



Response to the Scottish Government Fuel Poverty consultation 1 February 2018

Introduction

As the representative body for Scotland's Local Authority Chief Housing Officers ALACHO welcomes the opportunity to respond to the Scottish Government's proposals for reducing and eventually eliminating fuel poverty.

Scotland's councils have a significant interest in this issue arising from:

- our role as strategic housing authorities with an interest in the functioning of the local housing market, housing conditions and their impact on housing needs and demands;
- our role in the regulation of the private rented sector and in supporting landlords and tenants to improve the quality of services and standards;
- Local Government's wider role in reducing fuel poverty and reducing greenhouse gas emissions; and
- The range of specific proposals set out in the consultation document that will impact directly on councils and the work they do to improve the lives and opportunities of local residents.

The consultation document addresses issues of both a strategic/long term nature and some more detailed operational issues. Individual local authorities and organisations directly involved in service delivery will be better placed to respond to the more detailed questions, in preparing this response we have tried to focus on the higher-level issues.

Our Response

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?

ALACHO supports the overall approach behind the revised definition. We agree that the proposed changes will improve both our understanding of the number and distribution of households in fuel poverty and will assist in targeting action and measuring progress. In particular we support the use of "After Housing Cost" income and the Minimum Income Standard (MIS).

However, we do not agree with the decision not to follow the full recommendations of the expert panel that developed the definition. In particular we think that the definition should follow the panel's recommendation that MIS thresholds should be adjusted upward for households living in remote rural areas and that the enhanced heating regime should be applied to households with children under five.

In making this comment we note the Scottish Government's argument that to include such adjustments would be inconsistent with approaches taken elsewhere in relation to the definition of poverty and NHS guidance. This approach is particularly disappointing when the Scottish Government acknowledges in the consultation document that:

"..... fuel poverty is distinctly different from other forms of poverty in its drivers and we want to ensure that the most appropriate measurement indicators are used to identify those experiencing it"

Our view is that the definition proposed by the expert panel should be adopted in full.

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

We accept that using a more complicated definition of fuel poverty will make the task of gathering evidence and targeting fuel poor households more difficult. However, many of the measures that have been used to address fuel poverty, particularly those aimed at improving energy efficiency or providing advice require over precise targeting and to focus too closely on such an approach is likely to result in vulnerable households being missed.

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

Overall, our view is that by working together with organisations and agencies that are regularly in contact with those at risk of fuel poverty should provide the level of information about individual households at risk that will allow the level of targeting required.

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?

We agree that 75 is a better age based proxy for those older people whose health is likely to be at greater risk from fuel poverty.

But we also agree with the expert panels recommendation that:

"that a small independent group of Scottish public health experts be invited to develop a specific list of health and disability categories, as well as age bands, which would satisfactorily encompass the term "vulnerable to the adverse health and wellbeing impacts of living in fuel poverty"."

Having a more comprehensive framework for identifying vulnerable households will also help engage health and allied professionals in the process of identifying those most at risk.

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?

Other organisations and in particular rural and island Councils will be better placed to respond to these questions than we are. In this context we are aware of some specific concerns expressed by Borders Council.

We would however, note that an effective focus on fuel poverty in remote and island communities would also support the broader ambitions that the Scottish Government has for growing the population in these areas.

The report by the Rural Fuel Poverty Task Force has provided both an analysis of fuel poverty in rural and island communities. The Scottish Government should use this report and its recommendations as the basis for working with Councils, the third sector and communities in these areas to ensure that programmes and policy responses are properly tailored to local circumstances. We would also argue that the “leaving the hardest to last” approach that has been adopted across a number of programmes in the past should be avoided. Such approaches always disadvantage those living in rural areas.

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?

Our response to Q. 3 applies here also.

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?

Partnership working should be built from the ground up and reflect local circumstances, capacities and priorities. For this reason, we do not think it would be helpful for us to try to set out some sort of prescription for how it should be organised.

That said we do believe that the following will be essential for partnership to be effective:

- Leadership at national and local level;
- clarity of purpose and roles;
- the ability to develop and adjust responses to local circumstances;
- respect for the independence of the organisations involved; and
- taking a co-production approach to problem solving and programme design.

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.

We have already observed that prescriptions for local working are likely to be unhelpful but we do agree that the effective sharing of best practice and what works (and does not work) will be important throughout the process of eliminating fuel poverty.

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

Our overall view is that this is a discussion that should be had with partner organisations but we also believe that the following will help:

- desired outcomes and mile stones should be locally flexible and clear;
- where funding is provided it should be linked to the outcomes desired and, where possible provided on a multiyear basis sufficient to deliver those outcomes;
- the views and preferences of those in fuel poverty should have a significant place in overall programme delivery and evaluation

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?**

Other organisations will be better placed to respond to this question but we would observe that the Scottish Government needs to be clear about its expectation and realistic about what can be achieved within the resources available.

Developing a common reporting framework may be of assistance and there may be some value in reviewing The Scottish National Standards for Information and Advice Providers (SNSIAP) to ensure that they are fit for purpose of providing advice on fuel poverty and related issues.

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?**

Individual councils and local partners will be better able to respond to this question than us.

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

ALACHO is a firm supporter of a long-term strategy for the eradication of fuel poverty. Setting a clear target for this was one of the key strengths of the approach taken previously even though the 2016 target was missed.

We accept that setting a target for reducing rather than eliminating the problem is likely to be seen as more realistic. It is not, however, particularly ambitious. Our view is that the target should be the elimination of fuel poverty based on the revised definition by 2040.

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

a) What are your views on the proposed levels?

The overall fuel poverty rate will be less than 10% by 2040:

See our response to Q. 10.

Ensure the median household fuel poverty gap is no more than £250 (in 2015 prices before adding inflation) by 2040:

We agree with the proposals set out in the consultation document on this issue though we would argue that reducing the fuel poverty gap should be set out as milestones on the path to elimination.

Remove energy efficiency as a driver for fuel poverty by ensuring all homes reach a minimum energy performance rating by 2040:

We strongly support this approach but would point out that for it to be achieved the Scottish Government will need to set very challenging targets for the improvement of energy efficiency in the owner occupied and private rented sectors.

b) What are your views on the proposed timeframe?

Our view is that a tighter time frame and faster progress would be better but we acknowledge the complexity of the issue, the difficulties in delivery, the financial challenges and the range of priorities competing for resources.

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

a) What are your views on the proposed levels?

See our response to question 11(b)

b) What are your views on the proposed timeframe?

As above.

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

Both the panel and the forum should be given the opportunity to develop the monitoring and performance reporting in discussion with stakeholders. In that context some further details of how both are to be appointed would be helpful.

More generally though we are of the view that progress should be reported directly to parliament at least annually, that it should be broken down both by at risk groups and geography including rural and island communities.

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

There are likely to be a number of practical steps required including agreeing the monitoring and reporting framework, clarifying details of the definition and supporting the development of partnership working and addressing governance issues and membership. However, these should not be allowed to distract from a

clear focus on putting programmes in place that reduce fuel poverty. Both the panel and the forum should have clear focus action.

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

Others will be better placed to respond to this question

a) Which proxies did you use?

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

Others will be better placed to respond to this question

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?

Others will be better placed to respond to this question

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

Others will be better placed to respond to this question.

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?

In general terms this is a question that is best directed at the Community Partnerships themselves. However, we are of the view that some work will be require to ensure that fuel poverty is properly prioritised by partnerships and effectively linked to other service delivery activity. This will be particularly important in identifying those at risk of fuel poverty.

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

As in other areas a focus on properly defined outcomes will be important to the success of the work to eradicate fuel poverty. But defining outcomes and in particular ensuring that those outcomes are properly based on the experience and aspirations of those experiencing or at risk of fuel poverty will be one of the key early tasks.

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?

In our view it would, provided that the outcomes are understood and supported by the organisations and agencies involved as well as the general public.

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

We support the principle as set out in the consultation document

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

a) If so, how?

b) If not, why?

We don't feel able to express a full view on this but our wider experience is that whilst frameworks can help partnership working culture, commitment and common purpose will be more important.

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?

We have been unable to come to a clear view on this but believe that equalities information should be gathered as core element in the monitoring process and that organisations representing equalities groups should play a role in design, delivery and evaluation of the programme.

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

The implication that will be of most concern will be in relation to costs. We would urge the Scottish Government to work with councils and others to establish a realistic estimate of costs particularly were they those costs are likely to impact directly on lower income households (for example Council and RSL tenants) as the basis for an honest an open conversation about what can realistically be achieved within the resources available as well as the impact on other programmes.

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?

Reducing the number of children living in cold homes can only have a positive impact on the health and welfare of those affected but we are not in a position to provide a full answer to this question.

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