

SIAA Response

Fuel Poverty Strategy Consultation

30th January 2018

1) Do you have any comments on this new definition of fuel poverty, in particular, what do you think about the proposal to use AHC and MIS as means to measure fuel poverty in Scotland?

a) What, if any, challenges do you think this approach could present in enabling targeting of resources to those most vulnerable to fuel poverty; and

It is more equitable to use the after housing cost (AHC) measurement as part of the constituted definition of fuel poverty. Similarly, we welcome the use of Scotland's Minimum Income Standard (MIS) as a benchmark by which to define fuel poverty. Such a measure ensures that high income households are not defined as fuel poor, when they have substantially higher incomes than those households whose income is under the threshold which is considered to allow for an adequate standard of living.

There is currently no definition provided of 'extreme fuel poverty' which is an issue that needs to be addressed.

The Scottish Government should also consider how challenging it will be for those individuals and households in fuel poverty to get guidance on how to switch their tariffs, particularly if they are not digitally literate. Moreover, as under the new definition, those in fuel poverty will be living on incomes that are below Scotland's MIS, the Scottish Government must consider more broadly how to improve the standard of living and economic wellbeing of people living within these communities. By adopting this new definition, more weight is by extension put on reducing health inequalities amongst poorer households in Scotland.

b) If this definition is to be used, how would you propose these challenges are overcome?

More targeted research should be carried out into people in the private rented sector who are living in fuel poverty.

2) Do you have any views on the proposal of using 75 years of age as a threshold for identifying those who are likely to be vulnerable to the adverse health outcomes of fuel poverty?

Age does not appear to be useful as an exclusive barometer for identifying those who are likely to be vulnerable to the adverse health outcomes of fuel poverty. In terms of reducing health inequalities and promoting early intervention, we believe that increasing the age limit to 75 could be severely problematic. We believe that it would be more appropriate to change the limit to pensionable age in line with lifestyle changes, taking into account individual circumstances.

3) In relation to island communities, are there any additional

a. challenges ; and / or

b. opportunities

that we need to consider in developing our strategy?

The Scottish Government should make it very clear about how funding will be allocated to ensure energy efficiency measures are subsidised within households across island communities.

The Scottish Government should ensure that Local Authorities, energy providers and landlords in the social and privately rented sectors give adequate information to tenants about how they can best conserve energy and heating in their homes. All efficiency recommendations, from groups such as the Home Energy Efficiency Programmes for Scotland, should be developed specifically for island communities, so that funding disparities between rural and urban households are addressed, but also that strategies for the installation of energy efficiency measures are devised in a bespoke capacity for island communities.

**4) In relation to rural and remote rural communities, are there any additional
a. challenges ; and / or
b. opportunities
that we need to consider in developing our strategy?**

It is essential that the Scottish Government gives careful consideration to the needs of rural and remote rural communities as the environment and subsequent challenges will be completely different to that of an urban setting. For example, there is a need to be realistic about the role that technology could play in rural areas as there is a constant challenge between the promotion of energy efficiency and the preservation of conservation areas.

5) Please give us your views on how national partners and local delivery organisations can work better together to identify and support those at risk of, or experiencing fuel poverty? What would best support, or enable such partnerships?

The strategy needs to implement a collective responsibility to identify and support people at risk of, or experiencing fuel poverty. Local authorities, community planning partnerships, health and support services all require sufficient and sustainable resources and funding in order to best identify and support people. There also needs to be clarity from the Scottish Government regarding individual and collective roles and responsibilities.

6) What can local partners do to contribute to meeting national aims of effectively and sustainably tackling fuel poverty? This might include sharing best practice or developing strategic approaches.

A suggestion contributed at a consultation event was that it would be better and much more efficient to have key indicators for each objective rather than outcomes focused...

7) How can SG support local delivery partners (e.g. third sector organisations and social enterprises) to measure their success?

The Scottish Government should consider how it can work with Third Sector organisations and local community groups, to ensure that they support individuals to develop their digital skills. This is particularly important to ensure that poorer households are able to save money on their energy bills by switching tariff or supplier, and these savings are often most easily found through internet browsing. People who lack digital skills will be denied access to ways of finding out about cheaper tariffs and advice; therefore it is imperative that the Scottish Government considers how access to information, and price transparency across energy providers, may play a crucial role in reducing fuel poverty.

**8) How can the Scottish Government best support local or community level organisations to accurately
a. measure;
b. report on; and
c. ensure quality of provision of advice and support services and their outcomes?**

Community level organisations – particularly those organisations which are working with the most marginalised groups in society – should be supported in working with partners in the health and social care sector, and energy scheme providers. Local and community organisations are more likely to gain knowledge of the extent

of poverty amongst individual households, and can work with health and social care partners, who may then be able to refer them to particular energy scheme providers. For those households which are more likely to be digitally excluded, it is vital that local organisations within communities are able to bridge the gap between households in fuel poverty, and cheaper-tariff energy providers.

It is essential that clarity is provided around a framework for measuring impact, and also what kind of framework will be established for monitoring and evaluation.

The Scottish Government needs to provide long term, sustainable, adequate funding for independent advocacy and advice and support organisations.

9) How can the one-stop-shop approach be enhanced for the benefit of HES clients; and in particular, a. Are there any improvements that you think can be made to the HES service to further enable it to best reach the most vulnerable to fuel poverty client groups?

While the one-stop-shop is a good initiative, it is currently only accessible online or through telephone. With this in mind, it is essential that adequate information, training and support is delivered to voluntary sector organisations and other access points to ensure that those hard to reach groups are not further marginalised.

10) What are your views on our proposal to set a new statutory target to eradicate fuel poverty in the Warm Homes Bill?

While we welcome the proposal to set a statutory target, we believe it is vital that the terminology is correct. We find the definition of 'eradicate' to be misleading and feedback from the consultation event was that it would be more appropriate to use 'reduce'. With that in mind, it is essential that the statutory target is clear, achievable and accessible – a suggestion at the event was to change the statutory target to 'the reduction of fuel poverty to 10%'.

Regardless, it is crucial that the Scottish Government involves a variety of stakeholders, including academics and voluntary sector organisations in the setting of this target, to ensure that the new definition of fuel poverty – as highlighted at the start of the consultation paper - is not watered down.

**11) What are your views on the proposed sub-targets?
a) What are your views on the proposed levels?**

b) What are your views on the proposed timeframe?

It is essential that the strategy clearly outlines short, mid-term and long term objectives and we believe it is vital to stress the importance of SMART actions in tackling fuel poverty in Scotland. All actors – governments, international agencies, civil society organisations, businesses and actors in other sectors should specify in a SMART manner how commitments in their own sectors can help reduce fuel poverty and resulting inequalities.

**12) What are your views on the proposed interim milestones?
a) What are your views on the proposed levels?**

It is important that targeted work addresses how rural and island households are able to reach a parity of minimum energy efficiency with households across the whole of Scotland. These regional disparities will demand greater resources allocated towards rural and island households, and the Scottish Government should ensure that households and businesses are subsidised and informed adequately enough to make their homes more energy efficient.

b) What are your views on the proposed timeframe?

13) How should the new Fuel Poverty Advisory Panel and Fuel Poverty Partnership Forum monitor progress towards meeting the proposed subtargets and interim milestones?

Unsure

14) What do you think the Advisory Panel's priorities should be in its first year?

Unsure

15) What examples do you have of using proxies to identify fuel poor households?

a) Which proxies did you use?

b) Based on your experience, how well did these proxies work in accurately identifying fuel poor households?

Not applicable

16) What are the key lessons to be learnt from any existing approaches that apply proxies in door-to-door, on-the-ground assessments in this context?

Door-to-door, on-the-ground assessments, are likely to allow local authorities, voluntary sector organisations, and the Scottish Government to come to a better understanding about the extent of fuel poverty within a community as they are generally more accessible and thorough than an online or telephone tool.

17) Do you have any concerns about the use of a doorstep tool, in particular the challenges around delivery of area based schemes?

We believe it is really important that doorstep tools are not the responsibility of profit making organisations and that in depth training is given to those individuals conducting the tool. It is really important that recipients know their rights, the doorstep tool is carried out causing minimal disruption to the household and does not infringe upon privacy.

18) How can the Scottish Government most effectively work with Community Planning Partnerships in a collaborative manner to report on overall fuel poverty levels as part of the SHCS?

Unsure

19) What are your views on, or experience of how an outcomes-focused approach would work in practice?

a) Would it encourage national and local policy and delivery partners to work together effectively, and if not, what alternative approach(es) do you propose could be used instead?

As aforementioned, it has been suggested that it would be more achievable for all partners to deliver the strategy objectives if it was developed with key indicators as opposed to being outcomes focused.

20) Do you think the principles detailed in the 3 bullet points above are adequately reflected in the outcomes framework?

We believe that the strategy needs to have a stronger focus on targeting inequalities as fuel poverty is only one aspect of a systemic issue.

21) In your opinion, would the proposed framework help to strengthen partnerships on-the-ground?

a) If so, how?

b) If not, why?

The proposed framework needs to have much clearer objectives and provide clarification on individual roles and responsibilities, funding, monitoring and evaluation and community participation.

22) Do you think any of the proposals set out in this consultation will have an impact, positive or negative, on equalities as set out above? If so, what impact do you think that will be and, if negative, how do you think these could be mitigated?

As the Scottish Government has outlined that the needs of individuals and families are at the heart of service design, a human rights based approach needs to be applied to the strategy. In order for the strategy to be cross government, cross-policy with social justice, fairer Scotland and equalities principles underpinning it, it is essential that is strongly linked to other human rights focused strategies such as Child Poverty, Social Security and the upcoming Healthier Futures Strategy.

There is currently no impact assessment relating to pregnant women and fuel poverty. This is an issue that needs to be urgently addressed due to potential health issues and the need for early intervention in tackling inequality – children born into poverty are more likely to continue in poverty and experience additional inequalities.

23) What implications (including potential costs) will there be for business and public sector delivery organisations from these proposals?

There will be a huge impact on participating organisations in terms of workforce, training, time commitments and funding. It is essential that the Scottish Government adequately provides for all of these factors.

24) Do you think any of these proposals will have an impact, positive or negative, on children's rights? If so, what impact do you think that will be and, if negative, how do you think these could be mitigated?

There is currently no impact assessment on how the strategy will affect children and young people. In terms of early intervention and tackling inequalities, it is vital that this is an issue that is addressed through partnerships with children's rights organisations.

We believe that it is essential that the Scottish Government considers and implements the principles of the United Nations Convention on the Rights of the Child (UNCRC) into the final strategy.

The Scottish Independent Advocacy Alliance (SIAA) is Scotland's national membership body for advocacy organisations. The SIAA promotes, supports and defends independent advocacy in Scotland. It aims to ensure that independent advocacy is available to any person who needs it in Scotland.

SIAA is a Scottish Charitable Incorporated Organisation Charity number SC033576

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