

## **Comments re: ERA Proposals to Prevent the Disconnection of Vulnerable Consumers.**

Age Concern Scotland aims to ensure that all older people have their needs addressed and their voices heard. While we welcome the proposals and accept that a common definition of vulnerability should be applied across the industry, we believe that best practice can only be achieved if *all* pensioners are deemed vulnerable.

It is our view that the application of the two tests - vulnerability and risk is wholly unnecessary. The health and safety of all pensioners is at risk if they cannot keep warm.

We also believe that the system proposed for making judgements is fraught with difficulties.

In particular, using evidence of benefit entitlement, even ...“for guidance purposes only”... and thereafter, making a subjective judgement is not reliable methodology.

The DWP’s own research shows that millions of pounds in benefits are unclaimed every year.

Additionally, older people tend to give assurances that they ‘manage fine’ and that they have ‘no problem’ looking after themselves when for example a claim for Disability Living Allowance or Attendance Allowance is suggested.

Worry and anxiety about losing their independence can make it difficult to admit a need for help.

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For these reasons we are concerned that the proposals can neither bring consistency to the industry, nor protect pensioners. Age Concern Scotland would recommend that the only full proof method of ensuring both, is to exempt all pensioners from disconnection.

The ERA's proposal to make referrals to social services is a positive move in the right direction. The main point we wish to make here is that there is no evidence of formal partnership arrangements. We are unable therefore to fully support this part of the proposal until such evidence is made available.

We would also welcome the development of good working partnerships between the utilities industry and independent, non-profit making money/debt advice agencies. However, we would recommend referral to such agencies before, rather than after installation of pre-payment meters.

We trust you will give serious consideration to our comments and look forward to hearing the outcome of this consultation process.

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