electric heating systems, and especially those that live in energy inefficient homes and have high rates of heat loss.
- **Homes in the UK (and Scotland in particular) are some of the least energy efficient in Europe and current levels of fuel poverty should be considered a crisis.** Around 35% of Scottish households are in fuel poverty<sup>9</sup>, and over 50% of homes have an Energy Performance Rating of D or below<sup>10</sup>.

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<sup>7</sup> Chapter 2 A 2045 Pathway for Scotland's Homes and Buildings - Heat in Buildings Strategy - achieving net zero emissions in Scotland's buildings - gov.scot ([www.gov.scot](http://www.gov.scot))

<sup>8</sup> Energy & Climate Intelligence Unit | Energy bills: getting the balance right ([eciu.net](http://eciu.net))

<sup>9</sup> The Scottish Parliament: Written answer to Question S6W-14736: To ask the Scottish Government how many households in each local authority areas have been estimated to be in fuel poverty in each year since 1999.

<sup>10</sup> Energy efficiency in homes - Energy efficiency - gov.scot ([www.gov.scot](http://www.gov.scot))

- Recent analysis by the Energy and Climate Change Intelligence Unit (ECIU) found that, under Ofgem's price cap from January 2024, homes with poor insulation (EPC band F) will be an average of £730 worse off per year than homes with an EPC band C)<sup>11</sup>.
- In the UK, the most vulnerable – and most in need of protection from price shocks - are seeing rising costs at a disproportionate rate due to the **widening energy efficiency gap**<sup>12</sup>.
- Ofgem should give consideration to the fact that many householders – such as private rented sector and social housing tenants – are not usually empowered to choose their heating system or to insulate their homes. As the UK transitions to electric heating, there is a risk that landlords will install cheaper electric heating (such as older, inefficient storage heaters and electric panel heaters) that are generally significantly less efficient to run than gas central heating.
- **Changeworks recommends that the smart meter roll out be accelerated** to ensure benefits of TOU can be accessed evenly. Householders that have installed heat pumps will only be able to benefit financially from TOU tariffs if the property is energy efficient. However, we believe with sophisticated controls, demand side management can be applied to heat pumps without a significant impact on the efficiency of the heat pump system.

## 2. What options should be explored to tackle energy affordability?

### Electric heating

- The UK government should **review levies on electricity to ensure that end-use costs of energy are affordable** as the UK transitions away from gas and towards electric heating. Changeworks recommends these levies should be removed. If this cannot be achieved for all consumers, customers living in poverty (and fuel poverty) should be prioritised. Key actions could serve as trigger points for this, such as the installation of an electric heating system by the landlord.
- Further options should be explored to ensure that end-use costs are affordable, as cheap to install electric heating systems often have the highest running costs. Landlords may be more likely to install these systems - such as older, inefficient storage heaters and panel heaters - which results in those who are often already the least able to pay for their energy (private and social renters) and more likely to accrue energy debt being disproportionately affected. They are also not in a position to change their heating system if this is the case.
- The ability to access on-peak and off-peak tariffs have not adequately shielded customers from rising prices over the last few years and should be not relied upon going forward. New forms of electric heating tariff could be introduced.
- Further regulatory actions should be explored to ensure that the transition to electric heating does not worsen fuel poverty and increase the prevalence and deepening of energy debts.

<sup>11</sup> [Energy & Climate Intelligence Unit | Energy bill price cap: poorly insulated homes to cost over £400 more to heat next year \(eciu.net\)](https://www.eciu.net/news/energy-bill-price-cap-poorly-insulated-homes-to-cost-over-400-more-to-heat-next-year)

<sup>12</sup> [The most vulnerable shoulder rising energy costs because their homes aren't efficient enough | University of Leeds](https://www.leeds.ac.uk/news/the-most-vulnerable-shoulder-rising-energy-costs-because-their-homes-aren-t-efficient-enough)

## Ability for consumers to choose their suppliers and meters

- As it stands currently, **consumers are locked into contract with their energy suppliers if the debt is over £500**. Those who have been the most impacted by the increases in energy costs and built up energy debt often face much higher levels of debt. Advice services are often limited in advice that can be given to clients that face such high levels of debt. Usually, customers are encouraged to shop around for better tariffs when they contact advice services when they are unable to afford their debts, and handholding is often required to enable this possibility. Ofgem needs to consider that regulations could be introduced to ensure that customers facing high levels of energy debt should be able to choose their supplier and tariff regardless of previous debt built up. Greater flexibility would better enable customers to pay off energy debts, if they are able to bring down ongoing energy costs. This would also incentivise good practice of debt management by suppliers.
- Changeworks' Affordable Warmth advice team has found that many people have faced challenges in getting pre-payment meters installed at their own request, despite suppliers offering this option to customers. It seems as though the suppliers and contractors are not being held responsible for this, and an exploration into why this is happening – and requirements upon energy suppliers to meet these obligations – would be beneficial in enabling meaningful choices for consumers who are trying to best manage energy costs to avoid falling into debt, and to avoid accumulating debt in the future.

## A social tariff

- Changeworks recommends the introduction of a **non-voluntary social tariff**. This would systematically differentiate between those who won't pay for their fuel and accrue energy debt as a result of this, and those who can't pay, and therefore are unable to avoid getting into debt, and often are unable to pay such debt off.
- Moving away from a price-cap system to a social tariff would make **it easier for consumers to make informed decisions** about their energy tariff options and suppliers. Under the price-cap system, it is difficult for consumers, as well as energy advisors, to know what prices are going to be in real terms in the near and far future. Hence, customer choice is constrained by limited knowledge of what options are available, which best suit their needs, and how these may change in the future.
- It is often difficult for customers with a range of vulnerabilities to navigate the support they are entitled to. A social tariff should be implemented and **eligible households should have automatic access** to this. Information could be shared between a newly designed social tariff system and the Priority Service Register, for example, to enable this. At a minimum, the Warm Home Discount and other financial support schemes should also be automated to remove administrative barriers and the 'luck of the draw' approach taken by some suppliers. However, Changeworks advises against relying on the previously taken reactive financial aid approach. This is often a 'sticking plaster' that does not tackle the systemic causes of debt and affordability challenges. Administering financial awards retrospectively does not prevent people from falling into energy debt, and is often used only to pay off the debts, rather than relieving pressure from ongoing energy bills that remain unaffordable for many.

## Even access to competitive tariffs

- **Many new tariffs are only available to those with smart meters.** Currently, many customers cannot access such tariffs as their properties are unsuitable for smart meters. Market intervention could help in redistributing opportunities for choice between tariffs more evenly, helping people to avoid getting into energy debt.
- **Smart meter installations should be prioritised for people that are in fuel poverty or classed as vulnerable** as this would support access to the wider range of tariffs available.
- To usefully access and benefit from new, diverse tariffs, customers need to be engaged and able to understand quite complicated sets of information to make the initial tariff choice that is best suited to their personal home, behaviours and needs. The people who are most likely to benefit from new innovative tariffs are those that have smart technologies in the home and have the capacity for regular and ongoing engagement. This results in the most disadvantaged people (who typically require the most support to ensure affordability and debt prevention) being the least likely to benefit from such tariffs<sup>13</sup>.
- Changeworks urges that a social tariff is needed to ensure that those facing the greatest disadvantages are able to access associated benefits, such as energy prices identical to (or lower than) the best price options available to householders with the capacity and smart technologies available to choose such tariffs.

## Energy efficiency

- Whilst this is not within Ofgem's remit, Changeworks urges the UK Government to ensure that **adequate insulation schemes and financing mechanisms for retrofit** are available for householders across the UK. Another method of insulating households from price shocks (and to avoid energy debt from heating costs) is by ensuring homes are adequately insulated to reduce heat loss.

## Improved guidance and increased transparency

- **There is currently a lack of transparency around how much energy costs on different tariffs.** This information is made deliberately inaccessible by some suppliers. Regulations should require (rather than recommend) that price per unit costs are easily accessible through open publication on supplier websites. If this information were clearly shown, third sector advisors providing support to vulnerable customers would be able to access this information (without clients needing to log in to account or set up accounts to obtain quotes). **This would better enable customers to ensure they are with the tariff and supplier that works best for them, which would place people in a better position to avoid falling into debt.** Instead, websites often offer information such as 'an average three bed house will cost £X amount per month' which is inadequate and misleading given variances in energy efficiency and heat loss dependent on the property.

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<sup>13</sup> [Changeworks \(2022\). Supporting Vulnerable Consumers to Access Dynamic Time of Use Tariffs: Full Research Report.](#)



# Impacts of Affordability and Debt Issues on the Market

## 3. What options should be considered when redistributing costs?

### A fairer regional pricing system

- **Standing charges are regionally different, which is unequal.** Households in London, for example, pay significantly less than households in Scotland and the Northwest. This was originally justified through the reasoning that residents in such households lived further away from energy production and that these price differences offset transportation costs. However, with the move towards renewable electricity generation, this is no longer the case. Households positioned in geographical proximity to generation are still paying more for their energy. According to the Scottish Government's house condition survey, fuel poverty afflicted 31% of Scottish households in 2022<sup>14</sup>.
- Currently, those living in remote rural areas typically pay significantly higher energy costs. In northern areas and the islands, the proportion of households in fuel poverty was almost, or even over, 50%. Those are the parts closest to the oil and gas fields, yet they are denied access to affordable fuel<sup>15</sup>.
- The **regional pricing structure should be reformed** to ensure that households in rural areas are not required to pay more. Remote rural areas are already at greater risk of fuel poverty due to a myriad of factors, such as less energy inefficient housing stock, greater exposure to extreme weather events, limited fuel options where properties cannot connect to the gas grid, and difficulties accessing the supply chain to improve the energy efficiency of homes<sup>16</sup>.
- **Consideration needs to be given to the fact that those not connected to the gas system were left behind** during the energy crisis due to the price cap not applying to such households. Many of these households rely upon more expensive fuel types for heating, such as coal, oil boilers, LPG and solid fuel. This needs to be considered when redistributing costs.

### Rising standing charges

- Changeworks welcomes the recent decreases in energy prices per unit. However, the fact that **standing charges have increased significantly** means many are facing increasing affordability challenges, despite reductions in energy consumption. Even those who are self-rationing energy and, in some cases, living in colder and damper homes which have significant impacts on health and mental health, are seeing rising charges. These high costs persist throughout the year, as they must be paid for gas heating – for example – even when the heating isn't used throughout the spring and summer months. As customers facing high standing charges are unable to save money over the warmer periods of the year, this impacts upon their ability to pay for heating costs over the winter months.

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<sup>14</sup> [Energy Efficiency - Scottish House Condition Survey 2021: Key Findings \(www.gov.scot\)](https://www.gov.scot/resources/consultations/energy-efficiency-scottish-house-condition-survey-2021-key-findings)

<sup>15</sup> [Household Energy Debt - Hansard - UK Parliament](#)

<sup>16</sup> [Changeworks \(2023\). A Perfect Storm: Fuel Poverty in Rural Scotland.](#)

- **High standing charges impact upon those who are least able to pay disproportionately** as customers that have accrued energy debt over previous months or years are often put on pre-payment meters by their suppliers. However, rising standing charges mean that customers attempting to manage high levels of debt have the least control over the bills and pay disproportionately high bills going forward. This restricts peoples' ability to pay off their debt and can trap them into a debt cycle. This has significant impacts on the wellbeing of customers and reduces the likeliness that debts will ever be paid back, resulting in losses for suppliers.

### **Refunding support payments**

- Many people who do not need the Winter Fuel Payment have expressed an interest in returning this. However, there is a lack of transparency in how to go about this and what is done with the money. If the process was clear and a social tariff was applied (so customers could be assured that the refund would better enable other customers to afford their energy bills) this may be a more commonplace practice. Other schemes do not have refund processes, such as the Energy Bill Support Scheme. This should be reviewed if this type of one-size fits all support scheme is to be continued or replicated.

# Addressing the Affordability and Debt Challenge

## 6. What represents best practice in debt management by suppliers?

### Greater flexibility and early action

- In Changeworks' experience, **customers can best be positioned to avoid getting into debt if suppliers are more flexible in payment approaches** – especially where payment is made via direct debit. Often, customers let their supplier know that they are unable to pay a full bill that month and instead offer a lower amount on the basis that they can pay the additional cost the following month. Where this is allowed, oftentimes this avoids the need for a customer to build up energy debt. However, suppliers that do not exhibit best practice in debt management approaches will often inform the customer that flexible payment is not possible and cancel the direct debit payment immediately, automatically placing the customer in energy debt, which often snowballs during times of hardship.
- Whilst there are a myriad of reasons why a customer has fallen into debt, Changeworks has experienced an increase over the last few years of energy debt building up for customers that have a positive history of paying their bills on time, and found themselves forced into debt during times of hardship, such as temporary unemployment, which they have been unable to pay off in the mandated way.
- If suppliers offered a suitable option for spreading the costs over a time period that best works with each customer's unique circumstances, debt could be avoided with early intervention. If a customer were permitted to pay something rather than nothing, accumulated debts would be more likely to be manageable and paid off.
- **Once a household is in energy debt, suppliers often will not separate energy debt from ongoing energy bills.** This is also poor debt management practice, as customers are more likely to engage meaningfully in a repayment plan if they are able to contribute to how it is devised and the timeline over which it is paid back. Automatically adding the debt to the direct debit is more likely to result in hundreds or thousands of pounds worth of debt building up.
- **Currently, levels of flexibility of payment options and amounts for repaying debt vary by meter type.** Using fuel direct or paying through a prepayment meter are traditionally more affordable than paying through a credit meter or monthly direct debits. Debt repayment options should – at a minimum – be equal across all payment options.
- Changeworks has seen that **flexible repayment options have reduced**, and that suppliers are responding to increased levels of debt by restricting repayment methods and plans. This is counterproductive. Customers are best positioned to repay debts if plans suit their needs, such as paying weekly fortnightly as soon as benefit payments are received. Customers relying on benefits or that have insecure income experience a cashflow problem when forced to pay via direct. Preventing the debt cycle through flexibility would be in the best interest of both the customer and the supplier. This would also reduce the risk that the sector becomes less competitive (and affordable for customers) due to profitability concerns amongst investors.

## Non-standardised approaches and support for vulnerable customers

- **Restricting payment methods – such as moving away from physical pay as you go cards – is a barrier to payment** for customers who rely on routine and wish to continue paying their supplier through a method that is familiar to them. For many vulnerable customers, this reduced flexibility from suppliers in recent years is in itself an unnecessary barrier to payment.
- **Enhanced training and support is needed when it comes to vulnerable customers.** Changeworks has experienced a number of instances where customers have found themselves facing unmanageable debt levels due to a lack of support. Changeworks supports vulnerable customers in navigating their energy debt. Often, the supplier requires a meter reading to calculate this, which the customer needs assistance to obtain. Due to delays on the supplier's side, it can often take months for this support to materialise and a meter reading to be taken. By this point, the debt has 'built up' and the repayments are unmanageable. If the customer were permitted to pay what they can afford to during this process, the chances they will be able to repay energy debts once these are established would be higher, benefitting both the customer and the supplier.
- In many cases, suppliers continue to send threatening letters and other forms of communication to customers, even when a debt repayment plan has been negotiated and the customer is complying with the terms agreed, or where a customer is paying as much as they can. This results in intimidation and the customer is less likely to communicate with the supplier at all. When customers feel humiliated and desperate, there is an increased risk that they will stop payments altogether. **A non-standardised approach to escalation** for vulnerable customers that are in energy debt would reduce the chances that customers will avoid all communication with the supplier due to being frightened and panicked.
- While Ofgem has produced guidance and placed obligations on energy suppliers in regard to the protection of vulnerable groups and associated strategies, Changeworks has not seen this change in practice. In Changeworks' experience of supporting customers in reaching out to their energy supplier, customers are often met with accusatory tones and patronising statements, which discourages further cooperation. If suppliers improved their treatment of customers – especially vulnerable groups – build up of debt could often be avoided.
- As mentioned previously in our response to Question 2, automatic identification of customers with vulnerabilities could both enable automatic access to a social tariff to ensure that energy costs are affordable, and identify which customers require a non-standardised approaches to facilitate repayment when energy debt builds up.

## Consistent processes for contacting suppliers and applying for funding

- **A lack of consistency in ways in which customers (and third sector energy advisors) can contact suppliers makes it difficult to advise customers** who are willing to engage and want to pay back energy debts of their options. In Changeworks' experience, how easy or difficult it is to reach suppliers varies significantly. If clients' expectations could be set with confidence, customers would be more likely to meaningfully engage in the process of bill payment or debt repayment.

- **Funding application processes vary between suppliers.** A common financial statement<sup>17</sup> could be utilised to simplify processes for customers (and third sector energy advisors and advocates) to encourage engagement through familiarity, ease and saving resources.

### Charitable funds: Greater regulation and transparency

- **Processes for accessing hardship funds** are usually not transparent and difficult to find, even for experienced energy advisors. Regulations should be put in place to ensure such funds – or at least application processes for funding - are genuinely accessible.
- **Greater transparency around how hardship funds, charitable donation options and ‘helping hand’ funds are used** would better facilitate donator trust in supplier processes. It should be made clear when charitable donations are used to assist people in energy debt only upon the condition that a prepayment meter is installed. At present, this conditionality limits options and flexibility for householders.

## 7. What lessons can we learn from other sectors and countries on managing affordability and debt? And how should they be applied to the energy sector?

- There are lessons to be learned from the Australian proposals set out in the call for input document. As we have previously suggested, the **automatic identification of customers that are eligible for support** – ideally via a social tariff rather than reactive payments and subsidies – would be preferable to current supportive mechanisms. Changeworks recommends that the onus should not be placed on customers to identify support available to them, navigate the application process and associated barriers that often leave vulnerable customers behind. This is also more **cost effective** for suppliers as less manual transactional adjustments are required. Where the onus is placed on the householder to apply for support, the (incorrect) charge is made, often the bill is paid, and then further steps are needed to correct payments. There are also **wider social benefits** to an automatic social tariff. Designing a structure that enables householders to succeed in paying their social tariff can a range of positive societal affects, including improved mental health, a sense of pride, and greater societal engagement.
- **Changeworks does not necessarily agree that the local authority getting involved would be beneficial in helping customers to navigate and manage debt.** This may produce further anxiety and avoidant behaviours, especially amongst social housing tenants. However, lessons that can be learned from the Netherlands case study include the introduction of a third party. In the UK, the feeling amongst customers is that if you can’t pay for energy, the supplier gets involved, and this is ‘the end of the line’. **A third-party intermediary could be beneficial in ensuring that customers don’t slip through the cracks**, instead benefitting from debt advice / counselling and engage in a formal debt relief process.

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<sup>17</sup> CFS: The Common Financial Statement ([moneyadvicetrust.org](http://moneyadvicetrust.org))

- **Changeworks recommends that Ofgem learn lessons from the Money and Pensions Service<sup>18</sup>**, which leads on practices for managing affordability and debt in the UK. The service has a wealth of evidence on how to best support people who are managing high levels of debt, as well as how to enable people on low-income to foster good financial management and saving practices. Extensive work conducted by the Money and Pensions Service could assist the debt management sector with the design of energy debt advice services and approaches to debt collection.

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<sup>18</sup> [Money and Pensions Service \(maps.org.uk\)](https://www.moneyandpensions.org.uk/)

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Get in touch with the team to discuss how we can help you.

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