



Response notes: 'Fairer, faster redress in the energy market' (changes to Energy Ombudsman) - Dept for Energy Security and Net Zero

4 December 2025

Age Cymru is the leading national charity working to improve the lives of all older people in Wales. We believe older people should be able to lead healthy and fulfilled lives, have adequate income, access to high quality services and the opportunity to shape their own future. We seek to provide a strong voice for all older people in Wales and to raise awareness of the issues of importance to them.

We are pleased to respond to this consultation on reforming the Energy Ombudsman redress process. At present, [44% of Welsh households](#) in which the Household Reference Person is aged over 75 are living in fuel poverty. Matters are made worse by the fact that Wales contains the oldest (and least thermally efficient) housing stock in the UK, with around [one quarter of homes](#) being built before 1919 and a national average EPC rating of D.

This situation is reflected in Age Cymru's own research: in our [2025 annual survey](#) of people aged 50+ in Wales, 62% of respondents said that they had made changes in the last year to continue to have enough money to live on, with half of those telling us that they had cut down on energy use. Since April, the Age Cymru Information & Advice line has received over 200 calls relating to energy use, with a significant number of these relating to complaints about energy providers.

Services such as the Energy Ombudsman provide a vital support for the large numbers of older people in Wales who are struggling to meet energy costs. With this in mind, Age Cymru supports any measure to improve the redress process at the heart of the Energy Ombudsman, thereby ensuring that older people in Wales are able to live in comfort and energy security.

We are more than happy to discuss any of the points raised below and can be contacted at policy@agecymru.org.uk.

Escalating complaints

1. Which of the options for tackling barriers to accessing the EO's services do you support? Please evaluate the advantages and disadvantages, particularly in relation to consumer benefit. Where possible, provide evidence or examples.

For tackling the barriers of low awareness and inconvenience, Age Cymru supports all three methods suggested in the consultation document (i.e., advanced signposting, auto-onboarding of consumer details and pro-active outreach). We believe that all these methods offer the potential to improve customer awareness of the Energy Ombudsman and its role, as well reducing some of the inconvenience involved in using its services.

However, we are concerned that both advanced signposting and pro-active outreach are methods that have the potential to overlook those who are digitally excluded. Digital exclusion is relatively common among older people in Wales, with the [Older People's Commissioner for Wales](#) reporting that 33% of over-75s do not use the internet at all in their daily lives. This may be due a lack of awareness, long-term health conditions or disabilities, financial difficulties ([Independent Age](#) note that an increasing number of older people are cancelling broadband subscriptions to save money) or simply a lack of interest/desire to use digital technologies. [Age Cymru's 2025 annual survey](#) also showed that some older people were avoiding using digital technology due to a growing fear of online fraud.

We therefore recommend that any attempt to tackle barriers to accessing the EO's services makes adequate provision for people who do not have access to the internet, or who are otherwise unable or unwilling to use it. Options might include contacting individuals via multiple non-digital methods, including letters and telephone calls.

2. What potential unintended consequences do you anticipate from implementing the above options? Please substantiate your response with evidence or examples.

One potential issue that may affect both the advanced signposting and pro-active outreach methods is the possibility of the EO's communications being mistaken for scams. Age Cymru's [most recent annual survey](#) showed that 34% of older people have experienced a scam over the last twelve months (though the true figure is likely to be higher, as most fraud attempts are not reported). A further 12% said that they found scams to be an ongoing challenge in their day-to-day lives. With this in mind, it is not surprising that we have also received anecdotal evidence of people turning away from digital technology due to a growing fear of online scams. Age Cymru staff have also heard from older people who refuse to speak to strangers who have contacted them unexpectedly (including those claiming to represent services), due to the risk that they might be fraudsters.

This poses a risk to those suggested EO reforms that are based on pro-actively contacting individuals. To meet this challenge, we suggest that the EO uses multiple methods of contact, including digital means but also phone calls and letters, thereby building a sense of trust and credibility between the EO and the consumer.

3. Can you identify other ways to overcome barriers to accessing the EO's support not listed above? Please explain the relative merits of these options.

No comment.

4. Are there any other barriers to consumers accessing the EO that we should seek to remove? How should those barriers be removed?

Aside from the issue of digital exclusion, there are no other obvious barriers to access the EO that fall within the remit of Age Cymru.

5. Do you agree with shortening the waiting time before a consumer can refer their complaint to the EO to 4 weeks with exceptions? Please describe any advantages and/or disadvantages for consumers and suggest alternative approaches you think may be more effective providing evidence or examples. Evidence about the proportion of complaints resolved after 4 and 6 weeks may be of particular use.

We agree in principle with reducing the time that customers must wait for a referral to the EO, as well as the time that the EO takes to decide on each case. We believe that a reduction in these times would mean faster redress (and thus customer satisfaction), as well as reducing the likelihood of customer fatigue and subsequent disengagement with the complaints process.

However, any reduction in referral and resolution times must not result in a poorer quality of service. In particular, we urge the EO to ensure that non-digital means of communication are maintained, even if the service itself is sped up.

6. What are some examples of valid exceptions to these shortened timescales? Please explain how any proposed exceptions would avoid disadvantaging consumers. Where possible, please provide evidence to support your answer.

No comment.

7. Do you agree that the EO should reduce their target to reach a decision to 4 weeks? What are the advantages and/or disadvantages for consumers.

Yes (see above).

8. Are there any other interventions we should consider to secure faster redress for consumers through the EO process?

No comment.

Remedies

9. What are the existing barriers to the implementation of EO decisions? From a consumer perspective, which barriers cause the greatest detriment? Where possible, please provide evidence to support your answer.

No comment.

10. Do you agree that the EO should be able to levy penalties against suppliers for late or incomplete implementation of their decisions? Please describe any advantages and/or disadvantages for consumers.

Age Cymru would support the levying of penalties against suppliers for late or incomplete implementation of EO decisions, if there is evidence to show that this would encourage suppliers to respond more quickly and effectively to consumer complaints.

11. What considerations should be included when setting any penalty regime? For example, how should the level of penalties be set, what exceptions should be included. Where possible, please provide evidence to support your answer.

No comment.

12. Are there any other interventions we should consider to ensure that EO decisions are implemented on time and in full?

As above, we advise that any interventions are communicated to the consumer via both digital and non-digital means, to ensure that the individual is fully aware of any planned redress regardless of their ability to use digital technology.

Organisational Factors

13. How can we improve cooperation between different organisations in the consumer support journey?

No comment.

14. Would any of the changes proposed in this consultation negatively impact other organisations in the consumer support landscape? Please refer to specific proposals in your response.

No comment.

15. Do you agree that the EO should be designated directly through statute as a redress scheme? Please describe any risks or unintended consequences you foresee from appointment in this manner.

No comment.

16. Do you agree that the weight of EO decisions should be increased so that suppliers have an explicit legal obligation to implement EO rulings? Please describe any advantages and/or disadvantages for consumers.

As with our response to Question 10, we would support an increase in the weight of EO decisions if it could be evidenced that this would result in faster and more effective redress for consumer issues.

17. What are the best mechanisms to continue to improve the performance of the EO in delivering easier and faster redress for consumers?

No comment.

18. Does Ofgem remain the appropriate organisation to review the performance of the EO? Please describe the advantages and/or disadvantages of Ofgem retaining this role. What criteria should be applied in evaluating the EO's performance?

No comment.

Heat networks

19. Do you agree with our proposal that proposed reforms to the EO should also be applied to heat network markets? Please provide evidence to support your answer.

No comment.

