



Consultation on a Fuel Poverty Strategy for Scotland: Analysis of responses to the public consultation exercise



PEOPLE, COMMUNITIES AND PLACES

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Craigforth

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Executive Summary

This summary presents headline findings from the analysis of responses to the Scottish Government's consultation on a Fuel Poverty Strategy for Scotland. The consultation closed on 1 February 2018 and 91 responses were received with 80 groups or organisations and 11 individual members of the public responding.

Review of the Fuel Poverty Definition (Questions 1-2)

The Scottish Government proposes that the Warm Homes Bill will include a new definition of fuel poverty including an income threshold based on 90% of the UK Minimum Income Standard (MIS) (after subtracting housing, fuel and childcare costs) and that the 10% fuel cost to income ratio will be based on an After Housing Cost (AHC) basis. Question 1 sought respondent's views on the proposed new definition of fuel poverty.

The new definition of fuel poverty was broadly welcomed by many respondents, while others expressed support for the attempt to improve the definition of fuel poverty. Positive points raised regarding the new definition were most frequently that it will: better target support to the most in need; prevent relatively wealthy households with high energy costs from being considered to be in fuel poverty; and improve understanding of the number and distribution of households in fuel poverty.

However, many responses were caveated, particularly expressing concern that the Scottish Government does not propose to follow the Definition Review Panel's recommendations to adjust the UK MIS threshold upward for households living in remote rural areas. There were concerns that the proposed definition is more complex than the previous version and that this may make identifying or assessing fuel poor households more of a challenge.

There was broad support for use of AHC income including as a more accurate measure of the income available to spend on fuel. However, respondents often requested greater clarity on which housing costs are included or excluded.

Adoption of the MIS was also supported in principle by many respondents.

Remote rural or island communities: A large number of respondents expressed concerns that the Scottish Government does not propose to follow the Definition Review Panel's recommendations to adjust the UK MIS threshold upward for households living in remote rural areas. Several respondents provided examples to illustrate a concern that the proposed definition will seriously under-represent the extent of fuel poverty in remote rural or island areas and lead to resources or investment being diverted away from the areas where fuel poverty is highest.

Households where at least one member of the household is long-term sick or disabled: Respondents who commented on this issue all suggested that MIS thresholds should be adjusted where at least one member of the household is long-term sick or disabled.

Question 2 asked for views on the proposal to use 75 years of age as a threshold for identifying those who are likely to be vulnerable to the adverse health outcomes of fuel poverty.

Opinions were often nuanced, with some respondents both seeing merit in the proposals and expressing reservations. Overall, the majority of respondents tended to express concerns. The most frequently raised issues included that, as advised by the Definition Review Panel, there should be further work ‘to develop a specific list of health and disability categories, as well as age bands, to satisfactorily encompass the term “vulnerable to the adverse health and wellbeing impacts of living in fuel poverty”’. It was observed that life expectancy is below 75 in many of Scotland’s most disadvantaged communities, that the reasons for choice of 75 are not clear, and that State Pension Age might be a more appropriate threshold.

It was also suggested that the proposed change could have a disproportionate effect in rural and island areas where a higher proportion of the population is elderly and so would be more likely to be excluded on grounds of age alone.

Recognising the distinctiveness of all our communities (Question 3-4)

Question 3 and 4 asked if respondents have identified additional challenges or opportunities in relation to island communities or remote rural communities.

In broader comments, it was suggested that the Scottish Government should recognise and respond to established higher living costs in these areas and follow the Definition Review Panel’s recommendation to upgrade the UK MIS threshold.

Respondents identified a range of challenges associated with island communities which they thought the Scottish Government should consider when developing the Strategy. It was noted that the remoteness of island communities can lead to high costs, including in relation to travel and transport. Also associated with remoteness were lack of mains gas and hence higher energy prices. The weather and climate, older population profile, low incomes, age and condition of much of the housing stock, and shortage of accredited installers for energy efficiency measures, were also highlighted.

In terms of opportunities, general comments included that there should be flexibility for communities to develop solutions, with Local Authorities and third sector partners often suggested to be best placed to tailor resources to local circumstances.

Specific opportunities identified included the development of renewable energy generation projects and resolving grid constraints to provide additional carrying capacity for energy from renewable sources. It was also suggested that new local electricity supply and storage projects, and the potential of district heating schemes, should be explored. Finally, there were suggestions around developing local supply chains and addressing skills shortages and creating employment by investing in apprenticeships or training.

Respondents tended to refer back to their comments on islands in response to the question on rural and remote rural communities or suggested that the issues on islands and remote rural areas are essentially the same. Of those who commented at this question, points specific to challenges and opportunities for rural and remote rural communities on the mainland raised were that the concept of ‘island proofing’ should also be applied to remote and rural areas.

Partnership working (Questions 5-9)

At Question 5, on how national partners and local delivery organisations can work better together to identify and support those at risk of, or experiencing fuel poverty, a number of respondents emphasised the value of close partnership working between services and agencies – national and local. Many saw an opportunity to learn from existing partnership working and cited a range of existing approaches and guidance as offering potential to inform further development of partnership working. In terms of specific services, respondents most frequently referred to the importance of better partnership working between housing, health and social care services.

At Question 6, in terms of what local partners can do to contribute to meeting national aims of effectively and sustainably tackling fuel poverty, respondents emphasised the value of better partnership working to maximise the impact of local partners’ activity. Ensuring there is a shared commitment across partners, and that fuel poverty has a clear place alongside partners’ competing priorities, were also seen as important.

Question 7 asked how the Scottish Government can support local delivery partners to measure their success. A number of respondents wished to see the Scottish Government produce a reporting framework linked to the outcomes expected from partners, including guidance on methodology and indicators for local partners to use in measuring their impact. It was also suggested that a standardised measurement/reporting tool, and potentially a centralised reporting ‘hub’, could further improve this reporting.

Question 8 asked how the Scottish Government can best support local or community level organisations to accurately measure, report on and ensure quality of provision of advice and support services and their outcomes. Respondents tended to focus on developing a monitoring and evaluation framework with associated indicators and guidance for organisations to use in measuring their impacts.

Question 9 considered how the one-stop-shop approach could be enhanced for the benefit of HES clients. Suggestions included closer working with local partners and community-level organisations, and more use of outreach approaches and face-to-face engagement.

Targets and indicators (Questions 10-12)

Question 10 asked for views on the proposal to set a new statutory target to eradicate fuel poverty in the Warm Homes Bill. Respondents often made a general

statement welcoming the proposal or supporting a statutory target in principle. Such a target was suggested to be important or essential, to demonstrate Government commitment, or to provide a means to monitor progress.

A number of respondents made points concerning use of the word 'eradicate' and some felt that this is not right word if the target is actually to reduce fuel poverty to below 10%. Others argued that the Scottish Government *should* be aiming to completely eradicate fuel poverty, in other words to reduce levels to zero, or should set a date by which this will occur. Some respondents suggested that the existing targets should be more ambitious.

The importance of adequate resources being made available was also highlighted, and respondents noted that the consultation paper contains little information on how the proposed targets will actually be delivered.

Question 11 asked about the proposed sub-targets. The three sub-targets are: the overall fuel poverty rate will be less than 10% by 2040; ensure the median household fuel poverty gap is no more than £250 (in 2015 prices before adding inflation) by 2040; and remove energy efficiency as a driver for fuel poverty by ensuring all homes reach a minimum energy performance rating by 2040.

Respondents sometimes made a statement welcoming or supporting the inclusion of sub-targets, or noting that they approved in principle. Although some respondents suggested the sub-targets to be ambitious but achievable, others felt they are not ambitious enough or that they lack urgency.

With respect to timeframes, while some gave their support, others thought that the proposed timeframe is too long.

A number of respondents commented on Sub-target 3: Remove energy efficiency as a driver for fuel poverty by ensuring all homes reach a minimum energy performance rating by 2040. Although many respondents welcomed this sub-target, some thought it should be achieved sooner than 2040. A number of respondents noted that the minimum acceptable energy efficiency standard has yet to be defined and that this detail is needed.

Question 12 asked for views on the proposed interim milestones. Although a small number of respondents who, in principle, had opposed the inclusion of the sub-targets also argued against the inclusion of interim milestones, a much more frequent position was that they are supported. Reservations expressed about the milestones were most likely to be that the levels and timeframes proposed are not, or may not be, sufficiently challenging or that they represent only very modest reductions on present levels of fuel poverty.

Comments specifically on milestone 1 were typically that it is not ambitious enough, with respondents noting that the figures set out in the consultation paper suggest that only a small percentage of households would be removed from fuel poverty by 2030. On milestone 3, it was felt that detail is lacking.

Monitoring, evaluation and reporting (Questions 13-18)

Question 13 asked how the new Fuel Poverty Advisory Panel and Fuel Poverty Partnership Forum should monitor progress towards meeting the proposed sub-targets and interim milestones.

A number of respondents commented on the importance of establishing an approach to monitoring from the outset. This was often associated with the approach being clearly set out in the Fuel Poverty Strategy. Respondents also commented on the importance of taking a partnership approach to tackling fuel poverty and felt that this should be reflected in the membership of the new Advisory Panel and Partnership Forum. Suggestions included having members who represent the rural and island perspective, or who have direct experience of working in the field of fuel poverty, or who have lived experience of fuel poverty.

It was suggested that the proposal for 4 yearly reporting does not seem sufficient. Annual, outcome-focused reporting was proposed as better way forward¹. It was also suggested that reporting should cover progress made in meeting targets and milestones that relate specifically to rural and remote rural Scotland.

On the new Advisory Panel's priorities in its first year (Question 14), a number of respondents felt that establishing an outcomes-focused monitoring and evaluation framework and scrutiny programme was a priority.

Respondents also identified a priority around reviewing the definition for fuel poverty to ensure that it covers vulnerable people, fuel poor people and does not discriminate based on geography². A specific suggestion was that the new Advisory Panel could assess the extent to which Scottish Housing Condition Survey (SHCS) data accurately reflects rural fuel poverty or fuel poverty at a small area level³.

Another priority identified was around partnership working and included that the new Advisory Panel should focus on the development of partnerships⁴.

At Question 15, in terms of examples respondents had of using proxies to identify fuel poor households, the most frequently used proxies were Council Tax Records (used by 18 respondents), the Scottish Index of Multiple Deprivation (SIMD) (used by 16 respondents) and being in receipt of social welfare benefits, including

¹ The Home Energy Efficiency Programmes (HEEPS) programme will continue to publish annual programme reports on delivery of measures by the programme, and Scotland's Energy Efficiency Programme (SEEP) will consider wider reporting requirements going forward. The new Scottish Fuel Poverty Advisory Panel will also provide an annual update to Ministers on the progress of that group.

² The Scottish Government's proposed definition of fuel poverty, has been informed by recommendations of an independent panel of experts. The Definition Review Panel's report, 'A New Definition of Fuel Poverty in Scotland - A review of recent evidence', is available online at <http://www.gov.scot/Resource/0052/00527017.pdf>.

³ The SHCS is designed to produce nationally representative estimates of key statistics annually, and local authority representative estimates by combining data over a three-year period.

⁴ The remit of the new Scottish Fuel Poverty Advisory Panel requires the group to encourage and foster a partnership approach to tackling fuel poverty across the public, private and third sectors.

Housing Benefit (used by seven respondents). Less frequently used proxies included EST Home Analytics and Energy Performance Certificate (EPC) rating.

Question 16 asked about key lessons to be learned from any existing approaches that apply proxies in door-to-door, on-the-ground assessments. Comments included that the door-to-door approach is an effective, if resource intensive, way of gathering accurate information.

Some respondents highlighted the challenges associated with using the door-to-door approach, including that householders, and particularly older people, can be suspicious of those coming to their door and may in any case be reluctant to share detailed income and fuel use information⁵.

At Question 17 a number of respondents made broader comments about the use of doorstep tools for area-based schemes. There was support for the development of a tool which allows for easy identification of fuel poor households. However, others had significant reservations. Concerns included that it would or may not be well received by householders and by vulnerable householders in particular.

Other concerns or comments focused on the level of resources that would be required to use any doorstep tool.

Moving forward, some respondents commented on possible issues around any new tool including that it is difficult to comment on its value without knowing how it will be constructed and what it will be used for. It was suggested that it will need to be straightforward and user friendly. It was also suggested that users would require significant training and guidance

At Question 18, in terms of how the Scottish Government can most effectively work with Community Planning Partnerships in a collaborative manner to report on overall fuel poverty levels as part of the SHCS, comments included that it will be important to utilise local data.

Outcomes and principles

Question 19 asked for views on how an outcomes-focused approach would work in practice. Many respondents began their comments with a statement of support for taking an outcomes-focused approach. Strengths and positive impacts anticipated as stemming from such an approach in the field of fuel poverty included that it would shift the focus away from properties, numbers of energy efficiency measures installed, or funding invested, and onto the impact on people, and specifically on to people who need support the most.

Other comments included that gathering qualitative feedback on the impact that fuel poverty or energy efficiency measures have had on individual households may be a challenge.

⁵ The assessment tool would be used by frontline workers to assess whether someone is in fuel poverty. It is not designed to be used as part of any cold calling-based approach.

A number of respondents simply agreed that the outcomes-focused approach would encourage national and local policy and delivery partners to work together effectively. Further comments included that it will support a collective vision that all partners can share. It was also suggested that it will help foster more closely aligned and successful partnership activity, and will encourage national and local policy and delivery partners to work together effectively.

The consultation paper sets out that the following principles will underpin the approach to tackling fuel poverty:

- The fuel poverty strategy will be firmly based on the principle of social justice and creating a fairer and more equal society, irrespective of whether individuals live in urban or rural Scotland;
- The Scottish Government's approach to fuel poverty eradication will be set on a statutory framework, measured and overseen by Ministers and delivered via partnership structures at a local level. Building on the assets of individuals and communities will be at the heart of this partnership and early intervention and prevention will be crucial to success; and
- The needs of individuals and families will be at the heart of service design and delivery and the fuel poverty strategy will address all four drivers of fuel poverty: income, energy costs, energy performance, and how energy is used in the home.

At Question 20 on the three principles, many respondents agreed that the principles are adequately reflected in the outcomes framework. Other comments tended to focus on areas which were not seen as being given sufficient coverage within the three principles. It was suggested that the needs of rural and island communities are not clearly acknowledged and taken into account.

The final question in this section, Question 21, asked respondents if they thought the proposed framework would help to strengthen partnerships on the ground. A majority of respondents, 72% of those answering the question, thought it would.

Those who thought the proposed framework would help to strengthen partnerships on the ground most frequently pointed to the importance of working collaboratively to tackle fuel poverty. Respondents also pointed to the importance of fuel poverty being established as a clear priority for the partnerships and the organisations they work with, and to all those involved in understanding how they and others can contribute towards achieving shared outcomes. Otherwise, respondents noted some of the conditions they believed would need to be in place for the collaborative approach to work successfully, including the availability of sufficient funding.

Assessing impact

Question 22 asked respondents if they thought the proposals will have an impact, positive or negative, on equalities and in particular on those with protected characteristics (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation).

Of the respondents who answered the question, 59% thought there would be a positive impact for people with protected characteristics, while 32% thought impacts would be negative and 10% did not foresee there being any impact.

Respondents who took a generally positive view of the impacts of the proposals suggested benefits would include reducing inequality, targeting those most in need and making fuel poverty a priority, although some concerns about the outcomes in rural and island areas and the effect of raising the age threshold were also expressed.

Respondents taking a generally negative view often referred to their fundamental concerns that the proposed definition of fuel poverty does not properly recognise the issues faced by rural and island communities.

At Question 23, on the implications (including potential costs) for business and public sector delivery organisations from these proposals, a number of respondents commented that they are as yet unclear what the implications might be.

There was reference to increased burdens in terms of reporting and monitoring. The potential for increased costs to both businesses and delivery organisations, particularly when working in remote rural and island communities, was also noted. Local authority respondents in particular were amongst those who pointed to the demand on existing resources and to the need for additional funding. Opportunities for business development and job creation were identified as potential benefits stemming from the proposals.

The final consultation question, Question 24, asked respondents if they thought any of the proposals will have an impact, positive or negative, on children's rights. Of those who answered the question, 65% thought there would be a positive impact for children's rights, while 19% thought impacts would be negative and 16% did not foresee any impacts. Comments included, most frequently, that any initiative to reduce inequalities or target fuel poverty in households with children is welcome. Benefits identified for children included improved living conditions, better health and wellbeing, and improved educational achievement. Negative impacts arising from the new definition of fuel poverty were suggested as including that resources may be diverted away from households with children.

1. Introduction

- 1.1. This report presents analysis of responses to the Scottish Government's consultation on a Fuel Poverty Strategy for Scotland.
- 1.2. The consultation opened on 9 November 2017 and closed on 1 February 2018. The consultation paper is available at <https://consult.gov.scot/better-homes-division/fuel-poverty/> and all published responses can be viewed at https://consult.gov.scot/better-homes-division/fuel-poverty/consultation/published_select_respondent.

Profile of respondents

- 1.3. In total, 91 responses were available for analysis, of which 80 were from groups or organisations and 11 from members of the public.⁶ The majority of responses were received through the Scottish Government's Citizen Space consultation hub. Others were received via email or in hard copy.
- 1.4. Respondents were asked to identify whether they were responding as an individual or on behalf of a group or organisation. Organisational respondents were then allocated to one of ten categories by the analysis team. A breakdown of the number of responses received by respondent type is set out in Table 1 below and a full list of organisational respondents can be found in Annex 1.

Table 1: Respondents by type

Type of respondent	Number
Organisations:	
<i>Community or Tenant Group or Federation</i>	4
<i>Energy Company</i>	6
<i>Health and Social Care</i>	5
<i>Housing Association</i>	8
<i>Housing Body or Group</i>	3
<i>Inter-agency Group or Partnership</i>	5
<i>Local Authority</i>	21
<i>Other</i>	7
<i>Research Group</i>	2
<i>Third Sector</i>	19
Organisations	80
Individuals	11
All respondents	91

⁶ One individual submitted two responses. The content of these two responses has been combined for the analysis presented within this report.

- 1.5. As with any public consultation exercise, it should be noted that those responding generally have a particular interest in the subject area. However, the views they express cannot necessarily be seen as representative of wider public opinion.

Analysis and reporting

- 1.6. A number of respondents did not complete the formal consultation response questionnaire, instead opting to submit their comments in a statement-style format. This content was analysed qualitatively under the most directly relevant consultation question.
- 1.7. Where a closed question was asked, the results have been presented. A count of the number of comments made by respondent type is also presented at each question. If a respondent referred to their comments elsewhere within their response this has been counted as a comment. If a respondent said they had no view or did not feel able to make a comment this has not been included.
- 1.8. The remainder of this report presents a question-by-question analysis of the comments made. The main focus of the analysis is on addressing the specific questions posed. However, a number of respondents raised broader issues within their comments, sometimes focusing on the theme covered within a section rather than on the questions themselves. Summary analysis of these comments is also presented.
- 1.9. In line with the qualitative nature of most of the questions asked, the analysis reflects the diversity of issues raised by respondents. However, when a significant proportion of those answering the question (1 in 10 respondents or more) raised the same point an indication of scale has been given. In these instances, it should be noted that this does not imply anything regarding the views of other respondents who answered the question and their comments have also been reflected in the broader analysis.

2. Review of the Fuel Poverty Definition

Summary of Questions 1 and 2

- The new definition of fuel poverty, or efforts to improve the definition of fuel poverty, were broadly welcomed, particularly as a means of targeting those in most need of support.
- Some felt that the new definition is more complex and that this may make identifying fuel poor households more challenging.
- There was broad support for the use of After Housing Cost (AHC) income and the Minimum Income Standard (MIS).
- A number of respondents were concerned that the Scottish Government does not propose to adjust the UK MIS threshold upward for households living in remote rural areas.
- It was suggested that that MIS thresholds should be adjusted where at least one member of the household is long-term sick or disabled.
- There was support for further work being done to develop a specific list of health and disability categories, as well as age bands, to satisfactorily encompass the term 'vulnerable to the adverse health and wellbeing impacts of living in fuel poverty'.
- There were queries as to why the age threshold has been set at 75 years, and suggestions that State Pension Age might be a more appropriate threshold.

- 2.1. The Scottish Government appointed an independent panel of experts to review the definition of fuel poverty to ensure it is fit for purpose. The Definition Review Panel made clear both that continuing to use the existing 10% definition would be unsatisfactory and that the definition should not be based on household income before housing costs. The revised definition it proposed was that households in Scotland are in fuel poverty if: they need to spend more than 10% of their after housing cost (AHC) income on heating and electricity in order to attain a healthy indoor environment that is commensurate with their vulnerability status; and if these housing and fuel costs were deducted, they would have less than 90% of Scotland's Minimum Income Standard (MIS) as their residual income from which to pay for all the other core necessities commensurate with a decent standard of living.⁷
- 2.2. The Scottish Government proposes that the Warm Homes Bill will include a new definition of fuel poverty including an income threshold based on 90% of the UK MIS (after subtracting housing, fuel and childcare costs) and that the 10% fuel cost to income ratio will be based on an AHC basis. The Scottish Government does not, however, intend to take forward some of the detail of

⁷ The Definition Review Panel's report, 'A New Definition of Fuel Poverty in Scotland - A review of recent evidence', is available online at <http://www.gov.scot/Resource/0052/00527017.pdf>.

the measurement of the definition proposed by the Definition Review Panel: the MIS thresholds will not be adjusted upward for households living in remote rural areas or where at least one member of the household is long-term sick or disabled.

2.3. Question 1 sought respondent's views on the proposed new definition of fuel poverty.

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

2.4. A total of 88 respondents commented at Question 1a and 85 respondents commented at Question 1b. A breakdown of the number of comments received by respondent type is set out in Table 2 below.

Table 2: Number of comments by respondent type

Type of respondent	Number of comments at 1a	Number of comments at 1b
Organisations:		
<i>Community or Tenant Group or Federation</i>	4	4
<i>Energy Company</i>	6	6
<i>Health and Social Care</i>	5	5
<i>Housing Association</i>	8	8
<i>Housing Body or Group</i>	3	2
<i>Inter-agency Group or Partnership</i>	5	5
<i>Local Authority</i>	21	20
<i>Other</i>	7	7
<i>Research Group</i>	2	2
<i>Third Sector</i>	18	17
Organisations	79	76
Individuals	9	9
All respondents	88	85

2.5. Some responses to the first part of Question 1 were extensive, incorporating detailed arguments and worked financial examples to illustrate points made. Although these can only be summarised very briefly in a report of this kind, all

consultation responses are available in their entirety to the Scottish Government.

General comments

- 2.6. The new definition of fuel poverty was broadly welcomed by many respondents, (around 1 in 5 of those answering the question) while an approximately equal number of others (also around 1 in 5 of those answering the question), expressed support for the attempt to improve the definition of fuel poverty, or agreed that the current definition is no longer fit for purpose. However, many responses were caveated, particularly expressing concern that the Scottish Government does not propose to follow the Definition Review Panel's recommendations to adjust the UK MIS threshold upward for households living in remote rural areas.
- 2.7. Positive points on the new definition included that it will:
- Better target support to the most in need, placing greater emphasis on households with low incomes than under the current definition. This was suggested by around 1 in 5 of those answering the question.
 - Prevent relatively wealthy households with high energy costs from being considered to be in fuel poverty. This was suggested by around 1 in 10 of those answering the question.
 - Improve understanding of the number and distribution of households in fuel poverty and will assist in targeting action and measuring progress. Specifically, it was suggested the new definition may better identify those in private rented accommodation, younger people and those with families who may not currently be captured by the old definition. More Black and Minority Ethnic (BME) households were also suggested likely to come under the new definition.
- 2.8. Less welcome aspects of the proposed definition identified by respondents were primarily that:
- It is more complex and less easy to understand than the previous version. This point was made by around 3 in 10 of those answering the question.
 - This complexity may make identifying or assessing fuel poor households more of a challenge for staff, could act as a barrier to engaging households needing support, or could lead to inaccurate reporting due to different interpretations of the data. This range of issues was highlighted by around 1 in 6 of those answering the question.
- 2.9. The need for a definition that can be communicated easily was suggested to be important, that any formula used should be transparent and widely disseminated, and that a consistent approach to assessment is needed. An online template, calculator or app was thought necessary, along with appropriate staff training. A checklist advising customers of the information it would be useful to have available at an appointment with an advisor was suggested.

- 2.10. It was also noted that the consultation paper does not provide detail on the mechanisms by which the proposed new statutory target will be delivered, other than to refer to Scotland's Energy Efficiency Programme (SEEP) as the main relevant programme. Clarity on what the definition is to be used for was requested, including whether it will be used to assess eligibility for support, or to monitor the scale of fuel poverty. It was suggested that, given its complexity, the new definition may be more useful as a statistical tool, and that simplified criteria may be more useful for targeted funding. The potential importance of proxies going forward was also noted.
- 2.11. Respondents sometimes noted and agreed with the Definition Review Panel's recommendation that further work be undertaken 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"'. In this context it was suggested that:
- Implementation should be postponed for two to three years to allow the development and inclusion of a robust Scottish definition of vulnerability in the new definition of fuel poverty.
 - The Scottish Government's determination that such work should not delay implementation of a revised definition could mean the targeting of those 'most in need' may be missed, or that some degree of subjectivity in the assessment will be required until the work is completed.
- 2.12. A small number of respondents suggested that, without simplification or clarification of the definition or adjustment in the proposed methodology with respect to the rural MIS, they would prefer to see the existing definition of fuel poverty retained. It was also suggested that, for a number of years, new and old definitions should be used in parallel to help assess the new Fuel Poverty Strategy's progress.
- 2.13. Other concerns raised by small numbers of respondents included:
- The definition does not mention 'extreme fuel poverty' and this should be addressed.
 - The definition could exclude some households with low income and high fuel bills. It was suggested that only those with high housing costs combined with their fuel costs are likely to pass the income test, potentially excluding groups of people on low incomes, and that this could include households with low rents, and pensioners who have paid off their mortgage.
 - Under the new definition, borderline households may move in and out of fuel poverty as a result of variation in income or fuel prices, and so may not receive the help they need.
 - Clarity is needed as to how local fuel prices will be used in the calculation, particularly given their fluctuation and diversity in island settings.

- There could be problems for area-based schemes which have traditionally made use of proxies. It was suggested that households that are not eligible for assistance might decline to participate in energy efficiency improvement schemes and that this could stop common improvements being carried out.
- Use of actual data with respect to the energy performance of a property would be preferable to use of modelled data. Using real data was suggested to be cost-effective as well as more accurate, robust and defensible.
- Disappointment that a more sophisticated hybrid 'Boardman'⁸ / MIS approach' is not being adopted was also expressed.

Childcare costs

2.14. The relatively small number of respondents who commented specifically, agreed that childcare costs should be subtracted prior to residual income being determined, and it was noted that such costs are substantial for many households. It was also suggested, however, that it can be difficult to establish childcare costs in some circumstances, such as in non-nuclear families or where child maintenance payments are involved.

2.15. A further suggestion was that other care costs represent a significant element of the cost of living for many older and disabled people and that these should also be included.

After Housing Cost

2.16. Around 2 in 5 of those answering the question made a statement of broad support for use of AHC, including as a more accurate measure of the income available to spend on fuel. However, respondents often requested greater clarity on which housing costs are included or excluded. This issue was raised by around 1 in 6 of those answering the question, with further comments including that:

- The change to AHC is only positive if real housing costs are included. Property repair and maintenance costs were highlighted most frequently, and it was also suggested that fewer owners of older homes, which may not be energy efficient, will in future be considered to be in fuel poverty and eligible for assistance.
- All elements to be included or excluded from AHC should be specified and explained.

⁸ The Boardman definition agrees that fuel poverty should be considered a unique form of poverty, distinct from other types of poverty, and requiring tailored solutions. It specifies a range of parameters that must be objectively measured and monitored - always in the same way over time - to yield a consistent estimate of fuel poverty prevalence and its broad demography.

2.17. It was also suggested that there could be inequity within and between housing tenures, and that research to determine what can reasonably be considered as 'housing costs' might be commissioned.

Minimum Income Standard

2.18. Around 3 in 10 of those answering the question made a statement in support of the principle of adopting the MIS, including because it is based on what the public think people need for an acceptable minimum standard of living and so is based on lived experience and actual costs that households face. It was also suggested, however, that some explanatory work may be needed since the concept will be relatively new to many people and could be seen as more subjective than a simple link to income.

2.19. General points on the MIS, each made by only a small number of respondents, included that:

- Clarification is needed as to whether the definition is based on Scottish or UK MIS, as the consultation refers to Scotland's MIS in the text, but to UK MIS in the footnotes.
- The rationale for using 90% of MIS rather than the full figure should be given.⁹
- It was also considered important that the MIS calculation be transparent and consistent in order to gain support and confidence that the outcomes are reasonable. Success was suggested to depend on the accuracy with which the MIS is stated and updated.
- Indication of what constitutes being fuel poor for a family of over 6 people should be provided.

Remote rural or island communities

2.20. Around 1 in 3 respondents of those answering the question expressed concerns that the Scottish Government does not propose to follow the Definition Review Panel's recommendations to adjust the UK MIS threshold upward for households living in remote rural areas. It was suggested that the Scottish Government is seeking to adopt a 'one-size-fits-all' solution, and that the proposed approach will obscure or confuse the extent of fuel poverty in rural areas.

2.21. Respondents quoted the Scottish Rural Fuel Poverty Taskforce, the Scottish Fuel Poverty Strategic Working Group, the Joseph Rowntree Foundation, and the findings of the 2016 report on 'A Minimum Income Standard for Remote Rural Scotland'¹⁰ as illustrating the higher living costs in rural areas. Points made included that:

⁹ The 90% figure was recommended by the Definition Review Panel and the rationale for the figure selected is discussed in their report.

¹⁰ Available at: <http://www.hie.co.uk/regional-information/economic-reports-and-research/archive/a-minimum-income-standard-for-remote-rural-scotland.html>

- Living costs in rural areas are such that 10-40% higher incomes are required to achieve the UK average MIS level.
- The new definition would see fuel poverty rates in rural areas fall from 34.9% to 20.3% - below the urban rural poverty rate and below the national average.

2.22. Around 1 in 10 of those answering the question provided examples to illustrate a concern that the proposed definition will seriously under-represent the extent of fuel poverty in remote rural or island areas and lead to resources or investment being diverted away from the areas where fuel poverty is highest.

2.23. The explanation given in the consultation paper that a rural adjustment would be 'inconsistent with the broader approach taken by Scottish Government in measuring income poverty' was questioned, and suggested to be failing to:

- Reflect the Government's agreement with the Definition Review Panel 'that fuel poverty is distinctly different from other forms of poverty'.
- Meet the Government's commitment that 'the Fuel Poverty Strategy will be firmly based on the principle of social justice and creating a fairer and more equal society, irrespective of whether individuals live in urban or rural Scotland.'

2.24. It was also noted that, while adjustments for those living in remote, rural or island communities are not normally made when measuring income poverty, such adjustments are not unheard of across the public-sector landscape in Scotland.

2.25. Other points related to fuel poverty in rural areas included reference to the absence of mains gas. It was suggested that off-gas areas can be used as a proxy for higher fuel bills and hence for fuel poverty and that a weighting should be applied to reflect being off-gas grid.

2.26. A further suggestion was that, if the new definition is used, one possible approach to tackling rural fuel poverty would be for Government to fund advice and advocacy agencies to measure actual energy use rather than proxies for fuel poverty, and then to provide funding to address fuel poverty on the basis of these measured costs.

2.27. Finally, with specific reference to fuel poverty in the islands, it was argued that the proposed definition must be 'island-proofed' as per the commitment in the draft Islands (Scotland) Bill, and that a full impact assessment should be carried out, before implementation.

Households where at least one member of the household is long-term sick or disabled

2.28. Respondents who commented on this issue all suggested that MIS thresholds should be adjusted where at least one member of the household

is long-term sick or disabled. This issue was raised by around 1 in 10 of those answering the question. Further arguments included that:

- The proposal could have adverse effects on vulnerable people and may be discriminatory.
- These households may have lower income generating potential, higher additional costs, and spend more time at home.¹¹
- The reason given in the consultation paper is not adequate unless negative consequences from the policy inconsistencies mentioned can be demonstrated, or that the consultation paper is itself inconsistent in the arguments made.

Heating regime for vulnerable households

2.29. Several respondents welcomed the Scottish Government's intention to accept the Definition Review Panel's recommendation on heating regimes for vulnerable households by increasing the bedroom temperature from 18°C to 20°C and maintaining the living room temperature of 23°C. It was noted that this is more generous than the previous definition and means more people may be defined as fuel poor. It was also suggested, however, that 23° is very warm and that 21°C would both be comfortable for most people and in line with efforts to reduce fuel consumption.

Households with children under 5

2.30. Respondents who commented specifically on the decision not to apply the enhanced heating regime for vulnerable households to households with children under 5:

- Argued that enhanced heating regime should be applied to such households including because they may spend more time at home.
- Supported the Scottish Government's proposal for a further review of evidence or suggested that the definition can only be finalised when the review is complete.

Challenges in enabling targeting of resources

2.31. Respondents who commented specifically on challenges in enabling targeting of resources most frequently identified gathering the necessary data as a significant issue. This issue was raised by around 1 in 10 of those answering the question with further points including:

- Detail is required to clarify how sufficient and reliable data could be gathered on individual households to determine whether they are in fuel poverty, to an extent that would allow effective targeting of resources.

¹¹ Such households have a 'vulnerable heating regime' applied which is higher than the standard, reflecting the longer time spent at home. This higher regime results in higher modeled fuel costs. The SHS collects data on income directly from households and therefore should capture lower income levels for such households where they exist.

- Those involved in the Scottish House Condition Survey (SHCS) will need to produce robust and consistent data that can be used on the doorstep by others who are not connected with the survey, for example contractors checking eligibility for schemes such as Home Energy Efficiency Programmes (HEEPS).
- Obtaining information from households that have not sought assistance may be difficult and resource intensive.
- Identifying lower income households with high housing costs, but who may not be in receipt of benefits will be a challenge, and that housing benefit or universal credit data will be useful in this respect. Proxies such as benefit levels and Energy Performance Certificate (EPC) rating were suggested in the absence of detailed data.
- More thought and analysis may be needed on the benefits of a more accurate definition versus the complexity of measurement using it.

Proposals for overcoming challenges in targeting resources

2.32. Answers to the second part of Question 1 tended to reflect the emphasis of the respondent's earlier comments and the most frequently made points at Question 1b were that the Scottish Government should accept the advice of the Definition Review Panel and adjust the MIS upward for remote rural areas and/or for disabled people. These issues were raised by around 1 in 6 of those answering the question. Other comments on the definition per se, where already covered above, are not duplicated here.

2.33. General suggestions on overcoming challenges included:

- There may be value in targeting different types of support in different ways – for example, by providing immediate financial support to those on the lowest incomes.
- The Scottish Government should work with industry to consider how the new definition will affect the supply chain.
- There could be a small-scale pilot for any new data set.

Data quality

2.34. Suggestions included that fuel poverty data should be produced by the Scottish Government and disseminated to local authorities or that work between Government and local authorities will be central to ensuring that data collection is fit for purpose. Other respondents highlighted the importance of impartiality, suggesting that there needs to be an appropriate audit process, independent of reporting organisations, or that data collection should be separate from the Energy Saving Trust (EST) and Home Energy Scotland (HES).

2.35. The SHCS team collecting data from households was suggested to have a vital role in making data management robust, and that the new requirements will add extra complexity. It was also suggested that both quantitative and

qualitative data relating to people with protected characteristics identified under the Equality Act 2010 should be collected.

Collecting data

Clear process

2.36. The need for clear assessment guidelines and straightforward parameters that are easy to interpret for/with customers was highlighted. Ensuring transparency in the decision-making process was also suggested to be important to minimise disputes, both between partners on eligibility questions, and with households who believe they should qualify for assistance.

Staff training and resources

2.37. Several respondents highlighted the importance of staff being properly trained and resourced and that this should include staff responsible for providing advice or information to those affected by fuel poverty. Development of a 'doorstep tool' or eligibility calculator was suggested to be a priority. An Excel-based poverty calculator used by the Centre for Sustainable Energy was suggested as a possible model.

2.38. While most respondents suggested technological solutions to be important, an element of caution was also expressed concerning reliance on unproven technology.

Raising awareness and referral routes

2.39. The need to raise awareness among the general public was highlighted and it was suggested that very clear reasons for the changes implemented will need to be given. A small number of respondents also pointed to the importance of involving communities and people with lived experience of fuel poverty in the decision-making process.

2.40. Sign posting by healthcare or social care routes, energy advisers, groups mailings, advertisements in appropriate publications, and television campaigns were all suggested as means of targeting those who may be experiencing fuel poverty. For the working population it was suggested targeting should be through the workplace. In general, communication on a face-to-face basis rather than by telephone was suggested to be preferable.

Relationship with individual households

2.41. Since detailed personal information will be required from individual households, a good relationship between household and surveyor was suggested to be important. Other advice included avoiding asking households to fill in forms.

Other sources of information

2.42. The importance of sharing more detailed data on householders was highlighted and development of data linkage to support targeting was suggested as an area with potential. A number of respondents pointed to the

value of information sharing and collaborative approaches between organisations and across Government.

- 2.43. It was also argued that a range of indicators/proxies may still be needed to ensure easy access to support rather than the need to have a full survey undertaken before help can be provided. Suggestions included:
- Being in receipt of certain benefits.
 - Living in a property with a poor EPC rating.
 - Eligibility for Cold Weather Payments.
- 2.44. It was also suggested, however, that someone with low household income but not claiming benefits, not in social housing and not accessing services will be very difficult to identify.
- 2.45. A small number of respondents made points specifically relating to operation of area-based schemes including that indicators could continue to be used for area-based projects, particularly for energy efficiency schemes where the focus is on features of the property rather than the current occupants. It was also suggested that it may be helpful to learn from those places where area-based delivery has been most effective, and target support to help underperforming local authorities.

Further research

- 2.46. A small number of respondents suggested the need for further academic work, including updating the MIS on a regular basis, and measuring and monitoring the outcomes of the new fuel poverty definition and its impact on the effective delivery of the new Strategy. It was also suggested that there should be research relating to people in the private rented sector who are living in fuel poverty.
- 2.47. Question 2 sought respondent's views on the proposal to use 75 years of age as a threshold. The consultation paper explains that the Scottish Government proposes that, for older households, where a person does not suffer from any long-term ill health or disability, they will not be considered vulnerable until they reach 75 years of age.

Question 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?

- 2.48. A total of 87 respondents commented at Question 2. A breakdown of the number of comments received by respondent type is set out in Table 3 below.

Table 3: Number of comments by respondent type

Type of respondent	Number
Organisations:	
<i>Community or Tenant Group or Federation</i>	4
<i>Energy Company</i>	5
<i>Health and Social Care</i>	5
<i>Housing Association</i>	8
<i>Housing Body or Group</i>	3
<i>Inter-agency Group or Partnership</i>	5
<i>Local Authority</i>	21
<i>Other</i>	6
<i>Research Group</i>	2
<i>Third Sector</i>	18
Organisations	77
Individuals	10
All respondents	87

2.49. Opinions at Question 2 were often nuanced, with some respondents both seeing merit in the proposals and expressing reservations. Overall, the majority of respondents tended to express concerns. Respondents sometimes also observed that age, or age alone, is not a good indicator of vulnerability.

2.50. The most frequently raised issues were:

- Support for the Definition Review Panel’s recommendation for further work to develop a specific list of health and disability categories, as well as age bands, to satisfactorily encompass the term “vulnerable to the adverse health and wellbeing impacts of living in fuel poverty”. This issue was raised by around 1 in 5 respondents who answered the question.
- Observation that life expectancy is below 75 in many of Scotland’s most disadvantaged communities. This issue was raised by around 1 in 5 respondents who answered the question.
- Suggestion that 75 is an arbitrary choice or that it is not clear why 75 has been selected. These issues were raised by around 1 in 6 respondents who answered the question.
- Suggestion that State Pension Age might be a more appropriate threshold. This issue was raised by around 1 in 8 respondents who answered the question.

2.51. Points made in support of a change to the current threshold included that taking the age as 60 does not reflect improved life expectancy and that

people should not automatically be considered vulnerable at 60. Respondents also suggested the proposal to be:

- Justified, reasonable, pragmatic or to have merit.
- Evidence-based.
- In line with NHS guidance or the views of many health professionals.
- In line with Warmer Homes Scotland qualifying criteria.

- 2.52. It was also noted that those between 60 - 75 will continue to be included in the definition of vulnerability where they also have a long-term sickness or disability, and that the change will release funding for other fuel-poor households but also that the policy should be reviewed on a regular basis to ensure the age threshold remains appropriate.
- 2.53. Points made against a change to 75 included, as noted above, that this figure seems to be arbitrary, or that it represents a very crude way of defining vulnerability. A small number of respondents argued that vulnerability to fuel poverty would be better framed in terms of a household's ability to deal with and resolve challenges in respect of their energy use, and that this would encourage support for understanding energy bills and making behavioural changes, rather than focusing primarily on improving the fabric of the building. The need to develop support programmes such as 'Energycarer' was also suggested.
- 2.54. Respondents also argued that the choice of 75 is not evidence-based, queried the robustness of the evidence used, or expressed a view that moving to 75 is too big a jump from 60 and may cause some cases of vulnerability to be overlooked. Alternative suggestions included that the threshold should be 65, 67, 70, lower than 75, or that there could be staged approach. It was also argued that the age profile of illnesses exacerbated by fuel poverty should be considered and used to determine the correct age threshold, if this has not already been done.
- 2.55. Most frequently, however, respondents argued that the threshold should be in line with State Pension Age. Arguments in favour of the latter approach included that, irrespective of activity levels, this is likely to be the point at which income is reduced and when people spend more time at home and so need to heat their homes for longer.
- 2.56. References to poorer life expectancy in disadvantaged communities were frequent, with respondents sometimes arguing that the proposed change would discriminate against those most likely to be vulnerable or would stop many being eligible for support. It was argued that ways of taking the poorer health outcomes of such households into account must be found, with one specific suggestion being a weighted approach, reflecting reduced life expectancy in socially deprived areas.

- 2.57. It was also suggested that the proposed change could have a disproportionate effect in rural and island areas where a higher proportion of the population is elderly. Respondents expressing this view sometimes also referenced other issues relating to rural and island communities addressed at Question 1.
- 2.58. The importance of any proposed change in age being accompanied by increased efforts to identify those under 75 who need assistance under other criteria was highlighted. Many respondents called on the Scottish Government to implement the Definition Review Panel's recommendation for further work to develop a specific list of health and disability categories, as well as age bands, to satisfactorily encompass the term "vulnerable to the adverse health and wellbeing impacts of living in fuel poverty.
- 2.59. Work by the Consumer Futures Unit and by the energy sector under Ofgem's Significant Code Review were suggested to be of value in helping to identify and support vulnerable people. Preventative work was also suggested, including supporting people below 75 to take action to improve their homes at an age when they may be more likely to accept help or to be able to invest in improvements. Also highlighted was existing work with GP practices, identifying households where the early onset of long term conditions resulting from cold damp homes are indicated.
- 2.60. Among other health related issues suggested for consideration were that:
- Mental as well as physical health issues should be included.
 - Vulnerability could be difficult to validate for someone awaiting diagnosis – a process that can take long periods.
- 2.61. A small number of respondents highlighted other policy areas or assistance schemes that might be affected by the proposed change including:
- How increasing the age at which people are considered vulnerable may relate to policy looking to support older people to remain in their own homes for longer.
 - How assessments for other assistance such as Cold Weather Payments and Winter Fuel Payments might be affected.
- 2.62. It was also noted that with respect to Personal Independence Payments, those under 60 have a disability definition which includes mobility needs, but mobility disability is not recognised over the age of 60. This means anyone between 60 and 75 would have to have disability care needs to be viewed as vulnerable.
- 2.63. Finally, it was argued that there may be a risk of discrimination if a generic age threshold is used without providing justification. In particular it was suggested that a high proportion of the older BME population will be affected by the change in age, and that this was not addressed in the equality impact assessment.

3. Recognising the distinctiveness of all our communities

Summary of Questions 3 and 4

- Many thought the Scottish Government should recognise and respond to higher living costs in island remote rural communities and follow the recommendation to upgrade the MIS threshold.
- Suggested challenges identified with tackling fuel poverty in island and remote rural communities included weather and climate, the lack of mains gas, the older population profile, lower than average incomes, the age or condition of much of the housing stock and poor local supply chains.
- The commitment in the draft Islands (Scotland) Bill that any new policies should be 'island-proofed' was welcomed.
- Opportunities identified included the sustainable development of natural resources and specifically, renewable energy generation projects.
- It was suggested that the concept of 'island proofing' should also be applied to remote and rural areas.

- 3.1. Section 3 of the consultation paper notes that addressing fuel poverty in Scotland's remote rural and island communities presents a different set of challenges to many other parts of the country, with challenges identified including that homes are more exposed to wind and weather, and more expensive to heat as the majority are not connected to mains gas. Island-specific opportunities identified include a more readily identifiable community, strong local relationships extending to a tradition of self-sufficiency in many places, and a resource-rich, high quality environment that supports good quality of life.
- 3.2. Questions 3 and 4 asked if respondents have identified additional challenges or opportunities - at Question 3 in relation to island communities, and at Question 4 in relation to remote rural communities.

Question 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?

- 3.3. A total of 79 respondents commented at Question 3a and 68 respondents at 3b. A breakdown of the number of comments received by respondent type is set out in Table 4 below.

Table 4: Number of comments by respondent type

Type of respondent	Number of comments at 3a	Number of comments at 3b
Organisations:		
<i>Community or Tenant Group or Federation</i>	4	2
<i>Energy Company</i>	5	4
<i>Health and Social Care</i>	4	3
<i>Housing Association</i>	7	7
<i>Housing Body or Group</i>	3	2
<i>Inter-agency Group or Partnership</i>	5	5
<i>Local Authority</i>	19	17
<i>Other</i>	7	5
<i>Research Group</i>	2	2
<i>Third Sector</i>	14	13
Organisations	70	60
Individuals	9	8
All respondents	79	68

3.4. In general comments, respondents sometimes noted that the challenges faced by island and rural communities, and the high levels of fuel poverty experienced, have been well-documented by the Scottish Rural Fuel Poverty Task Force, but also that recognising challenges is meaningless unless practical action results. It was suggested that the Scottish Government should recognise and respond to established higher living costs in these areas and follow the Definition Review Panel's recommendation to upgrade the MIS threshold. Around 1 in 5 respondents who answered the question made this point.

3.5. As a consequence of the proposed new definition, and the large downward adjustments in the percentage of rural households considered fuel poor that will result, it was suggested that funding for energy efficiency improvements could be directed elsewhere. If higher living costs in rural areas are not included in the definition, it was argued that the problem of rural fuel poverty will be masked, even if HEEPS: Areas-Based Schemes (ABS) and SEEP schemes recognise the higher costs. With respect to ABS, it was also suggested that although small rural towns may benefit, very isolated rural communities do not.

Challenges

3.6. Around 1 in 7 of those who commented identified issues associated with weather and climate as challenges for island communities adding to building maintenance costs and making it more difficult to achieve recommended temperatures.

- 3.7. Challenges resulting from the remote location of island communities included high costs in relation to travel and transport including high petrol cost and delivery surcharges. One respondent suggested petrol costs are a significant factor in fuel poverty and should be included in AHC. Around 1 in 5 of those who answered the question highlighted lack of mains gas and hence higher energy prices, and it was noted that since prices of alternative fuels such as heating oil and electricity are not regulated, their prices are higher and can fluctuate. Dependence on electricity, and a weak distribution network prone to power outages was suggested to put householders with no alternative heat source at higher risk during power cuts, while poor access to broadband was suggested to exclude some communities from digital innovation or to preclude individuals or communities benefiting from the opportunity to switch suppliers and obtain lower tariffs.
- 3.8. Issues associated with population profile included that islands typically have an older population, with lots of people living alone. The high levels of fuel poverty in single pensioner households were noted. Difficulties experienced by young people trying to find their own homes were also noted. Related healthcare issues included both high demand from an older population, and higher costs and poor provision, with a suggestion that it can be difficult both to secure and retain staff.
- 3.9. Around 1 in 10 respondents who answered the question noted that low incomes are common on islands, which may be economically fragile areas, and it was suggested that, even with improved energy efficiency, the combination of low incomes and high energy prices may still leave some households in fuel poverty.
- 3.10. Within communities, challenges identified included difficulties in engagement and encouraging participation in strategy development. Digital communication was suggested to mitigate against involvement by older people. It was also suggested that in small, close knit communities, some may be reluctant to admit to being in fuel poverty, and that within the agricultural and farming communities, individuals may not identify themselves as needing assistance.
- 3.11. It was also argued that other communities, including equalities groups, should be recognised in addition to those defined on a geographical basis.
- 3.12. Problems raised specifically with respect to the cost of electricity included absence of cheap tariffs for single supply (although it was acknowledged this is to be introduced) and lack of choice of utility companies. Higher prices paid for electricity by customers in remote areas were also raised, and that communities in northern Scotland and the islands are paying more for their electricity supply than does the rest the country, even though islands may be net exporters of electricity. A small number of respondents specifically associated these higher costs with the replacement of submarine cables distributing electricity, and it was also suggested that Scotland's National Marine Plan could make replacing these cables more expensive than

previously thought, with the unintended consequence of pushing households further in to fuel poverty.

- 3.13. Issues associated with the age or condition of much of the islands' housing stock were identified as presenting challenges by around 1 in 5 respondents who answered the question, noting a high percentage of poorly insulated, energy-inefficient homes, that are often older detached houses of solid wall construction. Specific problems associated with improvement of older properties, particularly of traditional construction included:
- The high cost of necessary work. This was highlighted by around 1 in 7 respondents who answered the question. It was also noted there are not likely to be opportunities for economies of scale for work in rural or island areas.
 - Restrictions on what is permissible in a conservation area – both in increasing cost and meaning householders may have to accept solutions that they would prefer not to have – such as internal wall insulation.
- 3.14. There was also concern that it may not be possible for many properties to achieve an acceptable EPC rating or that it will not be financially viable to do so in some cases. Reform of the EPC system with respect to the grading of off-gas properties was advocated, since the current methodology reflects the cost of heating a property rather than its energy efficiency.
- 3.15. Around 1 in 6 respondents who answered the question suggested installation of energy efficiency measures was constrained by local poor supply chains or limited by a shortage of accredited installers.
- 3.16. In respect of HEEPS funding, it was suggested that although rural areas have received an uplift in funding, the differences between indicative costs and actual costs may be such that funding provided still does not cover delivery. It was also noted that HEEPS does not cover social housing. Mainland contractors were sometimes suggested to be unwilling to accept work in remote areas or not be trusted by householders who would prefer to use trusted local contractors.
- 3.17. It was also suggested that there may be a shortage of local support, advice and delivery with respect to understanding heating systems, tariffs and energy efficiency measures.
- 3.18. With respect to the challenges identified it was suggested that the Scottish Government should:
- Ensure a full islands impact assessment is undertaken, and that action to mitigate any negative consequences is put in place. The commitment in the draft Islands (Scotland) Bill that any new policies should be 'island-proofed' was noted or welcomed by around 1 in 8 respondents who answered the question. Better use of Cold Weather Payments and the

Winter Fuel Allowance were suggested to have potential to contribute to 'island proofing'.

- Review electricity surcharges in remote areas.
- Use real energy consumption data. Scottish Government estimates of fuel poverty, derived using modelled data and proxies, were argued to be lower than figures obtained using real energy consumption data. Distribution of expenditure for heating in rural and island communities was also argued to be different to that in urban areas. It was suggested that these differences result from highly complex systems of underlying influences.
- Provide additional and longer-term funding. In particular, annual funding programmes were noted to be difficult to tie in with the 5-year strategies typically operated by social landlords.

Opportunities

3.19. In terms of opportunities, general suggestions included:

- The Scottish Government should allow flexibility for communities to develop unique solutions rather than seeking to adopt a 'one-size-fits-all' approach. Local authorities and third sector partners were often suggested to be best placed to tailor resources to local circumstances.
- There should be explicit links between the Fuel Poverty Strategy and the climate change agenda, providing opportunities for joined up working.
- A 'Fuel Poverty Challenge Fund' could be used to boost innovation and community-based partnerships.

Renewable energy generation

3.20. Sustainable development of natural resources and specifically, renewable energy generation projects were suggested to present opportunities, by around 1 in 9 respondents who answered the question, and that developments could be owned and/or operated by local communities. Such community-led projects should, it was argued, be fast-tracked through the development and planning processes. Benefits identified in production of low carbon energy included providing energy security, environmental benefits and job creation.

3.21. There were also calls for the Scottish Government to resolve grid constraints to provide additional carrying capacity for energy from renewable sources. However, given these constraints it was suggested that opportunities to set up new local electricity supply and storage projects should be explored, and that the proposed 'Publicly Owned Energy Company' could boost such projects by offering to purchase power on a long-term basis. Examples of several existing community groups and energy generation projects were highlighted.

- 3.22. The potential of other district heating schemes was highlighted by several respondents although district heating was also suggested to have limited use and relevance to island communities.
- 3.23. Prioritisation of alternative fuel sources such as biomass, and air source heat pumps was suggested. Biomass and anaerobic digestion combined heat and power and district heating systems were suggested to have potential additional benefits including restoration of forests and native woodlands, providing opportunities for recreation and tourism and generating employment.
- 3.24. In terms of funding, an opportunity to prioritise local renewable energy solutions through schemes such as the CARES Loan was suggested.

Installation of energy efficiency measures

- 3.25. With respect to energy efficiency it was suggested that a review or call for evidence on innovative approaches/smart technologies could identify new options.
- 3.26. Other opportunities identified included:
- Developing local supply chains.
 - Addressing skills shortages and creating employment by investing in apprenticeships or training and helping to achieve PAS2030 certification¹² for local contractors. It was also suggested that, since energy efficiency has been designated as an infrastructure priority, skills shortages should be addressed at a national level.
 - Relaxing the requirements of PAS2030 accreditation for simpler projects such as loft or floor insulation, or introduction of other quality management or regulatory systems that may be more practical for small contractors.
 - Allowing flexibility on the spend per property, accepting a trade-off between treating the worst performing properties and treating larger numbers of homes.
 - Installing smart meters as fast and reliable broadband is extended.
 - Reviewing Schemes of Assistance to ensure effective approaches are in place in relation to the private sector. Joint Schemes across the island local authorities could be explored in terms of opportunities for more efficient ways of working and cost savings.
 - Integrating delivery and energy advice services to provide a complete package of high quality support.
 - Replicating the Warmer Homes Scotland model to boost training and employment.

¹² <http://gdorb.decc.gov.uk/installers/become-a-green-deal-installer>

Providing advice and support

- 3.27. Putting greater resource into advocacy and support, including face-to-face advice was suggested to be necessary.
- 3.28. The potential for involving communities in identifying those in fuel poverty and providing advice and support was also suggested and longer-term funding for community groups was proposed. Wider community engagement was suggested as a means of addressing any potential stigma associated with fuel poverty, and of value in facilitating a higher take up of energy efficiency measures. Suggestions included supporting Community Councils in such activities.
- 3.29. It was also suggested that there should be support for community buying groups, to give more householders the opportunity to obtain lower prices for unregulated fuels.

Other opportunities identified

- 3.30. Among other opportunities, suggested by only one respondent, was installing infrastructure for electric vehicle charging.

Question 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?

- 3.31. A total of 83 respondents commented at Question 4a and 64 respondents at b. A breakdown of the number of comments received by respondent type is set out in Table 5 below.

Table 5: Number of comments by respondent type

Type of respondent	Number of comments at 4a	Number of comments at 4b
Organisations:		
<i>Community or Tenant Group or Federation</i>	4	1
<i>Energy Company</i>	5	4
<i>Health and Social Care</i>	3	2
<i>Housing Association</i>	7	5
<i>Housing Body or Group</i>	3	1
<i>Inter-agency Group or Partnership</i>	5	4
<i>Local Authority</i>	20	18
<i>Other</i>	7	5
<i>Research Group</i>	2	2
<i>Third Sector</i>	17	15
Organisations	73	57
Individuals	10	7
All respondents	83	64

3.32. There was significant overlap in responses at Questions 3 and 4, and some respondents provided a combined answer while others commented ‘see Question 3’ as their response at Question 4, or indicated a view that issues concerning islands and remote rural areas are essentially the same. Amongst respondents who chose to respond only at Question 4, or who answered both questions, frequently raised issues were very much in line with those identified at Question 3, namely:

- Higher heating costs as a result of being off-gas grid.
- Higher improvement costs associated the nature, age or condition of much of the housing stock.
- Poor delivery chains and shortages of accredited contractors.
- Desirability of longer term funding arrangements including for organisations working to alleviate fuel poverty and particularly for community groups.

3.33. A small number of other points made at Question 4, have been included in the analysis at Question 3 to avoid duplication.

3.34. Points specific to challenges and opportunities for rural and remote rural communities on the mainland were that:

- The concept of ‘island proofing’ should also be applied to remote and rural areas or that there should be a rural infrastructure plan.

- Remote peninsulas are sometimes more isolated than islands and that although they do not have issues relating to ferry transport, remote areas also have additional transport costs. Isolated communities exist not only in the Highlands but also on the peripheries of the Central Belt and across the South of Scotland.
- The definition of a 'rural settlement' used for the purposes of the Energy Company Obligation (ECO) scheme can act against direction of funds to the most rural areas. Since a rural settlement is considered to be one of up to 10,000 households, it was suggested to be cheaper and easier for companies to deliver measures in larger communities which may be on-gas grid. It was argued that delivery organisations should collect data to allow tracking of measures delivered to off-gas grid households.
- Expanding the gas network should be considered. It was suggested extending the gas network to new communities could bring significant financial benefits to customers as well as benefitting the environment. Potential expansion of the network to Fort William was noted.
- Involvement of communities in decision making should take particular note of the views of people living in rural areas where the majority of the population in the same local authority area lives in urban areas.

3.35. Finally, the potential of a SEEP phase 2 pathfinder project in the Borders testing a 'whole area' approach to improving energy efficiency was noted. This involved different house types with different geographies as well as intensive local advice and awareness raising - with advice officers on the ground and a drop-in hub.

4. Partnership working

Summary of Questions 5 to 9

- The value of close partnership working between national and local services and agencies was emphasised. The importance of better partnership working between housing, health and social care services was highlighted.
- Respondents saw a role for more effective sharing of good practice, including suggesting that the Scottish Government should do more to support this.
- The potential for local partners to develop more strategic approaches to tackling fuel poverty was highlighted.
- Respondents wished to see the Scottish Government produce a reporting framework linked to the outcomes expected from partners.
- In terms of support for local or community-level organisations to measure and report on their outcomes, respondents tended to focus on the Scottish Government developing a monitoring and evaluation framework.
- On enhancing the one-stop-shop approach, suggestions included closer working with local partners and community-level organisations as a means of extending the range and quality of services available.

- 4.1. Section 4 of the consultation paper highlighted the range of national and local partners who will be involved in delivering the Fuel Poverty Strategy. It noted that a comprehensive delivery plan will be required and that the Plan should set out a clear and common aim to eradicate fuel poverty that all partners – across local and national government, business and industry, and the third sector – can sign up to working towards.

Question 5 – [a] 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? [b] What would best support, or enable such partnerships?

- 4.2. A total of 79 respondents commented at Question 5a and 65 respondents at 5b. A breakdown of the number of comments received by respondent type is set out in Table 6 below.

Table 6: Number of comments by respondent type

Type of respondent	Number of comments at 5a	Number of comments at 5b
Organisations:		
<i>Community or Tenant Group or Federation</i>	4	4
<i>Energy Company</i>	3	2
<i>Health and Social Care</i>	4	3
<i>Housing Association</i>	8	6
<i>Housing Body or Group</i>	3	1
<i>Inter-agency Group or Partnership</i>	5	4
<i>Local Authority</i>	20	15
<i>Other</i>	6	4
<i>Research Group</i>	1	1
<i>Third Sector</i>	17	16
Organisations	71	56
Individuals	8	9
All respondents	79	65

Partnership working

4.3. Around 1 in 7 of those respondents who answered the question emphasised the value of close partnership working between services and agencies, both national and local, while around 1 in 9 suggested that effective partnership working is already taking place between national and local agencies across Scotland. Around 1 in 8 of those answering the question saw an opportunity to learn from existing partnership working or cited a range of existing approaches and guidance (most commonly guidance from ScotPHN and NHS Health Scotland) as offering potential to inform further development of partnership working. This included specific opportunities for engaging with multiple-deprived and other vulnerable households, and for partners working in an island context.

4.4. However, it was also suggested that more could be done to expand and strengthen partnership working to identify and support those at risk of fuel poverty. Partnership working was described as a means of achieving better outcomes by combining partners' expertise and capacity and aligning objectives and was seen as particularly relevant in identifying those at risk of fuel poverty, for referrals and signposting and in sharing good practice. Several respondents also referred to the value of partnership working in providing clarity on roles and responsibilities, and in ensuring local agencies feel they are given appropriate status alongside national partners. The importance of clear communication between partners was also highlighted.

- 4.5. A small number of respondents saw a need to encourage a more nuanced and inclusive understanding of fuel poverty: in particular, it was suggested that the placement of fuel poverty within the housing and energy efficiency policy areas has led some partners to develop a view of fuel poverty as being primarily a housing issue.
- 4.6. As is noted above, respondents referred to learning from current examples of partnership working, but also noted the importance of flexibility to enable partnership working approaches to respond to local needs. They also reflected views that local partners have a significant role to play in identifying and supporting those at risk of fuel poverty, particularly those with more complex needs and those living in more 'difficult to treat' property types. This included some who suggested that a standardised or 'prescriptive' approach to partnership working is not likely to be effective.
- 4.7. In terms of specific services, around 1 in 6 respondents who answered the question referred to the importance of better partnership working between housing, health and social care services. Reference was made to health services having a potentially significant role to play in identifying those at risk of fuel poverty and in signposting to partners, although some difficulty engaging with health and social care services was also reported. Respondents also referred to links with HES, Community Energy Scotland, Care and Repair, Citizens Advice, energy providers, energy services providers, social landlords and third sector agencies. The value of including communities in partnership working was also highlighted, including individuals with experience of fuel poverty, and community-led projects.
- 4.8. The value of information sharing across agencies was also highlighted by respondents, particularly in relation to identification of those experiencing or at risk of fuel poverty. Some concerns were raised around the potential for forthcoming changes to data protection legislation to inhibit referrals and information sharing between agencies – including the extent to which a lack of clarity on new data protection requirements could lead to agencies being overly cautious.

Provision of advice and support

- 4.9. Respondents cited a range of projects as good practice examples of how national and local partners can work together to tackle fuel poverty. Several of these respondents emphasised the importance of projects being tailored to meet local needs, but some common themes were identified to inform on-going partnership working:
- Around 1 in 8 respondents who answered the question identified a need for more intensive, face-to-face support to address the range of factors that can contribute to fuel poverty. This included reference to developing tailored responses for households with more complex needs or living circumstances, supporting behaviour change, and providing face-to-face advocacy. Several respondents saw this as an area where local agencies can add significant value through their local knowledge, the development

of trust between local agencies and communities, and their capacity to provide more intensive support over a period of time. Some respondents saw a need for stronger recognition of the role played by local partners in this area.

- Supporting fuel poverty referrals across a wider range of workers through training and awareness raising. This included, for example, integration of fuel poverty within training and development across health services, and providing a single referral point for agencies or workers who may have limited knowledge of the fuel poverty agenda. A role for national partners, through sharing of information and training with local agencies was also suggested.
- Around 1 in 7 respondents who answered the question identified establishing partnerships with a collective responsibility for identifying and reaching those experiencing or at risk of fuel poverty, as a means of establishing common strategic objectives, coordinating activity and sharing practice. Respondents cited several existing partnerships as good practice examples including: North Ayrshire's Local Energy Advice Forum (LEAF); the Falkirk Fuel Forum; the Outer Hebrides Fuel Poverty Group and the Outer Hebrides Energy Efficiency Group; Argyll and Bute Advice Network; and Money Skills Argyll,
- While there has been effective partnership working around building improvements to mitigate fuel poverty, more is needed at a national and local level to address other causal factors. This included issues such as benefits and income maximisation, debt advice, housing and tenancy support, energy switching, energy efficiency and consumer rights.

4.10. Other suggestions, made by only one or a small number of respondents, included:

- Developing a network of locally-based 'Energycarer' services.
- Expanding partnerships and services to areas where there is a gap in provision, such as fuel billing.
- Local networks of approved service providers.
- Linking the identification of fuel poor households and access to funding, to avoid the requirement for a separate funding application.
- Delivering economies of scale for example through collective switching.
- Co-location of services.

Identifying needs

4.11. Identifying those experiencing or at risk of fuel poverty was highlighted by a small number of respondents as an area where national and local partners can work better together. Respondents sometimes referred to current approaches to identifying fuel poverty needs as potential good practice examples. Reference was also made to the Local Heat and Energy Efficiency Strategy (LHEES) as having potential to support the identification and

targeting of properties with poor energy efficiency, and where there is potential for low carbon heat.

- 4.12. Local authorities and other local agencies were seen as having a key role to play in identifying fuel poverty needs, through local knowledge and service data. Respondents also referred to a need for sharing of information and resources across health services, third sector organisations, energy providers and local delivery organisations.
- 4.13. Respondents also highlighted specific issues around identifying those experiencing or at risk of fuel poverty in remote rural and island communities. Local agencies and community-led projects were seen as best placed to identify and respond to these needs. Other groups identified as potential priorities in terms of identifying those experiencing or at risk of fuel poverty included households using prepayment meters; people with mental health needs; people with cardiovascular and respiratory conditions; those with physical disabilities; those for whom English is not their first language; and BME households. Several respondents also saw a need to access households who do not participate in existing schemes, including for example those with more complex circumstances.
- 4.14. It was suggested that the proposed fuel poverty definition may require more effective data gathering and sharing to collate the range of information required to identify those in fuel poverty. The importance of consistency in how the fuel poverty definition is applied was also highlighted, in terms of identifying those at risk of fuel poverty across Scotland.

Resourcing

- 4.15. The importance of adequate resourcing was highlighted previously in terms of enabling national and local partners working better together to address fuel poverty, but respondents also raised a number of more specific points around resourcing. A number of respondents suggested approaches to ensure that partners contribute adequate resources to enable local partnerships to identify and respond to fuel poverty. This included suggestions that contributions are made compulsory, and that local authority funding for fuel poverty is ring-fenced. Respondents also referred to a number of specific sectors or organisations where resource constraints and high workloads were seen as potential barriers to effective partnership working. It was suggested that additional resources - in terms of funding and skills - are required to enable more effective responses to fuel poverty, particularly for local authorities, health and social care services and community planning partnerships.
- 4.16. Longer-term funding was highlighted as a significant factor in enabling more effective partnership working by around 1 in 10 respondents who answered the question. Several respondents referred to the resources being spent by local partners in securing and maintaining funding, seeing this as a distraction from delivery of services. These respondents highlighted the extent to which longer-term funding would provide greater confidence and

stability for services. More broadly, a number of respondents saw a need for more flexible and less bureaucratic approaches to funding.

4.17. Other points, made by only very small numbers of respondents included:

- That more funding options are needed to remove financial barriers for households at risk of fuel poverty – for example the upfront costs of improving the energy performance of homes.
- Questioning whether social landlords will be permitted to access HEEPS and/or SEEP funding, in the context of a substantial number of those at risk of fuel poverty living in the social rented sector.

Supporting and enabling partnerships

4.18. Some respondents saw a need for the Scottish Government to provide a leadership role to ensure national and local partners have a common direction. This included suggestions for partnership working between the Scottish Government and partners at a national level, and for the placing of a requirement on national partners to work in partnership with local agencies. However, others wished to see coordination of fuel poverty programmes devolved to local authorities.

4.19. Reference was made to the positioning of fuel poverty in relation to other policies. This included concerns that positioning fuel poverty under the SEEP remit does not help to emphasise fuel poverty as a health and welfare issue, and potentially impedes work to address fuel poverty amongst vulnerable households. A need for clarity as to how fuel poverty aligns with other relevant policies, and for a consistent priority to be assigned to fuel poverty across policy areas was also suggested.

4.20. Respondents also saw a need for clear guidance for national and local partners to support more effective partnership working. This included specific reference to guidance ensuring partners have a shared understanding of fuel poverty policy objectives, providing clarity on the relative roles of national and local partners, and enabling effective sharing of information and resources across partners (particularly in the context of data protection obligations). Guidance to support monitoring and evaluation, including identification of specific targets, was also recommended.

Coordination of activity and sharing of practice

4.21. In addition to providing strategic direction and guidance, a number of respondents wished to see more pro-active national coordination of activity in relation to fuel poverty, to ensure a coherent approach across the country and to identify any gaps in provision. Some respondents wished to see a new independent body to provide this coordinating role, potentially aligned with a quality assurance role. This included suggestions for a centralised website or hub providing advice and information, and centralised collation of data on outcomes being delivered by national and local partners. Several respondents saw a role for HES here, including a perceived need for better

promotion of HES as the first point of contact for those experiencing or at risk of fuel poverty.

- 4.22. Around 1 in 10 of respondents who answered the question also saw a role for more effective sharing of good practice to support partnership working, including suggestions that the Scottish Government should do more to support this. Specific suggestions included: the establishment of an independent body to coordinate activity and share practice; a national platform for sharing of good practice; a survey of existing practice; learning exchanges; and collation of case studies as illustrations of effective approaches.
- 4.23. The need for a stronger evidence base, to assist partners in identifying those experiencing or at risk of fuel poverty and to develop a better understanding of the factors that prevent households from engaging with existing approaches was also identified.
- 4.24. As has been noted above, adequate resourcing was seen as a significant factor in enabling better partnership working. This was seen as a particular issue in the context of constraints on local authority funding, and suggestions as to the best way forward included:
- Scottish Government providing dedicated funding to support better and more widespread partnership working.
 - Scottish Government committing to longer-term funding of services.
 - Making partnership working a condition of grant funding to services.

Question 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.

- 4.25. A total of 72 respondents commented at Question 6. A breakdown of the number of comments received by respondent type is set out in Table 7 below.

Table 7: Number of comments by respondent type

Type of respondent	Number of comments
Organisations:	
<i>Community or Tenant Group or Federation</i>	4
<i>Energy Company</i>	3
<i>Health and Social Care</i>	5
<i>Housing Association</i>	7
<i>Housing Body or Group</i>	1
<i>Inter-agency Group or Partnership</i>	4
<i>Local Authority</i>	20
<i>Other</i>	6
<i>Research Group</i>	1
<i>Third Sector</i>	14
Organisations	65
Individuals	7
All respondents	72

4.26. The potential for local partners to develop more strategic approaches to tackling fuel poverty was referenced by around 1 in 4 of respondents who answered the question. Respondents emphasised the value of better partnership working to maximise the impact of local partners' activity, and often reiterated points discussed at Question 5. This included particular reference to the role of local authorities, Community Planning Partnerships and Integrated Joint Boards in leading this work.

4.27. Ensuring there is a shared commitment across partners, and that fuel poverty has a clear place alongside partners' competing priorities was also seen as important. This included specific reference to where fuel poverty fits within the wider strategic framework, including suggestions that Health & Social Care Strategic Plans should include formal recognition of fuel poverty as a priority. Alignment of local (LHEES) and national (SEEP) energy efficiency targets was also recommended in the context of enabling local partners to contribute to national aims as were:

- Action planning with local partners and communities to develop a tailored approach to meet local needs, and to maximise partners' contribution.
- Supporting trusted community organisations and other bodies to deliver local projects for those at risk of fuel poverty.

4.28. Sharing of good practice was also highlighted as significant in enabling local partners to maximise their delivery against national aims. This included reference to a number of existing mechanisms for sharing of practice, including:

- A mechanism to enable collation and sharing of good practice and information on the effectiveness of specific energy efficiency and fuel poverty measures across local authority areas, including suggestions for an online hub.
 - Local forums to provide a basis for sharing effective approaches.
 - Sharing of feedback from households experiencing fuel poverty on their experience of specific approaches and measures.
- 4.29. Sharing of good practice was also highlighted as particularly valuable for remote rural and island communities, which were seen as presenting significant challenges to local partners.
- 4.30. The value of learning from national programmes such as Keep Well and Making Every Contact Count, published papers on the effectiveness of approaches to address fuel poverty, and reports from relevant professional bodies was also highlighted.
- 4.31. As also noted in relation to Question 5, respondents saw a clear role for local partners in identifying those experiencing or at risk of fuel poverty and providing effective signposting and referral to local or national partners. This included a specific focus on the extent to which partners can draw on local knowledge to identify those at risk of fuel poverty and/or properties that might benefit from energy efficiency improvements. Front-line staff were seen as having a significant role to play in the identification of potentially vulnerable households.
- 4.32. Respondents also saw scope for local partners to help to develop a more ‘granular’ understanding of available data on fuel poverty to inform their approaches. A range of information sources potentially available through local partners was highlighted by respondents, including housing stock data, household income profiles, fuel spend and health information (including LIST and SPIRE data). Respondents also noted potential for local partners to draw on information held by energy suppliers and others with data on the energy efficiency of homes.
- 4.33. A number of specific groups were referenced by respondents as potential priorities in terms of identifying fuel poverty needs. This included suggestions that local, low income households living in social rented properties may not receive support from HES or HEEPS.
- 4.34. Respondents also referred to a broad range of practical approaches that could enable local partners to contribute to meeting national aims. Suggestions included, most frequently:
- Recognising the importance of local partners’ knowledge of local circumstances, and the extent to which this can support engagement with households who may be less willing to take up national partners’ services.

- Recognising the impact of face-to-face approaches to develop tailored responses to more complex circumstances and needs, for example in providing advocacy services for households experiencing fuel poverty. This included specific suggestions for more consistent availability of face-to-face options through HEEPS: ABS across local authority areas.
- Helping to reduce households' energy costs, for example through collective bargaining, community energy generation, and low carbon and low cost sustainable energy solutions.

4.35. Other suggestions, each made by a very small number of respondents, included:

- A focus on the full range of factors that can contribute to fuel poverty, including income maximisation, determinants of health, and supporting behavioural change.
- Minimising the number of different service providers, and service contacts required with a household to deliver an intervention or integrating fuel poverty consultations as part of how front-line staff engage with households, across sectors including health and housing.
- Co-location of services as a means of strengthening information sharing and referral arrangements.
- Identifying the key points in people's lives where they are vulnerable to fuel poverty (such as changes of ownership or occupancy, changes to the fabric of homes) and targeting support around these.
- Placing a stronger emphasis on energy efficiency and shared renewable energy production in development of social housing.

4.36. Also consistent with comments at Question 5, resourcing was highlighted as a significant issue in enabling more strategic approaches, ensuring identification of needs, and in supporting effective and sustainable approaches to tackling fuel poverty. In particular, the extent of resourcing constraints on local partners was highlighted by respondents, including examples of partners struggling to meet existing service demand. Several respondents saw a need for additional funding to support local partners to more effectively contribute to national aims. In this context, several respondents referred to the value of joint working as a means of bringing together and maximising the impact of partners' limited resources. This included reference to Integrated Joint Boards and local authorities.

4.37. Respondents also referred to the value of a dedicated paid worker to support local volunteer activity in identifying and responding to fuel poverty but suggested that few local partners are willing or able to play or fund this role.

4.38. Continuity of funding was also highlighted as an issue, including calls for longer-term funding to provide local partners with greater stability, and to focus their resources on service delivery. The potential to link project funding

with delivery of outcomes as a means of incentivising more effective partnership working was suggested.

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

4.39. A total of 74 respondents commented at Question 7. A breakdown of the number of comments received by respondent type is set out in Table 8 below.

Table 8: Number of comments by respondent type

Type of respondent	Number of comments
Organisations:	
<i>Community or Tenant Group or Federation</i>	4
<i>Energy Company</i>	3
<i>Health and Social Care</i>	5
<i>Housing Association</i>	8
<i>Housing Body or Group</i>	2
<i>Inter-agency Group or Partnership</i>	4
<i>Local Authority</i>	20
<i>Other</i>	5
<i>Research Group</i>	1
<i>Third Sector</i>	16
Organisations	68
Individuals	6
All respondents	74

4.40. Respondents suggested a number of ways in which the Scottish Government can support local partners through providing a framework within which partners can measure their impact. Around 1 in 5 of respondents who answered the question suggested that the Scottish Government should produce a reporting framework linked to the outcomes expected from partners, with content including guidance on methodology and indicators for local partners to use in measuring their impact. This was seen as a means of ensuring consistency of approach to measuring performance in the context of changes to the fuel poverty definition, offering potential for better benchmarking of services, and minimising duplication of work across partners.

4.41. Around 1 in 6 respondents who answered the question suggested that a standardised measurement/reporting tool, or potentially a centralised reporting 'hub', could further improve this reporting. Reference was made to existing monitoring approaches as offering a potential basis for a reporting

framework and tools. Respondents also referred to Social Return on Investment measures as having a potential role in a reporting framework.

- 4.42. In addition to suggestions that the Scottish Government provides a framework for measurement of local partners' success, some respondents wished to see the Scottish Government take a more proactive role by coordinating the collection of performance information. Respondents also saw potential for a central coordinating role to include sharing of good practice across local partners, with one respondent suggesting that a national scrutiny body could play a role in assessing performance data. Reference was again made to the value of reducing the administrative burden on local partners.
- 4.43. A number of respondents noted that local partners may benefit from additional training and other support to strengthen their work in tackling fuel poverty. This was most commonly related to providing partners with the skills required to ensure meaningful reporting of performance. However, a need for additional funding to local partners to support this, and potentially for funding awards to take account of monitoring and reporting requirements was also suggested. This was seen as particularly important for smaller partners who may lack the skills or capacity to develop and populate an effective monitoring system.
- 4.44. Respondents mentioned specific organisations as having a potential role to play in providing training and support to local partners, including some currently delivering fuel poverty training. It was suggested that cost can be a barrier to local partners accessing existing training provision.
- 4.45. A range of good practice points highlighted in relation to local partners' measuring and reporting on their success included:
- Local partners agreeing key targets and milestones at the outset of a project, and changes in reporting requirements during delivery being minimised.
 - Collecting qualitative information and feedback on the impacts delivered by partners, alongside quantitative measures.
 - That measurement of impacts should be meaningful to the wider public.
 - That measuring outcomes delivered for people with protected characteristics is of value.
- 4.46. It was also suggested both that local authority-level reporting of impacts has value as a means of identifying areas with higher success rates as potential examples of good practice, and that responsibility for assessment of impacts delivered by local partners should sit with a body or bodies without any vested interest in delivery of projects.
- 4.47. A small number of respondents raised concerns around the extent to which quantitative measures provide an accurate account of real world outcomes

for households. This included reference to the impact of specific interventions being dependent on factors such as how measures are installed and used, and the extent to which the energy supplier provides good value.

- 4.48. Others noted that fuel poverty interventions can deliver wider benefits that may be missed by ‘simple’ quantitative measures, with examples including improved health and wellbeing, higher educational attainment, reduced CO2 emissions, and greater resilience to minimise the risk of falling back into fuel poverty. It was suggested that local partners would require additional resources and support to develop this kind of evidence base.

Question 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?

- 4.49. A total of 66 respondents commented at Question 8a, 50 respondents at 8b and 55 at 8c. A breakdown of the number of comments received by respondent type is set out in Table 9 below.

Table 9: Number of comments by respondent type

Type of respondent	Number of comments at 8a	Number of comments at 8b	Number of comments at 8c
Organisations:			
<i>Community or Tenant Group or Federation</i>	4	2	3
<i>Energy Company</i>	2	1	1
<i>Health and Social Care</i>	5	4	4
<i>Housing Association</i>	7	6	7
<i>Housing Body or Group</i>			
<i>Inter-agency Group or Partnership</i>	5	4	4
<i>Local Authority</i>	19	14	14
<i>Other</i>	5	2	3
<i>Research Group</i>	1	1	1
<i>Third Sector</i>	12	11	13
Organisations	60	45	50
Individuals	6	5	5
All respondents	66	50	55

4.50. Significant overlap was evident in the points raised across these three questions, and also with responses to Questions 5 and 7, and a number of respondents provided a single statement which addressed one or more of these questions. The analysis below has sought to specifically identify the points raised in relation to (a) measuring outcomes, (b) reporting on outcomes, and (c) ensuring quality of service provision.

Measuring outcomes

4.51. Reflecting points raised at Question 7, around 1 in 3 respondents who answered the question saw value in the Scottish Government seeking to inform and/or coordinate how community-level organisations measure their outcomes. Suggestions were primarily focused on developing a monitoring and evaluation framework with associated indicators and guidance for organisations to use in measuring their impacts. This was seen as:

- Providing clarity to organisations on the outcomes to which they are expected to contribute.
- Ensuring consistency of approach across Scotland.
- Enabling benchmarking of services.

4.52. The extent of variation in information currently being collected by services was also noted.

4.53. Reference was also made to existing monitoring schemes and organisations that could have a role to play in developing consistent standards for measuring outcomes, including the Each Home Counts Review, and Citizens Advice Scotland's report Facing Fuel Poverty.

4.54. Respondents also suggested a role for standard templates or reporting tools that can be made available for use by community-level organisations. A small number of respondents wished to see a national portal for tracking of outcomes delivered by local partners and community-level organisations, although it was recognised that this would require significant resources.

4.55. In addition to measuring outcomes, respondents also saw a role for a standard monitoring and evaluation framework in facilitating sharing of good practice across local organisations. This included suggestions for a dedicated Scottish Government website to share information and good practice examples.

4.56. Around 1 in 7 respondents who answered the question identified a need for additional training and support to enable community level organisations to measure their impacts – again consistent with points raised at Question 7. This reflected some concerns that organisations do not have the skills or capacity to collate the data required to measure impacts in addition to ongoing service delivery. In terms of delivering training and support, suggestions included: web-based training; a role for national bodies such as

HES and Energy Action Scotland (EAS) in providing training and support; linking community organisations with academic partners; and peer review.

- 4.57. Concerns regarding the extent to which community-level organisations have the skills and resources to measure their outcomes were also linked to suggestions that additional resources will be required to enable organisations to meet these requirements. This included reference to a need for additional funding, and a need for longer-term funding. Respondents also saw value in monitoring and reporting being made a requirement of funding, although it was suggested that funding awards should take account of the additional resources required to support this.
- 4.58. Around 1 in 6 respondents who answered the question highlighted good practice points for community-level organisations measuring their outcomes. These were most commonly around ensuring the monitoring framework and associated indicators are as simple as possible, have a clear focus on the key targets to which community-level organisations are expected to contribute, and do not place a disproportionate burden on organisations. In this context, reference was made to the value of co-producing a standard approach to measuring outcomes with organisations, to ensure this is meaningful and sustainable.
- 4.59. Several respondents referred to the value of making best use of currently available data - including information already collected through funding of organisations - and focusing measurement of outcomes on filling significant gaps in available data. Respondents also suggested that the approach should recognise useful contributions across the full breadth of partners involved and contributions made, including, for example, wider health and social benefits. This included specifically for those supporting remote rural or island communities. The value of including qualitative and quantitative measures, and of identifying longer-term impacts, was also highlighted.
- 4.60. Other suggestions included:
- A tool created to allow the fuel poor to be identified could be developed further to allow calculation of the likely effect of individual interventions on changes in fuel poverty levels.
 - There should be more detailed assessment of outcomes such as comfort levels attained, household satisfaction and 'real world' energy costs for all the most vulnerable households, and a sample of other households. Use of participatory action research, designed and developed by people with lived experience of fuel poverty, was recommended as a good way to support services to monitor and evaluate the service they provide.
 - Community-level organisations should receive feedback from the Scottish Government on the outcomes identified through monitoring and reporting.
 - The potential for fuel poverty outcome measures to conflict with climate change objectives should be recognised.

- An assessment of equalities impacts should be included in monitoring of community-level organisations.

Reporting on outcomes

- 4.61. Around 1 in 7 of those who answered the question wished to see the Scottish Government produce a standard reporting framework, including specification of the key indicators to be reported. This was seen as offering particular value in terms of ensuring clarity and consistency in what organisations report, enabling aggregation of evidence to a regional and national level, supporting effective benchmarking of services, and minimising duplication of work across organisations.
- 4.62. In terms of implementing a framework, around 1 in 7 of respondents who answered the question referred to use of standard reporting templates or tools or a web-based reporting facility available to all local delivery organisations. Respondents also noted the importance of reporting that is meaningful to the wider public, including support for the use of case studies to illustrate impacts delivered by community-level organisations. It was also suggested that reporting should be encouraged to include interventions which have not delivered the anticipated outcomes.
- 4.63. Several respondents noted that any standard reporting approach should be proportionate to the skills and resources available to community-level organisations. This included, for example, the number of indicators and frequency of reporting intervals, and reference to making best use of existing reporting through funding bodies. Comments reflected concerns regarding the extent to which organisations would require additional training and other support to meet reporting requirements, particularly those with lower staff numbers. In this context, respondents noted that the Scottish Government funds HES to support local organisations in reporting on their outcomes. Some suggested that additional funding may be required, direct to organisations, to support effective reporting.

Ensuring quality of advice and support services

- 4.64. Continuity of funding for community-level and other local organisations was one of the most commonly raised issues, identified by around 1 in 6 respondents who answered the question. These respondents suggested that longer-term and more sustainable funding was necessary to enable organisations to provide the consistency of advice and support required to achieve positive outcomes. This included suggestions that time is required for organisations to establish themselves with communities, to establish effective partnerships, and to develop and share good practice. Reference was also made to research indicating that the short-term nature of some schemes can limit their effectiveness. Three to five-year funding periods were suggested here, including reference to the affordable housing programme as a potential model. It was also recommended that funding is linked to a requirement to measure and report on delivery of outcomes.

- 4.65. Linked to a perceived need for longer-term funding of community-level organisations, respondents also wished to see greater recognition of the value provided by these locally-based approaches. This included support for the role of face-to-face advocacy and support delivered by these organisations. The level of trust with local communities, extent of local knowledge and close links with other local partners were highlighted as key benefits for these organisations. Some suggested these organisations can play a particularly significant role for marginalised, vulnerable and ‘hard to reach’ households, and in remote rural and island communities.
- 4.66. Around 1 in of 6 respondents who answered the question noted the role of effective training and professional development in ensuring the quality of services provided by community-level organisations. Some suggested that a minimum level of training or accreditation should be agreed for these organisations, including reference to professional bodies, standards and national partners that could have a role to play in ensuring quality of service. Specific references included EAS, the Climate Challenge Fund’s Capacity Building Programme, Scottish National Standards for Information and Advice Providers, HES, a requirement for social landlords to provide qualified energy advisors, and the City & Guilds Energy Awareness qualification.
- 4.67. In addition to training and development, respondents saw a role for partnership working with local authorities, health and social care services, and national partners in ensuring quality of services. This included sharing of good practice examples, sharing of resources, developing local intelligence to improve the effectiveness of services, and effective referral systems. These respondents also expressed broader support for the role of robust evidence to inform delivery of services by community-level organisations.
- 4.68. The Scottish Government providing a clear strategic direction was also identified as an important element in ensuring the quality of services, by identifying the key outcomes to which organisations are expected to contribute, and by supporting the robust monitoring and reporting of delivery of those outcomes.

Question 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?**

- 4.69. A total of 67 respondents commented at Question 9 and 57 at 9a. A breakdown of the number of comments received by respondent type is set out in Table 10 below.

Table 10: Number of comments by respondent type

Type of respondent	Number of comments at 9	Number of comments at 9a
Organisations:		
<i>Community or Tenant Group or Federation</i>	4	2
<i>Energy Company</i>	3	2
<i>Health and Social Care</i>	5	4
<i>Housing Association</i>	7	7
<i>Housing Body or Group</i>	1	
<i>Inter-agency Group or Partnership</i>	4	3
<i>Local Authority</i>	19	16
<i>Other</i>	6	4
<i>Research Group</i>	1	1
<i>Third Sector</i>	11	12
Organisations	61	51
Individuals	6	6
All respondents	67	57

4.70. As at Question 8, there was significant overlap in the points raised in relation to Questions 9 and 9a, with a number of respondents providing a single statement which addressed one or both of these questions. The analysis has sought to identify the points raised in relation to enable HES to better reach vulnerable client groups, separately from broader points on enhancement of the HES approach.

Enhancing the HES one-stop-shop approach

4.71. A number of respondents noted the effectiveness of the HES one-stop-shop approach, particularly in terms of the number and range of households accessing the service. This included reference to the experience of local partners and other organisations in working with HES.

4.72. However, most of those providing comment at Question 9 suggested ways in which the service currently offered by HES could be expanded or enhanced. The key points are summarised below.

4.73. Closer working with local partners and community-level organisations was suggested by around 1 in 5 of respondents who answered the question as a means of extending the range and quality of service available to HES clients and enabling more effective referrals to HES from local services. This was linked to comments highlighting the value of locally based services, with strategic direction provided by local partnerships, in tailoring their approach to meet local needs. These services were also seen as establishing trust with communities and having greater scope to provide the ongoing bespoke

support required to achieve behavioural change, and as particularly valuable in responding to more complex needs and circumstances.

- 4.74. Around 1 in 6 respondents who answered the question linked support for closer working with local organisations to wider support for HES clients having access to more in-person support provided in, and tailored to, local communities. This approach was seen as necessary to achieve a significant improvement in take up of fuel poverty services, particularly for those with more complex needs and those living in property types in which it is more difficult to install energy efficiency measures. The 'Energycarer' service model was noted as an example of this kind of approach.
- 4.75. A role for HES in providing high quality telephone and online services, and in coordinating in-person services provided by local organisations was suggested, and also that HES could further develop engagement with local organisations as a means of providing advice and information to support staff. Some noted that HES provides a level of in-person service but saw a need for this to be expanded, potentially through community-based events/workshops and home visits, and with a particular focus on areas with limited locally-based provision.
- 4.76. Several respondents noted that more intensive, in-person support requires appropriately trained staff or volunteers and is significantly more resource-intensive than telephone or web-based approaches. The need for additional funding to HES and/or locally based organisations to support this, and also to expand the reach of other national and local services was suggested by around 1 in 8 respondents who answered the question.
- 4.77. In addition to delivery of services, respondents also saw potential for HES to work more closely with partners to identify households experiencing or at risk of fuel poverty. This included specific reference to health and social care services, Warmer Homes Scotland and HEEPS: ABS contractors as having an important role in identifying potential need for HES services. Community level organisations were also seen as an important referral route for digitally excluded households, or those more likely to approach services in person. Respondents also saw a need for improving awareness of referral processes to strengthen links with these organisations, potentially building on existing partnership working and promotion of the online referral portal to achieve this. Improving awareness of HES across the population more widely was also suggested as a means of improving take-up.
- 4.78. In addition to the above points, respondents also made a number of more specific suggestions for extension or modification of the one-stop-shop approach:
- Providing a single point of contact to support households with more complex needs through the process of assessing needs and delivering interventions.

- Making a web-based version of the Home Energy Check available to partner agencies, for example for completion during home visits.
- Developing a pack of information and advice on energy efficiency, potentially including promotion of smart metering.
- Prioritising affordable warmth visits.
- Better use of Home Analytics data to identify potential need for services.
- Separating delivery of the fuel poverty service from transport, water use and other advice services.
- Ensuring staff have specific training to enable them to meet the needs of people with protected characteristics.
- Assess the full 'customer journey' for households using HES services, and in particular the extent to which homeowners take forward HES advice.
- Including a comprehensive tariff and switching advice service as part of the one-stop-shop approach.
- Roll out of the 'HES Homecare' pilot.
- Working to align the roll out of smart meters with the planned roll out of SEEP.

Enabling HES to reach those most vulnerable to fuel poverty

4.79. A number of those commenting on the one-stop-shop approach indicated that the points highlighted above in relation to HES's overall approach, would also help to better reach vulnerable households. The key approaches identified as most relevant to more vulnerable households were:

- More use of outreach and in-person approaches, including use of the local organisations that vulnerable households are more likely to choose to engage with as a means of identifying needs and/or providing fuel poverty services. This included reference to potential for co-location with other services. These approaches were suggested by around 1 in 3 respondents who answered the question. Respondents referred specifically to local authorities, health and social care services (including GP surgeries), social landlords, Citizens Advice Scotland and the Social Security Agency.
- More use of in-home and other face-to-face approaches, as a means of providing the bespoke service required by households with more complex needs and living circumstances, was suggested by around 1 in 4 of those who answered the question. This included suggestions that the most vulnerable households are less likely than others to engage with telephone-based services – and reports of vulnerable households having been discouraged by their initial call to HES. Several respondents noted that additional resourcing is needed to support these approaches to better reach vulnerable households – through HES or local organisations.

- Raising awareness of the services provided by HES across local organisations and the wider public. This included suggestions for a national advertising campaign, and promotion through local authorities.
- Targeting locations and population groups most vulnerable to fuel poverty, and/or with more limited access to HES services. This included specific mention of those: with a health condition or disability; with mental health needs; affected by welfare reform; living in remote rural and island communities; with protected characteristics; living in digitally excluded households; and others who may be less confident using telephone-based services.
- Establishing data sharing agreements with key partners to support a more coordinated identification and response to fuel poverty.

5. Targets and indicators

Summary of Questions 10 to 12

- Respondents often made a general statement welcoming the proposal to set a new statutory target to eradicate fuel poverty in the Warm Homes Bill.
- Some felt it is not correct to refer to eradication if the target is to reduce fuel poverty to below 10%. Others argued that the Scottish Government *should* be aiming to completely eradicate fuel poverty.
- Respondents sometimes made a statement welcoming or supporting the inclusion of sub-targets. Some respondents saw the sub-targets as challenging but achievable, while others felt they are not ambitious enough. There was a similar divergence of opinion on the proposed timeframes.
- Those who commented specifically on the sub targets tended to be broadly supportive.
- Although there was support for the inclusion of interim milestones, there were concerns that the levels and timeframes proposed are not, or may not be, sufficiently challenging.

5.1. The consultation paper notes that gains made in the last 10 years to address some aspects of fuel poverty have been outstripped by other factors which are beyond the Scottish Government's control, primarily rising fuel prices, and that this will continue to be a challenge. The Warm Homes Bill is being introduced to enshrine the ambition to eradicate fuel poverty in legislation, and it is proposed that the Bill should include a new statutory target to eradicate fuel poverty.

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

5.2. A total of 84 respondents provided an answer to Question 10. A breakdown of answers by respondent type is set out in Table 11 below.

Table 11: Number of comments by respondent type

Type of respondent	Number
Organisations:	
<i>Community or Tenant Group or Federation</i>	4
<i>Energy Company</i>	5
<i>Health and Social Care</i>	5
<i>Housing Association</i>	8
<i>Housing Body or Group</i>	3
<i>Inter-agency Group or Partnership</i>	5
<i>Local Authority</i>	20
<i>Other</i>	7
<i>Research Group</i>	2
<i>Third Sector</i>	16
Organisations	75
Individuals	9
All respondents	84

5.3. Around 1 in 2 respondents who answered the question made a general statement welcoming the proposal or supporting it in principle. Around 1 in 5 respondents who answered the question identified a statutory target as being important or essential, helpful or useful, and such a target was also suggested to demonstrate Government commitment, or to provide a means to monitor progress. Other respondents also suggested targets to be important or useful but did not state clearly whether they thought targets should be statutory.

5.4. Although some respondents who supported the proposals suggested them to be realistic, ambitious, or challenging but achievable targets, others who generally supported the idea of a target expressed reservations about the targets proposed, most frequently:

- Querying use of ‘eradicate’.
- Suggesting the target – or more specifically the sub targets – lack ambition or should be more ambitious.
- Noting the factors over which the Scottish Government has little or no control, primarily the price of energy but also changes in individual circumstances and the effects of Brexit.
- Highlighting the need for adequate resources to be made available.
- Pointing to the lack of practical information in the consultation paper on how the targets will be delivered.
- Suggesting that there are particular issues for some communities, particularly those in rural and island areas that need to be addressed.

- 5.5. These are discussed below. A very much less common view was that a statutory target will have no meaningful effect, or is unenforceable, or may not be achievable and that it is better not to set an unachievable target.

Eradicate

- 5.6. Around 1 in 8 respondents who answered the question made points concerning use of the word 'eradicate'. Some respondents thought that this is not right word if the target is actually to reduce fuel poverty to below 10%, with suggested alternatives including 'resolve', 'reduce', or minimise 'as far as reasonably practicable'. Others argued that the Scottish Government should be aiming to completely eradicate fuel poverty or should set a date by which this will occur, or that fuel poverty should be eliminated by 2040. It was suggested that the 10% figure proposed would still leave in the region of 280,000 households experiencing fuel poverty. It was also noted that while the statutory target is to 'eradicate' fuel poverty, the sub-target to reduce it to 10% is not statutory.

More ambition

- 5.7. Around 1 in 9 respondents who answered the question suggested that the existing targets should be more ambitious, with alternative levels or timeframes proposed including:
- Eradication of extreme fuel poverty within 5 years.
 - Reduction to below 5% before 2040.
 - Reduction to 10% in 10 years, 5% in 15 years, and zero in 20 years.

Factors outwith Scottish Government control

- 5.8. Around 1 in 8 of those who answered the question observed that the Scottish Government has little control over fuel costs or suggested that, without any means of controlling energy prices, the targets may be unachievable. More generally it was suggested that the Scottish Government does not have the necessary tools available within devolved responsibilities. Similar points were also made in responses at Question 11.
- 5.9. A small number of respondents argued, however, that there should be an emphasis on reducing fuel costs and it was noted that one of the things the Scottish Government can do is to support affordable energy initiatives, such as district heating schemes for example.

Resources

- 5.10. Around 1 in 9 of those who answered the question highlighted the importance of adequate resources being made available. The types of resources referenced included funding and clearly identified budgets. It was also suggested that a sizable input would be needed, or that there need to be detailed assessments to determine the interventions that will be required to meet the targets and the costs involved, or whether the sub targets are achievable in the time identified.

Delivery

- 5.11. Several respondents noted that the consultation paper contains little information on how the proposed targets will actually be delivered. Elements suggested to be important included: widespread, co-ordinated action; involvement of all stakeholders; deployment of a range of measures including different approaches to those tried before; measurable targets; annual targets; and a system of monitoring and reporting that allows action to be taken if a target is likely to be missed. The need for independent review and scrutiny was also highlighted, and the consequences of a target being missed were questioned. The role of new Fuel Poverty Advisory Panel was suggested to be crucial to success.
- 5.12. It was argued that there should be a focus on all drivers of fuel poverty, not just improvements to the fabric of homes. The importance of lifestyle factors, and the need for education on energy conservation and reducing fuel bills were highlighted, with one respondent suggesting the importance of funding delivery organisations in person-centred outreach work with vulnerable individuals.
- 5.13. Although several respondents cautioned against a continued focus on energy efficiency improvements to buildings, predicted that owners/private landlords may be reluctant to invest in upgrading properties, or suggested some householders may not want internal insulation, other respondents saw further upgrading Scotland's housing stock as being crucial to delivering the targets.

Different targets for different communities

- 5.14. A number of respondents made specific reference to the high levels of fuel poverty in remote, rural or island communities including drawing attention to a local target of getting fuel poverty in Orkney to the national average by 2022 and eradicating fuel poverty by 2032. Specific suggestions included:
- That the definition of fuel poverty must be adjusted to incorporate rural and island characteristics before targets are set.
 - There could be specific measures – such as help to develop supply chains to remote communities.
 - Targets should be broken down to allow monitoring at a local level including for remote rural, accessible rural and urban communities. Flexibility to allow local communities to work effectively was suggested to be important.
- 5.15. It was also asked that disparate rate of poverty among equalities groups should be taken into consideration, since certain groups are more likely to experience fuel poverty. It was suggested measurement of the targets should be broken down by relevant protected characteristic.
- 5.16. Other suggestions at Question 10 included that:
- The Warm Homes Bill should be the subject of a separate consultation.

- Local authorities should be given a duty to eradicate fuel poverty.
- The ‘surcharge’ of around 2p per unit paid for electricity in the Highlands and Islands should be removed.

5.17. Also within Section 5 the consultation paper sets out the Scottish Government’s proposed sub-targets which are:

- The overall fuel poverty rate will be less than 10% by 2040;
- Ensure the median household fuel poverty gap is no more than £250 (in 2015 prices before adding inflation) by 2040; and
- Remove energy efficiency as a driver for fuel poverty by ensuring all homes reach a minimum energy performance rating by 2040.

Question 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?**

5.18. A total of 72 respondents provided an answer at Question 11a and 61 at Question 11b. A breakdown of answers by respondent type is set out in Table 12 below. Since respondents at 11b often referred back to 11a, and views on levels and timeframes often tended to overlap, the analysis below covers all material at Question 11.

Table 12: Number of comments by respondent type

Type of respondent	Number of comments at 11a	Number of comments at 11b
Organisations:		
<i>Community or Tenant Group or Federation</i>	2	1
<i>Energy Company</i>	5	4
<i>Health and Social Care</i>	4	3
<i>Housing Association</i>	7	6
<i>Housing Body or Group</i>	3	2
<i>Inter-agency Group or Partnership</i>	5	4
<i>Local Authority</i>	20	16
<i>Other</i>	4	4
<i>Research Group</i>	2	2
<i>Third Sector</i>	13	12
Organisations	65	54
Individuals	7	7
All respondents	72	61

General comments

- 5.19. Around 1 in 4 respondents who answered the question made a statement welcoming or supporting the inclusion of sub-targets or noting that they approved in principle. A much smaller number specifically questioned or opposed the sub-targets, sometimes because they considered the statutory target discussed at Question 10 to be unachievable and took a similar view on the sub-targets or because of a view that the sub-targets do not help understanding of fuel poverty and risk over-reliance on statistical information. It was also suggested the sub-targets may be too ambitious or may not be achievable within current devolved responsibilities, and that both the potential impacts of the policy tools available to the Scottish Government and the minimum financial investment required to meet targets should be evaluated.
- 5.20. Although around 1 in 7 of those who answered the question suggested the sub-targets to be challenging, ambitious but achievable, or realistic, around 1 in 4 expressed a view that they are not ambitious enough or that they lack urgency. A small number of respondents also queried how the sub-targets and timeframes have been arrived at or why they are not being made statutory, sometimes arguing they are meaningless unless statutory.
- 5.21. With respect to timeframes, around 1 in 7 of respondents who answered the question stated their support or suggested the timeframe to be challenging/ambitious, reasonable, realistic or appropriate, and in line with SEEP targets. It was also suggested that long-term targets can provide stability, but also that it may be difficult to sustain momentum over such a long period and hence that the interim milestones are very important. Around 1 in 5, however, suggested that the timeframe is too long, sometimes drawing attention to the potential consequences of fuel poverty for an ageing population with increasing levels of disability, the impact on children, and that another generation will experience fuel poverty. Specific suggestions included annual targets or reporting requirements and 5-year sub targets.
- 5.22. Other comments on the sub-targets in general included that:
- Progress should be measured against all drivers of fuel poverty.
 - Use of 'sub-targets' is potentially confusing and 'indicators' would be preferable. It was also suggested that, as drafted, these targets may not be easily understood by members of the public and that simple, non-technical language is needed.
 - The targets provide a useful framework against which to measure progress and that the Strategy could provide detail on how the sub-targets will be met across all tenures.
 - SMART targets for different organisations and sectors should be developed together with people who have experienced fuel poverty.
 - Collection of qualitative data from people with lived experience of fuel poverty will be important to assess the effectiveness of the Strategy.

- Expressing the targets and milestones in terms of the annual rate of change or improvement would allow more regular and constant monitoring of progress.
- It would be helpful to consider how targets are aligned with other related policy goals - such as that on child poverty - and that such an approach might allow fuel poverty targets to be met more quickly.
- Time frames should be more closely aligned with those for carbon reduction, the Climate Change Bill or the Scottish Energy Strategy.

5.23. The higher levels of fuel poverty found in remote or rural communities was noted in particular and it was argued that rural areas are less likely to meet the sub-targets. The validity of the modelling used in the consultation paper with respect to rural areas was also questioned. Suggestions included:

- Consideration should be given to setting local authority-specific or regional targets in rural or island areas.
- A targeted approach is needed to ensure rural poverty rates are not concealed within national figures.

Sub-target 1: The overall fuel poverty rate will be less than 10% by 2040

5.24. While some respondents who commented specifically on the first sub-target suggested it to be challenging but achievable others argued it should be more ambitious or observed that reducing fuel poverty to less than 10% is not the same thing as eradicating it and that this requires clarification. Respondents who suggested that the proposed level is too high sometimes argued that the 10% target would leave too many households in fuel poverty. Alternative levels and timeframes, including eradicating extreme fuel poverty as a priority, were suggested.

Sub-target 2: Ensure the median household fuel poverty gap is no more than £250 (in 2015 prices before adding inflation) by 2040

5.25. Around 1 in 7 of those who answered the question thought inclusion of sub-target 2 to be generally positive. However, it was also suggested to be inconsistent with the aim of eradicating fuel poverty by 2040.

5.26. Respondents also suggested that better explanation is required, with specific queries including:

- Why £250 has been chosen.
- Why a median rather than mean value is suggested. It was suggested both that £250 is still a large sum for a household struggling to pay heating bills and that use of median figures could mask those households needing to spend very large sums on heating.

5.27. Other points on the fuel poverty gap were limited but included that:

- The target should be to eliminate rather than reduce the fuel poverty gap with a specific suggestion that this should be achieved within 10 years.
- The fuel poverty gap tends to be greater in homes that are off-gas grid and not able to benefit from certain cheaper energy schemes. Delivery of increased energy efficiency measures to such households, generally in rural areas, was highlighted as important if the target is to be met.
- A measure of awareness and understanding of how to manage energy within a household should also be included.

Sub-target 3: Remove energy efficiency as a driver for fuel poverty by ensuring all homes reach a minimum energy performance rating by 2040.

- 5.28. Although around 3 in 10 of those who answered the question welcomed this sub-target, or suggested it to be ambitious, even over a long period, some thought it should be achieved sooner than 2040. It was also noted that since responsibility for housing is devolved to the Scottish Government, this area may be more important to the overall aim of eradicating fuel poverty than those where powers still sit with the UK Government.
- 5.29. In contrast, a small number of respondents argued that energy efficiency ratings are unreliable or misleading as a measure of fuel poverty, that this approach proved unhelpful in the previous Strategy and should not be used here.
- 5.30. A number of respondents noted that the minimum acceptable energy efficiency standard has yet to be defined and that this detail is needed. Amongst those respondents who gave their views on what the level should be the majority suggested the initial target should be EPC band C and sometimes that a higher band should be achieved by 2040. In terms of dates, respondents suggested that band C might be required by 2025, 2030, and 2035. It was also suggested both that very challenging targets will need to be set in the owner occupied and private rented sectors in order to meet the target, and also that the minimum level required could be tenure-specific. More detail on what the progress indicator will be was requested.
- 5.31. A small number of respondents expressed reservations about the EPC system, and the number of properties that may struggle to meet required standards. Specifically, it was argued that:
- The EPC rating is not a good proxy for fuel poverty since the actual thermal performance of a property depends on other factors, including lifestyle choices of the occupants.
 - The EPC system needs to be made fit for purpose, including making allowance for use of energy generated from renewable energy projects, particularly in the Highlands and Islands.
 - Some older properties (including the hard-to-treat) may struggle to meet the minimum standards required and that exceptions may be required, or

that more expensive and difficult to install measures will need to be used in such properties.

- 5.32. The need for significant funding, including to the private sector, was highlighted as important if this sub-target is to be achieved. It was also suggested that setting a target will encourage investment decisions, although that, given potential technological advances, it is difficult to know what may be available in the future. Associated benefits in generating jobs were also suggested.

Other potential targets or monitoring suggestions

- 5.33. A small number of respondents suggested additional targets or actions including:

- There should be a sub-target relating to directing support to off-gas grid households.
- There should be additional sub-targets relating to identification of households at high risk of fuel poverty.
- Sub-targets should reflect the length of time a household has been in fuel poverty to help to understand how long term the issue of fuel poverty is for some households.
- Fuel poverty severity bands – considered by the Definition Review Panel in their recent report – should be used to measure and monitor progress.
- The impact of the Fuel Poverty Strategy on health and wellbeing, local job creation and energy security should be monitored and evaluated.

- 5.34. The consultation paper also sets out the Scottish Government's proposed interim milestones to 2030 which are:

- The overall fuel poverty rate will be less than 20% by 2030;
- Ensure the median household fuel poverty gap is no more than £450 (in 2015 prices before adding inflation) by 2030; and
- Progress towards removing energy efficiency as a driver for fuel poverty by ensuring all homes reach a minimum energy performance rating.

Question 12 - What are your views on the proposed interim milestones?

- a) What are your views on the proposed levels?**
b) What are your views on the proposed timeframe?

- 5.35. A total of 66 respondents provided an answer to Question 12a and 53 at 12b. A breakdown of the frequency of answers by respondent type is set out in Table 13 below. As at Question 11, the analysis below considers all these responses together.

Table 13: Number of comments by respondent type

Type of respondent	Number of comments at 12a	Number of comments at 12b
Organisations:		
<i>Community or Tenant Group or Federation</i>	2	1
<i>Energy Company</i>	4	3
<i>Health and Social Care</i>	3	3
<i>Housing Association</i>	6	6
<i>Housing Body or Group</i>	3	2
<i>Inter-agency Group or Partnership</i>	5	4
<i>Local Authority</i>	20	16
<i>Other</i>	6	2
<i>Research Group</i>	1	1
<i>Third Sector</i>	10	10
Organisations	60	48
Individuals	6	5
All respondents	66	53

General comments

- 5.36. Given the relationship between sub-targets and milestones, views expressed at Question 12 tended to reflect positions set out at Question 11 and some respondents simply referenced their earlier answer or restated general concerns, often with respect to the particular problems in rural and island areas or specific concerns regarding the proposed definition of fuel poverty as it applies to rural areas.
- 5.37. Around 1 in 3 respondents who answered the question supported inclusion of the interim milestones, with comments including that they are reasonable or realistic, useful, ambitious or challenging, or essential to ensure accountability and that attention remains focused on fuel poverty. Respondents who expressed support for the proposed timeframe, sometimes suggested it to be reasonable or sensible/manageable. A small number of respondents who, in principle, had opposed the inclusion of the sub-targets also argued against inclusion of interim milestones.
- 5.38. The reservations expressed about the milestones were most likely to be that the levels and timeframes proposed are not, or may not be, sufficiently challenging (in the view of around 1 in 4 respondents who answered the question) or that they represent only very modest reductions on present levels of fuel poverty.
- 5.39. **Additional or lower milestones:** Specific points made included a suggestion that there should be more interim milestones with one respondent

noting that the present proposals would not require a formal assessment of progress during either this or the next Parliament. Alternative proposals included that:

- There should be additional milestones prior to 2030 or additional milestones relating to the new Advisory Panel's reports.
- Additional milestones should be a 20% reduction year on year to 2023, and a 10% reduction year on year to 2028.
- There should be a milestone of 10% by 2030, with a reduction to below 5% by 2040.

5.40. **Earlier milestones:** It was also suggested that interim milestones should be brought forward: to 2025 with an end date of 2030; or that the process should be compressed to achieve eradication of fuel poverty within 15 years.

5.41. **Local milestones:** It was noted that levels of deprivation will vary between areas, and the rate of progress locally will be influenced by different factors. Small numbers of respondents proposed different milestones be set for different local authority areas or that, if localised sub-targets are set, then milestones should follow suit.

5.42. It was also suggested that the milestones should not be set until the overall targets have been agreed.

5.43. Other comments related to review and reporting and included that:

- Milestones should be reviewed at intervals. It was also argued that there should be a review prior to 2030 to establish whether interventions are having the desired effects and allow changes to be made if necessary. The proposed independent review of delivery in 2031 was suggested to be welcome but to be a long time wait to find out if measures are working.
- Outcomes should be reported to the Scottish Parliament on an annual basis.

Interim milestone 1: The overall fuel poverty rate will be less than 20% by 2030

5.44. Comments specifically on milestone 1 were typically that it is not ambitious enough, with around 1 in 6 of respondents who answered the question noting that the figures set out in the consultation paper suggest that only a small percentage of households would be removed from fuel poverty by 2030. This was suggested to be both too slow of itself, but also to represent insufficient progress towards the target for 2040.

5.45. A small number of respondents made specific reference to recent Scottish House Condition Survey figures reporting a reduction of 4.3% in fuel poverty

between 2015 and 2016.¹³ It was suggested that this demonstrates more ambitious targets than those defined by this milestone to be achievable.

Interim milestone 2: Ensure the median household fuel poverty gap is no more than £450 (in 2015 prices before adding inflation) by 2030

5.46. There were relatively few comments specifically relating to milestone 2. A small number of respondents expressed support although sometimes noting that they were unclear how this milestone has been set.

5.47. Respondents who disagreed with the second milestone did so either because they opposed the corresponding sub-target or because they considered that the level is neither sufficiently ambitious in itself, nor does it set the right path to reach the target set for 2040.

Interim milestone 3: Progress towards removing energy efficiency as a driver for fuel poverty by ensuring all homes reach a minimum energy performance rating

5.48. Around 1 in 6 of respondents who answered the question noted that the consultation paper lacks detail with respect to milestone 3, sometimes suggesting that this is therefore too vague or not an acceptable milestone. Suitable milestones suggested included:

- The level should be set as EPC band D or higher by 2025, in line with the minimum standard proposed for properties in the private rented sector.
- That a majority of homes should reach band C by 2025.

¹³ This drop is based on the current definition of fuel poverty.

6. Monitoring, evaluation and reporting

Summary of Questions 13 to 18

- A number of respondents commented on the importance of taking a partnership approach and felt that this should be reflected in the membership of the new Fuel Poverty Advisory Panel.
- Suggestions as to those who should be included people who represent the rural and island perspective, with direct experience of working in the field of fuel poverty and with lived experience of fuel poverty.
- It was suggested that the proposal for 4 yearly reporting does not seem sufficient. Annual, outcome-focused reporting was proposed as better way forward.
- In terms of the new Advisory Panel's priorities for its first year, there were suggestions around strategic and policy work, monitoring progress, developing definitions and the evidence base and supporting partnership working.
- The most frequently used proxies were Council Tax Records, Scottish Index of Multiple Deprivation (SIMD) data and being in receipt of social welfare benefits.
- There were mixed views on the use of proxies, although most who commented suggested the door-to-door approach is an effective, if resource intensive, way of gathering accurate information.
- There was support for the development of a tool which allows for easy identification of fuel poor households. However, others had significant reservations. Concerns included that it would or may not be well received by householders and by vulnerable householders in particular.

- 6.1. Section 6 of the consultation paper asked six questions covering monitoring, evaluation and reporting.
- 6.2. The first two of these (Questions 13 and 14) focused on new governance arrangements that are being implemented to replace the old Scottish Fuel Poverty Forum. Ministers have approved a proposal for two new bodies to be established, an independently chaired Scottish Fuel Poverty Advisory Panel and a Partnership Forum. The new Advisory Panel will be a smaller, strategic group which will meet at five times per year. The Partnership Forum will have a wider membership and will meet a minimum of once per year, with the potential to meet a second time within the same year if required.
- 6.3. The Scottish Government expects these new groups to be operational by early 2018.

Question 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?

6.4. A total of 62 respondents commented at Question 13. A breakdown of the number of comments received by respondent type is set out in Table 14 below.

Table 14: Number of comments by respondent type

Type of respondent	Number of comments
Organisations:	
<i>Community or Tenant Group or Federation</i>	3
<i>Energy Company</i>	2
<i>Health and Social Care</i>	3
<i>Housing Association</i>	7
<i>Housing Body or Group</i>	3
<i>Inter-agency Group or Partnership</i>	5
<i>Local Authority</i>	18
<i>Other</i>	3
<i>Research Group</i>	2
<i>Third Sector</i>	9
Organisations	55
Individuals	7
All respondents	62

The overall approach to monitoring

- 6.5. A number of respondents commented on the importance of establishing an approach to monitoring from the outset. This was often associated with the approach forming part of the terms of reference for the groups or being clearly set out in the Fuel Poverty Strategy. On this latter point it was suggested that the Strategy should include a Monitoring and Evaluation Plan.
- 6.6. There were also comments on how the framework for monitoring of progress should be developed. These included that the new Advisory Panel and Partnership Forum should be responsible for developing the approach to monitoring, including Key Performance Indicators (KPIs) which they would then use to monitor progress. It was suggested that key stakeholders should be involved in this work.
- 6.7. However, concerns were raised about the lack of information on how the new Advisory Panel and Partnership Forum would be accountable to the public. A small number of respondents raised other concerns, including that it is not clear that the new Advisory Panel will be able to challenge Ministers if sub-

targets are not met. It was suggested that the groups need to have sufficient powers to ensure that plans are implemented and revised if required.

- 6.8. Finally, there were some concerns that the low frequency of meetings proposed makes it hard to see how the new Advisory Panel could effectively influence the delivery of the proposed sub-targets and milestones.

The composition of the new Advisory Panel and Partnership Forum

- 6.9. Around 1 in 9 respondents who answered the question commented on the importance of taking a partnership approach to tackling fuel poverty and felt that this should be reflected in the membership of the new Advisory Panel and Partnership Forum.
- 6.10. On membership, there was a question as to how transparency of membership will be achieved and a comment that having further details about how the groups' members would be appointed and by whom would be helpful. There was also a suggestion that the membership of the two groups should be on public record.
- 6.11. Suggestions as to those who should be included in the membership of the groups were people:
- Who represent the rural and island perspective. This issue was raised by around 1 in 8 of those who answered the question. A specific suggestion was that the composition of both groups should be prescribed to ensure that the interests of rural and remote rural Scotland are represented.
 - With direct experience of working in the field of fuel poverty, such as in-home energy advisors. This could also include local delivery partners.
 - With lived experience of fuel poverty. The Experience Panels established under the devolution of social security was cited as an example of involving people with lived experience in the decision-making process.
 - From the protected characteristics groups set out in the Equality Act 2010.
 - Representing any regional fuel poverty groups that might be established.
 - Representing each of the Regional Networks.¹⁴

Type and quality of data

- 6.12. A number of the comments referred to the type and quality of data and information which should be used to inform the monitoring of progress. General comments included that robust processes and accurate and robust data will be required and that the approach should be evidence-based. It was also noted that there are different levels at which progress can be monitored and that at the national level this is likely to be achieved through the use of national and other survey data. At a local level, it was suggested that a

¹⁴ The Regional Networks were set up in 2008 to help Registered Tenant Organisations to engage with the Scottish Government on issues of national policy.

means through which the quality of local partnership working can be evaluated in different parts of the country should be established. An early priority for the new Advisory Panel should be the development of methods by which relevant local partnerships can be identified and feedback on their performance provided.

- 6.13. It was suggested any monitoring approach should draw on data already being gathered. A number of respondents made specific reference to the use of data gathered through the SHCS, including seeking clarification around how it will be used by the new Advisory Panel or Partnership Forum.
- 6.14. However, a small number of respondents were of the view that SHCS data is not robust at the local level, including for some rural local authorities because of the sample size¹⁵. More generally, there was a view that that significant additional work on top of what is currently measured and reported through the SHCS will be required and it was suggested that local authorities, Registered Social Landlords and HES could have a role to play. It was also suggested that the groups should have full access to all relevant Scottish Government information.
- 6.15. In terms of the overall approach to be taken, it was felt that the new Advisory Panel should facilitate the use of real data in monitoring and analysis of policies and projects, and that this approach should go beyond basic measures such as numbers of installations and the very basic assumptions used to model energy use. There were also suggestions about the types or sources of other data or evidence that should be used. These included:
- Mapping of progress across Scotland.
 - Data from the EPC Register.
 - Localised Fuel Poverty surveys. These could be standardised survey with higher sample rates than the SHCS.
 - Good practice examples.
 - Evidence of the effectiveness of fuel poverty funding schemes and advice and advocacy.
 - Customer satisfaction information.
- 6.16. It was also suggested that there should be a review of the current proxies, for example Council Tax banding, available for different fuel poverty schemes.

Reporting

- 6.17. It was suggested that the proposal for 4 yearly reporting does not seem sufficient. Annual, outcome-focused reporting was proposed as better way forward. Other suggestions concerning the approach to reporting included:

¹⁵ The SHCS is designed to produce nationally representative estimates of key statistics annually, and local authority representative estimates by combining data over a three-year period.

- Progress should be reported to Scottish Ministers or the Scottish Parliament.
- Reporting should cover progress made in meeting targets and milestones that relate specifically to rural and remote rural Scotland.
- Reporting should be broken down by at risk groups. The potentially disparate outcomes for equalities groups, including BME groups, disabled people, and women should be considered.
- Local Authorities should report on partnership working.

6.18. Queries included whether the reports of the new Advisory Panel and Partnership Forum will be published. It was also noted that Scottish Government's second consultation on Local Heat and Energy Efficiency Strategies (LHEES) proposes that fuel poverty and climate change are reported through LHEES. It was suggested that further consideration and clarity may be required as to how these proposals will fit with the Scottish Government's new Fuel Poverty Strategy.

6.19. A number of respondents focused on any reporting requirements placed on other organisations, including commenting that they should be simple and easy to understand. It was suggested that guidance should set out a framework for public reporting requirements for local authorities, partnership organisations and local delivery partners.

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

6.20. A total of 64 respondents commented at Question 14. A breakdown of the number of comments received by respondent type is set out in Table 15 below.

Table 15: Number of comments by respondent type

Type of respondent	Number of comments
Organisations:	
<i>Community or Tenant Group or Federation</i>	2
<i>Energy Company</i>	2
<i>Health and Social Care</i>	4
<i>Housing Association</i>	8
<i>Housing Body or Group</i>	3
<i>Inter-agency Group or Partnership</i>	5
<i>Local Authority</i>	19
<i>Other</i>	4
<i>Research Group</i>	2
<i>Third Sector</i>	9
Organisations	58
Individuals	6
All respondents	64

6.21. A small number of respondents simply agreed with the focus of the new Advisory Panel’s work as set out in the consultation paper.

Strategic and policy work

6.22. It was felt that the new Advisory Panel’s key objective should be to operate as an effective oversight body for the Fuel Poverty Strategy and to ensure that the Strategy and Targets are clear. A suggested priority for new Advisory Panel’s first year of operation was to identify policy commitments that will have an impact on tackling fuel poverty. The new Advisory Panel would then focus on determining whether sufficient action is being taken in each policy area and identifying any gaps in action within any policy area. It was also suggested that the new Advisory Panel should:

- Have a role in influencing the upcoming Warm Homes Bill to ensure that it reflects the Fuel Poverty Strategy, Targets, and Milestones.
- Focus on introducing a requirement for action on fuel poverty to be included in Health and Social Care Strategic Plans, linking in to the similar requirements in Local Housing Strategies.
- Scrutinise the contracting of all delivery services to ensure their conditions are best suited to the organisations best placed to support fuel poor and otherwise vulnerable householders.
- Have a clear focus on action, including putting programmes that reduce fuel poverty in place.

6.23. Other comments suggested priorities relating to the workings of the new Advisory Panel and included setting Terms of Reference and developing a Business Plan and Communication Strategy. Raising the public profile of the new Advisory Panel, and the work it would be doing, was also seen as an important priority. As the previous question, there were also comments about the composition of the new Advisory Panel and it was suggested that ensuring the new Advisory Panel is made up of people from as wide a range of backgrounds as possible should be a priority.

Monitoring of progress

6.24. Very much in line with comments at the previous question, around 1 in 5 of respondents who answered the question felt that establishing an outcomes focused monitoring and evaluation framework and scrutiny programme was a priority. A specific suggestion was that developing a system to measure the affordable warmth outcomes of the new Fuel Poverty Strategy should be a priority. It was also suggested that priority should be given to the standardisation of monitoring and reporting.

6.25. Further comments included that any scrutiny programme should be linked to the work of other relevant agencies, such as the Poverty and Inequality Commission, and strategies, such as the Energy and Child Poverty Strategies.

6.26. As at previous questions, the importance of ensuring any monitoring approach works for rural areas was highlighted. It was also suggested that the new Advisory Panel should develop a strategy to adequately assess, monitor and improve the situation for people with protected characteristics. The example of fuel poverty among Gypsy/ Traveller communities was given as an example and it was suggested that the new Advisory Panel may wish to identify equality targets to monitor progress going forward.

Definitions and evidence

6.27. Around 1 in 6 of respondents who answered the question also identified a range of priorities associated with reviewing and researching definitions, including that for fuel poverty. Suggestions included that fuel poverty definitions need to be reviewed to ensure that they cover vulnerable people, fuel poor people and do not discriminate based on geography. It was suggested that the new Advisory Panel must ensure that the final fuel poverty definition is fit for purpose and allows all areas of the country the flexibility to tackle fuel poverty in their area.

6.28. Specific elements which respondents wished to see reviewed included:

- The scale and nature of fuel poverty across the country and how it is being tackled currently. A specific suggestion was that the new Advisory Panel could assess the extent to which SHCS data provides an accurate picture of rural fuel poverty or fuel poverty at a small area level. The

mapping of the national and local support currently available was also suggested.

- The definition of vulnerability.
- Age thresholds.

6.29. A specific suggestion was that an independent group of public health experts should be commissioned to develop a list of health and disability categories, as well as age bands, that would satisfactorily encompass the term “vulnerable to the adverse health and wellbeing impacts of living in fuel poverty”. Reference was also made to taking up the recommendations in the report on the MIS for rural Scotland.

6.30. Identifying gaps and developing an approach to gathering qualitative information around lived experience of fuel was also seen as a priority. This could involve working in partnership with those with lived experience, communities, the third sector, academia and across Government.

Partnership working

6.31. Another priority identified was around partnership working and included that the new Advisory Panel should focus on the development of partnerships. Further comments referred specifically to local partnerships and included that there should be a review of powers and resources they require. It was also suggested that the new Advisory Panel should prioritise capacity and skills building within those local partnerships.

6.32. In terms of the membership of these partnerships, suggestions included that they should bring together local public, private and third sector partners working on public health, housing, income support and energy efficient. There was a specific reference to creating links with:

- Local communities.
- Community Planning Partnerships.
- Local delivery organisations across Scotland.
- Social housing providers and their tenants.
- The NHS.
- Human Rights bodies such as the Scottish Human Rights Commission.

6.33. Further comments related to partnership working included that the new Advisory Panel should ensure support and training is available for key local delivery partnerships and partners.

Question 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?

6.34. A total of 51 respondents commented at Question 15a and 46 respondents at 15b. At 15b, some respondents referred back to their comment at 15a. A breakdown of the number of comments received by respondent type is set out in Table 16 below.

6.35. A single analysis of the comments across both questions is presented below.

Table 16: Number of comments by respondent type

Type of respondent	Number of comments at 15a	Number of comments at 15b
Organisations:		
<i>Community or Tenant Group or Federation</i>	2	-
<i>Energy Company</i>	5	5
<i>Health and Social Care</i>	2	2
<i>Housing Association</i>	6	6
<i>Housing Body or Group</i>	1	-
<i>Inter-agency Group or Partnership</i>	4	3
<i>Local Authority</i>	18	18
<i>Other</i>	2	1
<i>Research Group</i>	1	1
<i>Third Sector</i>	8	8
Organisations	48	43
Individuals	2	2
All respondents	51	46

6.36. Of the 51 respondents who commented at Question 15a, a small number noted that they do not have experience of using proxies to identify fuel poor households. However, one of these respondents did note that they have used home visits and detailed interviews as a means of assessment. Other respondents did identify proxies, although it was not always clear that they had direct experience of using them.

General Issues

6.37. Some respondents made broader comments on the use of proxies. These included that current proxies are inadequate and noting that those used

currently tend to be focused on energy inefficiency rather than fuel poverty. A small number of respondents felt that proxies simply do not work. It was suggested that using proxies, assumptions, archetypes and inappropriate statistical techniques does not have any value in targeting fuel poor householders, and actively disadvantages the most vulnerable. However, a small number of respondents disagreed. For example, one suggested that the proxies they use (Scottish Index of Multiple Deprivation (SIMD), Council Tax Bands and Home Analytics database, all set out further below) have worked well and that they would be keen to retain them. Another felt that using proxies to target programmes to all households in a particular area has allowed them to make a significant difference in a local community.

6.38. Other general comments about the use of proxies included that:

- It is important that any proxies used acknowledge that fuel poverty is not the same as income poverty.
- The impact of the use of proxies on the people living in fuel poverty or people who will be identified as such through the use of a specific proxy should be measured and evaluated. Being identified as fuel poor could expose households to stigmatisation if it is not done in a respectful and secure manner.
- Proxy data can often give local authority-level data but not wards or neighbourhood. In particular, it has the potential to miss smaller pockets of fuel poverty, in generally affluent areas.
- Proxy information often needs to be matched up with stock condition information and further refined to provide accurate results.
- Identifying fuel poor households is a particular challenge for local authorities which transferred their housing stock, because information on tenants and properties is no longer held by them.

6.39. Others noted that there are other means to identifying fuel poor households than the use of proxy. For example, a Local Authority respondent noted that a significant number of fuel poor households are identified by frontline staff who are visiting households for other reasons. They went on to suggest that it would be helpful to focus on supporting referrals from a wide range of workers, through training and awareness raising. A Health and Social Care respondent reported that they have worked with Shelter Scotland to customise a Healthy Homes - Fuel Poverty LearnPro module for health and social care staff including those in general practice. This contains a checklist to enable staff to identify fuel poor households.

6.40. Respondents also provided information about how they use proxy information to assess fuel poverty. Examples included:

- Producing Fuel poverty maps to identify households in fuel poverty and apply for funding such as HEEPS. Information is provided by datazone,

enabling direct targeting of communities that are at high risk of fuel poverty.

- Using the Centre for Sustainable Energy's Fuel Poverty Calculator.

6.41. The analysis presented below sets out the proxies identified at 15a in turn. The proxies about which further views were given, in line with Question 15b on how well that proxy works in accurately identifying fuel poor households, are presented first.

6.42. If four or more respondents reported using a particular proxy, the number of respondents has been stated. Please note that some of the comments made about particular proxies were made by respondents who had not reported using those proxies.

6.43. **Council Tax Records** (used by 18 respondents). In particular households eligible for Council Tax Reduction Schemes. It was also noted that Council Tax Banding A-C is used for HEEPS: ABS.

6.44. Positives associated with the use of Council Tax records included:

- It is an efficient and cost-effective method of delivery for area-based programmes.

6.45. Concerns or issues raised about using Council Tax records included:

- Council Tax banding A-C is a poor proxy as many householders in higher bands have inherited properties that are harder to heat because of their size.
- The use of Council Tax Banding A-C does not work well for rural areas as fuel poverty is pepper potted.

6.46. **SIMD data** (used by 16 respondents). Positives associated with the use of SIMD data included:

- It is an efficient and cost-effective method of delivery for area-based programmes.
- It can be used to target face-to-face fuel poverty or energy advice to the most deprived areas.
- It assists to some degree in identifying fuel poor households at a local level.
- If an area is in one of the most deprived data-zones then there is a high probability that, in the thermally inefficient properties targeted, there will be high numbers of fuel poor residents.

6.47. Concerns raised included:

- There is little correlation between the proxy of SIMD Income Domain distribution pattern with that of fuel poverty.

- Place-based measurements, such as SIMD, are not an effective means to capture the experiences of BME communities, as poorer BME households are not as concentrated in rural areas as their white counterparts.

6.48. **SHCS** (used by four respondents). Concerns raised included:

- The samples sizes used to inform the SHCS about the rates of fuel poverty in rural and remote Scotland are so small as to call into question their reliability¹⁶. As with some other national data, it needs to be 'island-proofed'.

6.49. **Receipt of social welfare benefits**, including Housing Benefit (used by seven respondents). These proxies were noted as being used to assess applications under the UK Government's ECO and the Warm Home Discount. Alternatively, it was suggested that receipt of Warm Home Discount rebate was itself a proxy.

6.50. **EST Home Analytics** (used by four respondents). Concerns raised included that the information held within this database is out of date.

6.51. **Heat Mapping**. Concerns raised included that Heat Mapping is modelled data and only applies to broad areas.¹⁷

6.52. **Capped gas households**, identified by heating engineers. This approach was reported as having been very successful.

6.53. **Central heating other than gas or electric**. It was noted that rural areas are more likely to have central heating or fuel types other than gas or electric, such as oil, liquefied petroleum gas and solid fuel, meaning this proxy has a rural focus.

6.54. **Electric heating**. It was suggested that a reasonably successful proxy is that of electric storage heating (or warm air) in buildings with poor thermal performance.

6.55. **Information provided by other agencies**, such as the local Citizens Advice Bureaux. The examples given included being a low income or workless household and being homeless or threatened with homelessness.

6.56. Other data or information sources which respondents reported as using as a proxy included:

- Local Authority Regeneration Areas.
- Local House Condition Survey Information.

¹⁶ The SHCS is designed to produce nationally representative estimates of key statistics annually, and local authority representative estimates by combining data over a three-year period.

¹⁷ Scotland's Heat Map can be found at: <http://www.gov.scot/Topics/Business-Industry/Energy/Energy-sources/19185/Heat/HeatMap>

- EPC rating (used by five respondents).
- Scottish Housing Quality Standard data.
- Thermal properties of housing.
- House type, for example croft houses.
- Weather exposure.
- Properties with off-gas grid.
- CACI data.
- Fuel Poverty maps (which can be accessed from the Scottish Government's website).
- Evidence from the Home Energy Efficiency Database (HEED).
- Fuel costs, including high, unaffordable fuel costs.
- Fuel debt.
- Self-disconnection or heating not being used.
- Rent arrears.
- Eligibility for Tax Credits
- Eligibility for Free School Meals or Clothing Grant Awards.
- Income Levels.
- Financial Health Check Service information.
- Households falling into Energy Company Obligation (ECO) categories.

Other possible proxies, data sources or approaches

6.57. Other comments suggested possible proxies or other information or data which could be used to identify fuel poor households. These included:

- Cold Weather Payments, as a useful proxy for those at risk of fuel poverty because of low incomes.
- Electric heating, as an indicator of higher energy costs.
- For rural areas, off-gas grid and in particular off-gas grid in remote rural areas and islands.
- For urban areas Council Tax Band A-C and off-gas grid heating systems.
- In-depth stock and household surveys at a local authority level. One Local Authority respondent reported that they are developing a housing database which will monitor stock improvements across the private and social sector.
- EPC ratings from Home Information Packs.
- Energy usage data, such as higher or unexpectedly lower than average consumption levels.

- Household composition and circumstances, such as being older, unemployed, in receipt of benefits, having a health condition, having rent arrears, being in fuel debt etc.

6.58. Sources for information that could be used as a proxy included:

- The Property Services Register.
- Mapping tools that use postcode level data, such as Acorn or Mosaic.

6.59. Other possible approaches outlined included:

- The use of a Statement of Intent for ECO-Flex. Specifically, empowering trusted partners to make presentations of householders for ECO-Flex declarations.
- Creating dynamic digital templates that pre-populate criteria for a household.

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?

6.60. A total of 39 respondents commented at Question 16. A breakdown of the number of comments received by respondent type is set out in Table 17 below.

Table 17: Number of comments by respondent type

Type of respondent	Number of comments
Organisations:	
<i>Community or Tenant Group or Federation</i>	2
<i>Energy Company</i>	2
<i>Health and Social Care</i>	-
<i>Housing Association</i>	4
<i>Housing Body or Group</i>	-
<i>Inter-agency Group or Partnership</i>	3
<i>Local Authority</i>	13
<i>Other</i>	2
<i>Research Group</i>	1
<i>Third Sector</i>	8
Organisations	35
Individuals	4
All respondents	39

- 6.61. A number of the comments made broader observations about the use of door-to-door assessments. Although a small number felt that area-based approaches or the use of proxies is not a good way forward, around 1 in 8 of those who answered the question suggested the door-to-door approach is an effective, if resource intensive, way of gathering accurate information. It was also suggested that when the area-based approach is being used, the use of proxies works well or is a must.
- 6.62. Some respondents highlighted the challenges associated with using the door-to-door approach, including that householders, and particularly older people, can be suspicious of those coming to their door and may in any case be reluctant to share detailed income and fuel use information. It was suggested that a sensitive approach from a known individual is key, and that using local and trusted third parties can be effective in building effective community relationships and delivering successful energy efficiency and fuel poverty programmes.
- 6.63. Other key lessons focused on the gathering of information or the sharing of advice. Points raised by respondents included that:
- The in-person, face-to-face approach is effective, because it is most likely to lead to real change. An example given was being able to show someone how to adjust their storage heater dials.
 - It is important not to over burden the household with too many questions or multiple visits by different partners and companies monitoring the output. Also, any approach should draw on information which householders can supply easily.
 - People in debt can be reluctant to divulge income information and there could be problems if any tool requires accurate income information to be effective.
 - It is important that an assessor is able to provide the householder with advice and information about the proposed energy efficiency measures. For example, they need to be fully aware of how the possible funding works and how different households may have access to different pots of funding.
 - The introduction of the DWP data matching service managed by EST has worked extremely well. The householder has to agree to basic data including name, address and date of birth being given to DWP who will then declare a match if the householder is in receipt of eligible income-related benefits. This service should be included in any door-to-door approach undertaken in the future.
 - The rollout of Universal Credit may lead to significant confusion and lead to erroneous results or decisions around referral or entitlement to support.
- 6.64. Other comments related to the proxies being used and included:

- Given the new definition and revised approach, it would seem reasonable to take the draft outcomes in turn and examine what proxies might follow from them.
- Some proxies may be more effective than others. It will be important that any assessment takes account of the potential for individuals to have different expectations around what is affordable and whether they need financial support.

6.65. There were suggestions as to how on-the-ground assessment approach could be supported or better targeted, including:

- The process, and particularly the qualification criteria, can be confusing for householders. It would be helpful to have an easy to use definition of fuel poverty and clear eligibility criteria to ensure that there are no grey areas for householders.
- Proxies work best in projects with a degree of flexibility around the proxy and when used in conjunction with on the ground data provided by clients or by other local support organisations.
- The roll out of smart meters could provide a useful additional means of identifying vulnerable households.

6.66. There was also reference to the Low Income/High Costs assessment tool developed in England and it was suggested that the development of a practical and potentially highly accurate assessment tool for targeting and monitoring fuel poverty in local areas and on the 'doorstep' would be welcome.

6.67. There were also more general suggestions around working across communities to tackle fuel poverty. A town centre - based Energy Advice Centre was highlighted as providing a permanent hub for local residents to access support. Drop-in style Energy surgeries were also suggested.

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

6.68. A total of 56 respondents commented at Question 17. A breakdown of the number of comments received by respondent type is set out in Table 18 below.

Table 18: Number of comments by respondent type

Type of respondent	Number of comments
Organisations:	
<i>Community or Tenant Group or Federation</i>	2
<i>Energy Company</i>	2
<i>Health and Social Care</i>	3
<i>Housing Association</i>	8
<i>Housing Body or Group</i>	1
<i>Inter-agency Group or Partnership</i>	4
<i>Local Authority</i>	19
<i>Other</i>	2
<i>Research Group</i>	1
<i>Third Sector</i>	9
Organisations	51
Individuals	5
All respondents	56

6.69. A number of respondents made broader comments about the use of doorstep tools for area-based schemes, including highlighting the significant achievements of area-based schemes across Scotland. There was also support for the development of a tool which allows for easy identification of fuel poor households. However, others (around 1 in 6 of those answering the question) raised significant reservations. Concerns included that it would, or may not be, well received by householders and by vulnerable householders in particular. There were also concerns about privacy and confidentiality.

6.70. Other concerns raised centred around a perceived focus on door-to-door to the exclusion of other approaches. These concerns stemmed from seeing it as a fabric only approach which has been the mainstay of existing projects which have failed to eliminate fuel poverty to date.

Resources

6.71. Other concerns or comments focused on the level of resources that would be required to use any doorstep tool. One Local Authority respondent reported that they have considerable experience in delivering complex schemes bringing together partners and complicated funding packages and felt with some certainty that door to door calling will be detrimental to the delivery of area-based schemes in their area. Respondents also suggested that door-to-door approaches are resource intensive and make this type of tool potentially difficult to sustain for many Councils and local partners.

6.72. A specific suggestion was that organisations such as HES could be geared up to ask early questions about fuel poverty.

Assessment tools

- 6.73. On current household assessment tools, it was reported that delivery bodies generally use versions of the reduced dataset Standard Assessment Procedure (rdSAP) form. The Research Group respondent highlighting this issue went on to comment that the extensive limitations of rdSAP and its parent assessment (SAP) are well-known and that the use of proxies and assumptions in these tools is their most significant limitation.
- 6.74. Moving forward, around 1 in of 8 respondents who answered the question commented on possible issues around any new tool, including that it is difficult to comment on its value without knowing how it will be constructed and what it will be used for.
- 6.75. Points highlighted as to be considered when developing any new doorstep tool included that:
- It will be difficult to develop a tool which combines the comprehensive range of questions required to yield the most meaningful information, but which can be completed quickly.
 - The quality and format of locally-held data may be variable.
 - Accessing reliable data on income may be challenging.
- 6.76. Comments on how any new tool should be framed included:
- It will need to be straightforward and user friendly. One suggestion was adopting a standardised digital format suitable for completion on a tablet computer. However, there were also concerns about the use of a mobile tool to collate data on the doorstep. It was suggested that this has data protection implications for the storage and handling of data and for the security of the data if the device were to be lost.
 - It may need to be customised at a local level. However, it was also suggested that consistency would be key; the tool would need to be flexible enough to take local circumstances into account, but at the same time would need to be based on a central system to ensure monitoring is possible.
 - It will be important to consider how the tool can be designed and implemented in such a way as to minimise stigmatising households.
- 6.77. In terms of specific content or features of the tool, suggestions included:
- It should also be a practical referral tool to other local support partners as well as to HES support. It will also need to include regional/area-based data on all services available in the area.
 - There needs to be enough flexibility in the tool, or the system, to support re-assessment of fuel poverty status over the project period of an area-based scheme.

- Open questions about whether people are struggling might be more effective than a focus on detail and figures.
- It could be used to identify different, universally available support mechanisms most of use to individual consumers, such as advice on tariffs, a benefits check, or on use of heating controls.

Use of any doorstep tool

6.78. Respondents also made a range of comments about the rollout or use of the doorstep tool including that:

- It will be important to undertake work to alleviate residents' anxieties about doorstep-based approaches.¹⁸
- Users would require significant training and guidance.
- Clarity is needed around how the information gathered is collated and shared with relevant partners. One suggestion was that data should be fed into a central coordinating agency. It was suggested that HES could take on that role.
- It would be helpful if the tool was made available for residents to determine if they are fuel poor, with a referral system also put in place.

Alternative approaches

6.79. A small number of respondents commented on the overall approach which could or should be taken and generally suggested that a mixed or dual approach should be taken. A specific suggestion was for a universal approach for area-based schemes running alongside referral-based schemes which can be more targeted.

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?

6.80. A total of 46 respondents commented at Question 18. A breakdown of the number of comments received by respondent type is set out in Table 19 below.

¹⁸ The assessment tool would be used by frontline workers to assess whether someone is in fuel poverty. It is not designed to be used as part of any cold calling-based approach.

Table 19: Number of comments by respondent type

Type of respondent	Number of comments
Organisations:	
<i>Community or Tenant Group or Federation</i>	1
<i>Energy Company</i>	2
<i>Health and Social Care</i>	2
<i>Housing Association</i>	8
<i>Housing Body or Group</i>	-
<i>Inter-agency Group or Partnership</i>	4
<i>Local Authority</i>	18
<i>Other</i>	1
<i>Research Group</i>	1
<i>Third Sector</i>	5
Organisations	42
Individuals	4
All respondents	46

Appropriateness of using SHCS data

6.81. Not all respondents agreed that there should be a focus on reporting on overall fuel poverty levels as part of the SHCS, with a small number suggesting that fuel poverty may not be best located within the SHCS. A particular concern was that the SHCS's focus on the built environment may detract from the person-centred approach to tackling fuel poverty which is required.

6.82. A number of the other comments referred to issues already covered at earlier questions, including that the SHCS is based on a very small sample size, and a perceived need among a small number of respondents to improve the robustness of SHCS data for rural areas. Ensuring that the data collection side of SHCS is accurate and reliable at Community Planning Partnership (CPP) and local authority level was also suggested.

Use of the SHCS data

6.83. Respondents made a number of suggestions as to how SHCS could be made of greater value to CPPs and others in assessing fuel poverty. On a broader point, a Local Authority respondent suggested that the Scottish Fuel Poverty Partnership Forum could liaise with representatives from all local authority CPP's to find a commonly accepted method of sharing data and reporting effectively to enhance the findings of the SHCS.

6.84. Other suggestions as to how the Scottish Government could make an effective intervention included explaining how the local authority results have been developed.

6.85. In terms of how respondents thought the SHCS data could be made more useful or robust, suggestions included:

- Utilising local data such as data from local delivery organisations or that has been used to create Locality Plans to supplement the SHCS information. This was suggested with particular reference to rural and island communities.
- Combining the Home Analytics data with other along with data already collected.

6.86. A specific idea was that smart meter data could be used to inform future SHCS work. The Local Authority respondent making this suggestion thought this would enable a better understanding of how fuel poor households use energy. In particular, it was felt that this information could be used in conjunction with data available on income, fuel costs and property condition / energy efficiency measures, to ascertain the extent to which fuel poverty is attributable to household behaviours. The Scottish Government was seen as best placed to work with the range of organisations, including energy providers, who would need to be involved.

Other data and reporting issues

6.87. Other respondents raised wider issues and were looking for Scottish Government support around monitoring of progress towards eliminating fuel poverty. It was suggested that the Scottish Government should work with CPPs to utilise existing reporting structures and data sets where possible. The reporting mechanism should be proportionate, fit for purpose and prevent duplication of effort where ever possible. It was also suggested that a more regular fuel poverty reporting process should be put in place.

6.88. Specific issues raised included:

- Changes in the fuel poverty energy modelling as a result of the Warm Homes Discount and changes to fuel prices has meant it is not possible to make direct comparisons between set time-periods. It would be helpful if this could be addressed.
- Consideration could be given to the potential of fuel poverty mapping to be incorporated into SIMD statistics.

6.89. Finally, it was noted that that BME voices are often left out of formal planning structures, including CPPs, and it was suggested that work to report on overall fuel poverty levels should seek to engage BME and other under-represented groups to ensure they are not missing from the monitoring and planning.

Policy and practice support

6.90. Beyond data specific issues, a number of respondents also highlighted other areas of policy or practice in which they felt the Scottish Government could offer support to CPPs. These included working to ensure that fuel poverty is

properly prioritised by CPPs and effectively linked to other service delivery activity.

- 6.91. It was suggested that it would be useful to having a fixed timetable for reporting on fuel poverty and delivery plans would help CPPs with their work planning. Moving forward, it was suggested that each CPP is able to enter into discussions about a more focused and regular timetable (if required) to take account of local circumstances.
- 6.92. A specific suggestion was that the Scottish Government should develop or endorse best practice as a means to encouraging CPP partners to recognise fuel poverty as a priority. One Local Authority respondent noted that Local CPPs (LCPPs)¹⁹ have a crucial role to play and that, in their area, local reports on key issues are compiled and made available to the LCPPs. They suggested that a similar approach could be considered in relation to fuel poverty. It was also suggested that Local Outcome Improvement Plans should contain specific actions around fuel poverty and the Scottish Government should support Councils and their partners in this effort.
- 6.93. Otherwise, a range of areas in which the Scottish Government might offer support to CPPs. These included:
- Supporting the development of an effective national network of referral pathways between CPPs and HES.
 - Providing support to CPPs in how they could best incorporate fuel poverty outcomes into their statutory Local Outcomes Improvement Plans.
 - Supporting an understanding of the social and financial impacts of fuel poverty across a wide range of services and partners. Specifically, developing a Social Return on Investment assessment of fuel poverty related activity.
 - Providing advice and guidance on how to monitor the impact of fuel poverty related activity.
 - Providing additional support and guidance for rural local authorities which takes cognisance of the unique rural dimension of fuel poverty.

Remit of and working with CPPs

- 6.94. The role of CPPs in tackling fuel poverty was highlighted. In particular, it was noted that CPPs have a duty to plan and deliver local outcomes with a specific focus on tackling inequalities. It was suggested that fuel poverty targets should be included with Community Plans and Single Outcome Agreement.

¹⁹ The Community Empowerment (Scotland) Act 2015 place specific duties on CPPs and their partners at a “locality” level, i.e. smaller areas within a CPP region – some refer to these as LCPPs, others use terms such as “locality partnerships”.

7. Outcomes and principles

Summary of Questions 19 to 21

- Many respondents made a statement of support for taking an outcomes-focused approach, including because it would shift the focus onto the impact on people rather than properties.
- Gathering qualitative feedback on the impact that fuel poverty or energy efficiency measures have had on individual households was seen as challenging.
- A number of respondents agreed that the outcome-focused approach would encourage national and local policy and delivery partners to work together effectively.
- Many also agreed that the principles detailed in the 3 bullet points are adequately reflected in the outcomes framework. However, there were concerns that the needs of rural and island communities are not clearly acknowledged.
- A majority of respondents, 72% of those answering the question, thought the proposed framework would help to strengthen partnerships on-the-ground.

7.1. Section 7 of the Consultation Paper looked at outcomes and principles. It noted that the aims remain true to those that were identified in the 2012 Fuel Poverty Evidence Review and that the following principles will underpin the approach:

- The Fuel Poverty Strategy will be firmly based on the principle of social justice and creating a fairer and more equal society, irrespective of whether individuals live in urban or rural Scotland;
- The Scottish Government's approach to fuel poverty eradication will be set on a statutory framework, measured and overseen by Ministers and delivered via partnership structures at a local level. Building on the assets of individuals and communities will be at the heart of this partnership and early intervention and prevention will be crucial to success; and
- The needs of individuals and families will be at the heart of service design and delivery and the Fuel Poverty Strategy will address all four drivers of fuel poverty: income, energy costs, energy performance, and how energy is used in the home.

7.2. The Consultation Paper also noted that developing an outcomes framework for fuel poverty is designed to enable Scottish Government and its partners to adopt a shared understanding of what needs to be achieved for those who are in, or at risk of falling into, fuel poverty.

Question 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?**

7.3. A total of 64 respondents commented at Question 19 and 50 respondents at Question 19a although around 1 in 3 simply referred back to the previous question. A breakdown of the number of comments received by respondent type is set out in Table 20 below.

Table 20: Number of comments by respondent type

Type of respondent	Number of comments at 19	Number of comments at 19a
Organisations:		
<i>Community or Tenant Group or Federation</i>	1	1
<i>Energy Company</i>	3	3
<i>Health and Social Care</i>	3	2
<i>Housing Association</i>	8	5
<i>Housing Body or Group</i>	3	1
<i>Inter-agency Group or Partnership</i>	4	3
<i>Local Authority</i>	21	17
<i>Other</i>	4	2
<i>Research Group</i>	2	2
<i>Third Sector</i>	11	9
Organisations	60	45
Individuals	4	5
All respondents	64	50

7.4. Around 1 in 2 of respondents who answered the question began their comments with a statement of support for taking an outcomes-focused approach. Strengths and positive impacts anticipated as stemming from taking an outcomes focused approach in the field of fuel poverty included:

- It would shift the focus away from properties, numbers of energy efficiency measures installed, or funding invested and onto impact on people and specifically on to people who need support the most. This point was made by around 1 in 6 of those who answered the question.
- It can be beneficial if partner bodies are aware of the impact their own actions and activities can have on end users, and how these activities relate to those of other agencies.

Challenges for outcome focused approaches

- 7.5. Respondents also noted some of the challenges inherent in any outcome-focused approach or in taking an outcome-focused approach in this policy area. Comments included that:
- The main challenge is to agree what the outcomes are and who is responsible for them. Taking an inclusive approach to this work would be helpful.
 - Monitoring outcomes is not always achievable within the time frame of shorter term projects.
 - An outcomes-based approach can only work if programmes are longer term to allow for improved collaboration with all stakeholders to ensure funding is targeted in the correct places.
 - The approach should not only focus on the outcomes but also the actions, processes and resources required to deliver these.
 - Gathering qualitative feedback on the impact that fuel poverty or energy efficiency measures have had on individual households may be a challenge.
 - It can be a resource heavy approach. There was a request that any additional requirements, such as additional qualitative monitoring or research, should be adequately funded.

The overall approach

- 7.6. Other comments highlighted what respondents would be looking for in terms of the outcomes focused approach and included that:
- It is important not to mandate a top-down approach but to work with smaller organisations to ensure that their expertise and local voice is heard at every stage.
 - It would be helpful for the outcomes to be included as part of the reporting criteria for partners, ideally with detailed activities disaggregated.
 - It will be important to assess, adequately acknowledge, respect and meet the variety of needs of people with, or who share protected characteristics.
 - The plan and process should be SMART²⁰ tested.
- 7.7. In terms of how progress should be measured, comments included that:
- Measuring progress against a baseline figure for fuel poverty will be key.
 - It will be important to use actual data and the experiences of those receiving support and is not entirely reliant on modelled data.

²⁰ SMART is an acronym often used in relation to objective setting and strategic planning. It generally stands for: **S**pecific, **M**easurable, **A**chievable; **R**elevant; **T**ime related.

- The new Advisory Panel may wish to develop means of keeping contact with, and gathering qualitative information from, local delivery organisations across Scotland.
- A level of quantitative measurement should be retained.
- The work of HES relating to fuel poverty should be integrated in to the outcomes-focused approach.

7.8. On the outcomes themselves, and how the approach should be set out within the Strategy, comments included that:

- It would be helpful to have local outcomes as well as national ones. Localised plans were also suggested. However, it was also suggested that local outcomes can only be guaranteed if the Scottish Government adopts a grant-based approach to supporting locally-based and trusted organisations of quality services.
- The Strategy should set out the anticipated impacts and expected sources of funding for individual programmes or actions.
- There should be clarity around which parts of the policies, plans and strategies will contribute towards the intermediate and long-term outcomes.
- The Scottish Government must specify timely reporting of both outputs and outcomes.

7.9. There were also comments about how the outcome-focused approach would work in practice. These included:

- Further information on the reporting requirements for organisations would be welcome.
- Guidance should be provided which sets out a consistent approach on how and what organisations should be reporting.

Other issues

7.10. Other respondents suggested other outcomes which they would wish to see included. Suggestions were:

- Healthcare impact on both those receiving support and on the wider healthcare system.
- Eradication of the disparate rate of fuel poverty that BME groups and some other equalities groups face.

7.11. A small number of respondents did not agree with the focus on outcomes. It was suggested that delivering strategy objectives would be more achievable if there was a focus on key indicators as opposed to being outcomes focused.

Effective joint-working

- 7.12. At Question 19a, a number of respondents (around 1 in 8 of those answering the question) simply agreed that the outcome-focused approach would encourage national and local policy and delivery partners to work together effectively. Further comments included that it will support a collective vision that all partners can share. It was also suggested that it will help foster more closely aligned and successful partnership activity and will encourage national and local policy and delivery partners to work together effectively.
- 7.13. It was also noted that the high-level outcomes are consistent with, and seek to achieve broadly similar aims as, the National Health and Wellbeing outcomes for Health and Social Care Partnerships and CPP Local Improvement Outcomes. The importance of seeing fuel poverty as not only a housing issue was also highlighted, and it was also suggested that the Strategy should be linked to relevant existing work and plans, such as that being done in the field of Public Health.
- 7.14. Some respondents cited certain conditions or circumstances which they felt needed to be in place to support effective joint-working. These included that:
- Local delivery organisations are consulted on the best approaches to delivery of outcomes.
 - Partners are provided with clear guidance and support on how to report against an outcome-based framework.
 - The capacity of the local delivery organisations is built.
- 7.15. Other suggestions as to how partners could be encouraged to work together included that with clear sections for different stakeholders within the Strategy can be more easily translated into actions that are achieved collaboratively.
- 7.16. Further comments included that the UK Collaborative Centre for Housing Evidence (CaCHE)²¹ could work with a group of frontline fuel poverty alleviation practitioners to draw up a realistic list of the outcome measures required.

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

- 7.17. A total of 60 respondents commented at Question 20. A breakdown of the number of comments received by respondent type is set out in Table 21 below.

²¹ CaCHE is an independent, multi-disciplinary and multi-sector consortium of 13 academic and non-academic partners led by the University of Glasgow. CaCHE is UK-wide in coverage (across all four nations and at different spatial scales within), as well as UK-level in focus. Over the course of the five-year programme it will advance knowledge and improve the evidence base for both housing policy and practice in all parts of the UK.

Table 21: Number of comments by respondent type

Type of respondent	Number of comments
Organisations:	
<i>Community or Tenant Group or Federation</i>	2
<i>Energy Company</i>	2
<i>Health and Social Care</i>	3
<i>Housing Association</i>	7
<i>Housing Body or Group</i>	2
<i>Inter-agency Group or Partnership</i>	4
<i>Local Authority</i>	20
<i>Other</i>	3
<i>Research Group</i>	2
<i>Third Sector</i>	11
Organisations	56
Individuals	4
All respondents	60

7.18. Around 1 in 3 of respondents who answered the question agreed that the principles detailed in the 3 bullet points are adequately reflected in the outcomes framework.

7.19. Other respondents made general comments about the overall approach as set out within the Consultation Paper, including how the principles should be reflected in the outcomes framework. These comments included that:

- The principles could be more prominently reflected in the framework
- Both the principles and outcomes framework should be reviewed once a detailed plan is prepared.
- More detail is required, including in relation to the policies, programmes and resources that are expected to deliver the three principles. An example given was how the proposed policy to introduce minimum standards of energy performance in the private rented sector and to consult on standards and incentives in the owner-occupied sector will be delivered.
- The Health and Social Care Strategic Plan should be referenced.

7.20. Around 1 in 9 of those who answered the question made comments about the overall approach as expressed through the three principles. Comments tended to focus on areas which were not seen as being given sufficient coverage within the three principles. As at previous questions, the needs of rural and island communities were argued not clearly acknowledged and taken into account. There was a specific suggestion that the Scottish

Government should commit to the principle of giving rural communities as much opportunity and practical support as possible to develop and control their own, renewable-based projects. It was also suggested that 'Island Proofing' and 'Our islands, Our Future' should be included in the 'Influential policies and programmes' section.

7.21. Comments highlighting other issues which respondents thought should be covered included:

- The core human rights principles of accountability and participation are weak.
- The three principles fail to acknowledge the importance of the impact of fuel poverty on people with, or who share protected characteristics. In particular it was suggested that age, long-term health conditions and disability have not been recognised sufficiently.
- There should be a stronger focus on targeting inequality.
- There is currently no acknowledgement of the right to an adequate standard of living, the right to housing, the right to food or the right to health within the policy objectives. It was suggested that it will not be possible to realise these rights without taking a rights-based approach to fuel poverty.
- Support and capacity building of local partnerships could be covered.
- The roles of local, community and individual assets are largely missing from the framework.

7.22. There was also a concern that the aim to ensure that dwellings occupied by fuel poor households have lower carbon emissions may cause some conflict as under current circumstances low-carbon fuels will not necessarily be the most cost-effective for fuel poor households. A fundamental concern was that the proposed definition of fuel poverty (as covered at Question 1) will lead to failure to adhere to or meet the three principles.

7.23. Other comments addressed one of the three principles themselves. Each of the three principles is set out in turn below along with analysis of the comments made.

The fuel poverty strategy will be firmly based on the principle of social justice and creating a fairer and more equal society, irrespective of whether individuals live in urban or rural Scotland.

7.24. Comments included that the first principle is not adequately reflected in the outcomes framework because:

- The outcomes are almost all targeted at low income households. If (as discussed at Question 1) 'low income' is determined by the UK MIS and AHC then inequality felt by island communities is not being addressed.

- The focus appears to be on the gathering of statistical information and property condition rather than a focus on outcomes for people.

7.25. Other comments included that one of the important dimensions of equality and fairness is tenure-neutrality and that private sector tenants in particular can be at a disadvantage both in terms of suffering fuel poverty and being less able to respond to it. A fuller consideration and statement of Fuel Poverty Strategy and the private rented sector was suggested.

7.26. It was also suggested that sustainability should be embedded in the first principle, alongside social justice, particularly in light of increasingly ambitious climate change goals. It was proposed that the first principle be amended to read 'The fuel poverty strategy will be firmly based on the principles of social justice and sustainability and creating a fairer and more equal society, irrespective of whether individuals live in urban or rural Scotland'.

The Scottish Government's approach to fuel poverty eradication will be set on a statutory framework, measured and overseen by Ministers and delivered via partnership structures at a local level. Building on the assets of individuals and communities will be at the heart of this partnership and early intervention and prevention will be crucial to success.

7.27. Comments included that it is vital that areas, and particularly islands, are allowed the flexibility to develop a partnership that suits their local context and the unique issues they face. It was also noted that there is no mention of Community Planning Partnerships having ownership of this agenda, or of embedding fuel poverty targets in their Local Outcomes Improvement Plan.

7.28. Other comments were that:

- The second principle is not adequately reflected in the national strategy.
- The emphasis on early intervention and prevention would justify ensuring that householders are socially well-connected and supported.

The needs of individuals and families will be at the heart of service design and delivery and the fuel poverty strategy will address all four drivers of fuel poverty: income, energy costs, energy performance, and how energy is used in the home.

7.29. Comments made included noting the difference between a 'needs based' approach and a 'rights based' approach and it was suggested that the latter recognises the Scottish Government's obligations to ensure people's human rights are met. It was also suggested that participation is the cornerstone of a human rights-based approach but that there is no reference to how people who understand and have experienced fuel poverty will be able to guide the Strategy or hold the Government and other public authorities to account in the event of failure. On a similar theme, there was a call for the Scottish Government to clarify what level of support it will provide to people living in fuel poverty in order to be involved in the design and delivery of support and services.

7.30. Other comments included that:

- The fourth driver, 'how energy is used in the home' is a narrow interpretation of the factor of 'occupant behaviour'. Putting the needs of individuals and families at the heart of service design should embrace the social dimensions of fuel poverty.
- The Strategy places more emphasis on energy performance than the other three drivers of fuel poverty.
- The correct intervention for taking some households out of fuel poverty may sometimes result in increased carbon emissions.
- There needs to be enough flexibility and recognition that delivery of services in rural areas will often be more labour intensive and time-consuming than in urban areas.
- A clause could be added to take into account the needs of future generations.

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

a) If so, how?

b) If not, why?

7.31. Responses to Question 21 by respondent type are set out in Table 22 below.

Table 22: Response by Respondent type

Type of respondent	Yes	No	Not answered	Total
Organisations:				
<i>Community or Tenant Group or Federation</i>	2		2	4
<i>Energy Company</i>		1	5	6
<i>Health and Social Care</i>	2		3	5
<i>Housing Association</i>	2	1	5	8
<i>Housing Body or Group</i>			3	3
<i>Inter-agency Group or Partnership</i>	1		4	5
<i>Local Authority</i>	11	4	6	21
<i>Other</i>	1	1	5	7
<i>Research Group</i>		1	1	2
<i>Third Sector</i>	2	1	16	19
Total organisations	21	9	50	80
% of organisations answering	70%	30%		
Individuals	2		9	11
% of individuals answering	100%	0%		
All respondents	23	9	59	91
% of all respondents	25%	10%	65%	
% of all those answering	72%	28%		

7.32. A majority of respondents, 72% of those answering the question, thought the proposed framework would help to strengthen partnerships on-the-ground.

7.33. A total of 36 respondents commented at Question 21a and 20 respondents at Question 21b. Please note that some of those who commented (primarily at 21a) had not answered the closed question. A breakdown of the number of comments received by respondent type is set out in Table 23 below.

Table 23: Number of comments by respondent type

Type of respondent	Number of comments at 21a	Number of comments at 21b
Organisations:		
<i>Community or Tenant Group or Federation</i>	2	
<i>Energy Company</i>	1	2
<i>Health and Social Care</i>	3	
<i>Housing Association</i>	4	4
<i>Housing Body or Group</i>		
<i>Inter-agency Group or Partnership</i>	3	2
<i>Local Authority</i>	16	7
<i>Other</i>	1	1
<i>Research Group</i>		1
<i>Third Sector</i>	4	2
Organisations	34	19
Individuals	2	1
All respondents	36	20

7.34. Those who thought the proposed framework would help to strengthen partnerships on the ground, most frequently pointed to the importance of working collaboratively to tackle fuel poverty. This was raised by around 1 in 7 of those who commented. Respondents also pointed to the importance of fuel poverty being established as a clear priority for the partnerships and the organisations they work with, (raised by around 1 in 9 of those who commented) and to all those involved understanding how they and others can contribute towards achieving shared outcomes. It was also suggested that the framework could help strengthen links between key services and support referrals to the national delivery schemes and to the other support networks available.

7.35. Otherwise, around 1 in 9 respondents who commented noted some of the conditions they believed would need to be in place for the collaborative approach to work successfully, including the availability of sufficient funding. It was also suggested that political buy-in and leadership from the top of local authorities will be as important, if not more important than the framework.

7.36. In terms of the framework itself it was suggested that it needs to be transparent and simple, that a simplified framework for local areas would be required and that local partners should be involved in further development of the framework.

7.37. Those who did not think the proposed framework would help to strengthen partnerships on the ground, and some respondents who did not answer the closed question, sometimes suggested that the framework needs to be

developed further or needs to be clearer, including in relation to the connections.

- 7.38. Otherwise there was a question as to why the Scottish Government is focusing on partnerships and an associated concern that this focus risks placing additional operational demands disproportionately on the many small and under-resourced organisations who are doing valuable jobs in tackling fuel poverty.
- 7.39. On the framework itself, comments included that it needs to have clearer objectives and provide clarification on individual roles and responsibilities, funding, monitoring and evaluation and community participation. It was also suggested that the framework should set out statutory targets for local authorities and that it should refer to CPPs having ownership of resolving fuel poverty and the importance of embedding fuel poverty targets in Local Outcomes Improvement Plans.

8. Assessing impacts

Summary of Questions 22 to 24

- A majority (59%) thought the proposals would have a positive impact for people with protected characteristics, including by targeting those most in need.
- However, there was a concern that the proposed definition of fuel poverty does not properly recognise the issues faced by rural and island communities. It was noted that there is a higher proportion of older people in many rural and island communities.
- The proposal that MIS thresholds will not be adjusted for households where at least one member is long-term sick or disabled was seen as having the potential to have a negative impact on people with a disability.
- In terms of implications for delivery organisations, local authority respondents were amongst those who pointed to the need for additional funding.
- Opportunities for business development and job creation were identified as potential benefits.
- A majority (65%) thought there would be a positive impact for children's rights, most frequently because any initiative to reduce inequalities or target fuel poverty in households with children is welcome.

8.1. In Section 8 the consultation paper explains the assessments being carried out to evaluate the impact of implementing the proposals. It asks for respondents' views on impacts in three areas – Equality, Business and Regulatory, and Children's Rights. The Equality Impact Assessment (EQIA) will help to understand policy impacts on people because of their age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, or sex and sexual orientation.

Question 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?

8.2. Responses to Question 22 by respondent type are set out in Table 24 below.

Table 24: Responses by respondent type

Type of respondent	Positive Impact	Negative Impact	No Impact	Not answered	Total
Organisations:					
<i>Community or Tenant Group or Federation</i>	3			1	4
<i>Energy Company</i>				6	6
<i>Health and Social Care</i>	1	1		3	5
<i>Housing Association</i>	1	4		3	8
<i>Housing Body or Group</i>	1	1		1	3
<i>Inter-agency Group or Partnership</i>	2	1		2	5
<i>Local Authority</i>	11	1	2	7	21
<i>Other</i>		1	1	5	7
<i>Research Group</i>		1		1	2
<i>Third Sector</i>	3	2	1	13	19
Total organisations	22	12	4	42	80
% of organisations answering	58%	32%	11%		
Individuals					
Individuals	2	1	0	8	11
% of individuals answering	67%	33%	0%		
All respondents	24	13	4	50	91
% of all respondents	26%	14%	4%	55%	
% of all those answering	59%	32%	10%		

Figures do not sum to 100% due to rounding

- 8.3. Of respondents who answered the question, 59% suggested there would be a positive impact for people with protected characteristics, while 32% thought impacts would be negative and 10% did not foresee any impacts.
- 8.4. A total of 56 respondents provided an additional comment, with a breakdown of the number of comments by respondent type is set out in Table 25 below.

Table 25: Number of comments by respondent type

Type of respondent	Number of comments
Organisations:	
<i>Community or Tenant Group or Federation</i>	2
<i>Energy Company</i>	2
<i>Health and Social Care</i>	4
<i>Housing Association</i>	6
<i>Housing Body or Group</i>	2
<i>Inter-agency Group or Partnership</i>	5
<i>Local Authority</i>	19
<i>Other</i>	5
<i>Research Group</i>	1
<i>Third Sector</i>	7
Organisations	53
Individuals	3
All respondents	56

- 8.5. Respondents who took a generally positive view of the impacts of the proposals (around 1 in 5 of those who commented) suggested benefits would include reducing inequality, targeting those most in need and making fuel poverty a priority. However, some concerns about the outcomes in rural and island areas and the effect of raising the age threshold were also expressed.
- 8.6. Respondents taking a generally negative view (around 1 in 5 of those who commented) often referred to their fundamental concerns that the proposed definition of fuel poverty does not properly recognise the issues faced by rural and island communities.
- 8.7. A small number of respondents suggested they were unable to judge the likely impacts of the proposals because of a lack of information on delivery mechanisms or over-reliance on proxy data and statistics.
- 8.8. Other general points included alternative assessments that could or should be carried out including:
- A full Equalities Impact Assessment.
 - An integrated Health Inequalities Impact Assessment (HIIA). Incorporating health, equality and human rights impact assessments, this was suggested to be valuable in assessing the potential to reduce health inequalities.
 - An Equality and Human Rights Impact Assessment. Development of both qualitative and quantitative means of identifying impacts was suggested to be a key priority for the implementation of the Strategy.

- 8.9. The importance of outreach work to connect with equalities groups and help them engage with services was also highlighted. It was noted that those who find it most difficult to afford their fuel bills may be unlikely to seek help to reduce their costs and that ensuring equality for this group should be at the heart of the Strategy.
- 8.10. Collection of equalities information as a core element in the monitoring process was also suggested to be important, as was involvement of organisations representing equalities groups in the design, delivery and evaluation of the programme.
- 8.11. Attention was also drawn to the Scottish Government's 2015 report 'Review of Equality Evidence in Rural Scotland', with a suggestion that many of the groups identified therein will be vulnerable to the effects of fuel poverty, and that this should be used to target and prioritise resources.

Protected characteristics

Age

- 8.12. Negative impacts identified with respect to age were sometimes associated with the respondent's view of the wider negative effects of the proposals for rural and island communities, many of which have a high proportion of older people.
- 8.13. Around 1 in 7 of those who commented suggested the proposed change in the age threshold to have potentially negative impacts on those between 60 – 75 years and as not taking account of variations in life expectancy across Scotland. While one respondent suggested retention of eligibility for those who are vulnerable to be sufficient mitigation, others pointed to the importance of additional work recommended by the Definition Review Panel (i.e. 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') to mitigating potential impacts.
- 8.14. Children under 5 were also identified as potentially experiencing negative impacts if there is no enhanced heating regime for households with children under 5. It was suggested that although the consultation paper notes there is a lack of evidence on the need for a higher temperature for bedrooms of children under the age of 5, no allowance is made for households needing to heat their home for longer periods of time, as they might spend more time at home.

Disability

- 8.15. Negative impacts identified centred on the proposal that MIS thresholds will not be adjusted for households where at least one member is long-term sick or disabled. This was suggested as having the potential to have a negative impact on people with a disability and their carers. This was raised by around 1 in 5 of those who commented.

- 8.16. It was also noted that independent living is an important human right enshrined in the Convention on the Rights of Persons with Disabilities and it was argued that the definition of fuel poverty should address the increased costs that households including a disabled person or person with a long-term illness face.
- 8.17. The addition of a disability enhancement of £83 a week to the MIS for other living costs faced by disabled people was proposed in mitigation.

Race

- 8.18. It was suggested there may be a positive impact for BME groups as the new definition could allow more BME households to fall within the scope of fuel poverty programmes. It was also argued that outcomes for BME communities must be monitored and recorded to ensure that disparate effects are not missed.
- 8.19. Lack of measures to reduce fuel poverty among the Gypsy/Traveller community living in caravans and mobile homes was highlighted. Work with the community to identify steps that could be taken to reduce fuel poverty was suggested, including specific work around examining energy prices on some local authority sites. Issues including being unable to switch fuel supplier and the use of prepayment meters were identified as contributing to high energy costs.

Pregnancy

- 8.20. The absence of an impact assessment relating to pregnant women was noted and it was suggested that this is an issue that needs to be addressed urgently. Reasons given included health issues and the need for early intervention in tackling inequality as it was suggested that children born into poverty are more likely to continue in poverty and experience additional inequalities.

Sex and sexual orientation

- 8.21. Deduction of childcare costs from AHC was suggested as of particular benefit to women as more will be considered fuel poor and eligible for assistance.
- 8.22. Absence of an enhanced heating regime for children under 5 was suggested to have a potentially negative effect for women as the most likely to remain at home with children under 5.

General points on assessing impact

- 8.23. Respondents also made a small number of general points relating to impacts including:
- Querying the absence of an island impact assessment.
 - Suggesting there should be assessment against the requirements of the new socio-economic duty.

- Suggesting a broader approach, linking this Strategy to other Scottish Government strategies and legislation. Specific suggestions included Child Poverty, Transport Poverty, Mental Health, the upcoming Healthier Futures Strategy, the new Social Security Bill and the Race Equality Framework.

8.24. Moving on to the second type of impact, the consultation paper explains that a Business Regulatory Impact Assessment (BRIA) allows assessment of the likely financial costs and benefits and the associated risks of the proposals that might have an impact on the public, private or third sector.

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

8.25. A total of 53 respondents provided an answer to Question 23. A breakdown of answers by respondent type is set out in Table 26 below.

Table 26: Number of comments by respondent type

Type of respondent	Number of comments
Organisations:	
<i>Community or Tenant Group or Federation</i>	3
<i>Energy Company</i>	2
<i>Health and Social Care</i>	3
<i>Housing Association</i>	6
<i>Housing Body or Group</i>	3
<i>Inter-agency Group or Partnership</i>	4
<i>Local Authority</i>	18
<i>Other</i>	4
<i>Research Group</i>	1
<i>Third Sector</i>	7
Organisations	51
Individuals	2
All respondents	53

8.26. Around 1 in 8 respondents who answered the question commented that they are unclear what the implications might be at this stage, sometimes pointing to lack of detail in the current proposals.

Additional work or costs

- 8.27. Requirements for additional staff time, numbers, specialism or training were suggested as implications of the proposals, with specific elements mentioned including:
- Requirements for additional work to collect and assess data and, in particular, the proposed doorstep approach.
 - Increased burdens in terms of reporting and monitoring.
- 8.28. It was suggested that additional costs associated with enabling work could reduce the funds for delivery, or that additional funds would be required. Good partnership working and making best use of available data were suggested to have the potential to reduce costs.
- 8.29. A small number of respondents pointed to increased costs to both businesses and delivery organisations, particularly when working in remote rural and island communities. Flexibility around funding and delivery were suggested to be important and the need for rural proofing or island proofing were again raised.

Additional funding

- 8.30. Local authority respondents in particular were amongst those who pointed to the demand on existing resources and the need for additional funding or longer-term funding. Around 1 in 5 of those who answered the question made this point. The Scottish Government was urged to work with councils and others to make a realistic estimate of costs as the basis for a discussion about what can realistically be achieved with the resources available, as well as the potential impacts on other programmes.
- 8.31. Energy efficiency improvements were noted as requiring significant investment through SEEP as well as actions to encourage investment in the private sector. SEEP funding of around £10bn over the first ten years was estimated to be needed, with a suggestion that 45% of this should come from public funds.
- 8.32. Government support for rural landlords to upgrade traditional buildings was also suggested to be needed to reduce the risk of these properties being lost from the private rental market.

Economic benefits

- 8.33. Around 1 in 6 respondents who answered the question identified opportunities for job creation as a possible benefit, with a smaller number suggesting the potential for business development and that sustainable funding sources could give private companies the confidence to set up in remote areas. Energy efficiency improvements were particularly noted to bring economic benefits, and to be a labour-intensive industry. Warmer Homes Scotland was suggested as offering a good model to support local jobs and training which could be replicated and scaled up.

- 8.34. Where possible, it was suggested, local supply chains should be supported, although also that local businesses may not be able to cope with demand. A further cautionary note sounded was that any policy changes that adversely affect delivery to island communities could damage local supply chains and could lead to job losses.
- 8.35. Development and delivery of local energy systems were also noted to provide business opportunities.

Other benefits

- 8.36. Respondents also suggested that any additional costs should be offset by benefits including improved healthcare outcomes or that they expected long-term outcomes should be positive. Specifically, it was suggested that improving the energy efficiency of all fuel poor homes to EPC band C would deliver savings of £40-80 million per year to the NHS.
- 8.37. The final question in the consultation paper concerned children's rights. It was explained that a Children's Rights and Wellbeing Impact Assessment (CRWIA) will allow assessment of whether the proposals will advance the realisation of children's rights in Scotland and protect and promote the wellbeing of children and young people.

Question 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?

- 8.38. Responses to Question 24 by respondent type are set out in Table 27 below.

Table 27: Responses by respondent type

Type of respondent	Positive Impact	Negative Impact	No Impact	Not answered	Total
Organisations:					
<i>Community or Tenant Group or Federation</i>	2			2	4
<i>Energy Company</i>				6	6
<i>Health and Social Care</i>	2			3	5
<i>Housing Association</i>		2	1	5	8
<i>Housing Body or Group</i>		1		2	3
<i>Inter-agency Group or Partnership</i>	1	1		3	5
<i>Local Authority</i>	12		3	6	21
<i>Other</i>		1	1	5	7
<i>Research Group</i>		1		1	2
<i>Third Sector</i>	5		1	13	19
Total organisations	22	6	6	46	80
% of organisations answering	65%	18%	18%		
Individuals	2	1	0	8	11
% of individuals answering	67%	33%	0%		
All respondents	24	7	6	54	91
% of all respondents	26%	8%	7%	59%	
% of all those answering	65%	19%	16%		

Figures do not sum to 100% due to rounding

8.39. Of respondents who answered the question, 65% suggested there would be a positive impact for children's rights, while 19% thought impacts would be negative and 16% did not foresee any impacts.

8.40. A total of 45 respondents provided an additional comment, with a breakdown of the number of comments by respondent type set out in Table 28 below.

Table 28: Number of comments by respondent type

Type of respondent	Number of comments
Organisations:	
<i>Community or Tenant Group or Federation</i>	1
<i>Energy Company</i>	2
<i>Health and Social Care</i>	3
<i>Housing Association</i>	6
<i>Housing Body or Group</i>	2
<i>Inter-agency Group or Partnership</i>	4
<i>Local Authority</i>	18
<i>Other</i>	1
<i>Research Group</i>	1
<i>Third Sector</i>	4
Organisations	42
Individuals	3
All respondents	45

8.41. Around 1 in 4 of those who commented expressed a view that any initiative to reduce inequalities or target fuel poverty in households with children is welcome. The desirability of the Fuel Poverty Strategy adopting a rights-based approach was suggested by several respondents.

8.42. It was also argued that while the introduction to the consultation paper recognises the negative impact of fuel poverty on children’s health and wellbeing, this is not reflected in the Strategy. Specifically, it was suggested that reference to duties placed on local authorities and NHS Boards under the Child Poverty (Scotland) Act 2017 could help to connect priorities and strengthen action, particularly at a local level.

Positive impacts

8.43. Among reasons given for suggesting positive impacts were better targeting of households in fuel poverty, or that use of the MIS, AHC income, and deduction of childcare costs means that more households with children will be included as fuel poor and eligible for assistance.

8.44. Benefits identified for children included improved living conditions and quality of life, better health and wellbeing, and improved educational achievement. A small number of respondents also referred to the value of improved social inclusion and to children having a better sense that society cares about them and their families.

8.45. Respondents anticipating positive impacts sometimes added caveats to the effect that this would not be the case if the new Strategy places rural areas at

a disadvantage or that they were assuming the Strategy would address all main and fluctuating drivers of fuel poverty.

Negative impacts

- 8.46. Negative impacts arising from the new definition of fuel poverty were suggested, including that resources may be diverted away from households with children. Other negative impacts included that the timescales being adopted are too long.
- 8.47. References to the United Nations Convention on the Rights of the Child (UNCRC) included suggestions that:
- Removal of the enhanced heating regime for children under 5 might affect the right of children to an adequate standard of living under article 27.
 - The Scottish Government should incorporate the UNCRC and also the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) into the final Strategy.

Mitigating action suggested with respect to the first point above was to assess whether there is sufficient evidence on the impact on children under 5 of reducing the enhanced temperature and the number of hours of heating.

Annex 1: Organisations responding to the consultation

Respondent	Respondent Type
Kyle Sutherland Development Trust	Community or Tenant Group or Federation
North of Scotland Regional Network 1	Community or Tenant Group or Federation
Peebles Community Council	Community or Tenant Group or Federation
Scottish Islands Federation	Community or Tenant Group or Federation
Calor Scotland	Energy Company
EDF Energy	Energy Company
NPOWER	Energy Company
Scottish Power	Energy Company
SGN	Energy Company
SSE	Energy Company
Health and Social Care Alliance Scotland (the ALLIANCE)	Health and Social Care
NHS Grampian	Health and Social Care
NHS Health Scotland	Health and Social Care
Public Health in NHS Ayrshire and Arran	Health and Social Care
Stewartry Health and Wellbeing Team on behalf of Stewartry Health and Social Care	Health and Social Care
Almond Housing Association	Housing Association
Hebridean Housing Partnership	Housing Association
Lochalsh and Skye Housing Association Energy Advice Service	Housing Association
Ore Valley Housing Association	Housing Association
Orkney Housing Association Ltd	Housing Association
Rural and Islands Housing Association Forum	Housing Association
Scottish Federation of Housing Associations	Housing Association
The Highlands and Islands Housing Associations Affordable Warmth Group	Housing Association
Chartered Institute of Housing Scotland	Housing Body or Group
Existing Homes Alliance	Housing Body or Group
Shelter Scotland	Housing Body or Group
Highland Affordable Warmth Partners Group	Inter-agency Group or Partnership
Scarf and Aberdeenshire Council	Inter-agency Group or Partnership
Scotland's National Action Plan: Adequate Standard of Living Reference Group	Inter-agency Group or Partnership
Shetland Fuel Poverty Action Group	Inter-agency Group or Partnership
THAW Orkney	Inter-agency Group or Partnership
Aberdeen City Council	Local Authority

Respondent	Respondent Type
ALACHO	Local Authority
Angus Council	Local Authority
Argyll & Bute Council	Local Authority
City of Edinburgh Council	Local Authority
Comhairle Nan Eilean Siar	Local Authority
COSLA	Local Authority
Dumfries and Galloway Council	Local Authority
Dundee City Council	Local Authority
East Ayrshire Council	Local Authority
East Lothian Council	Local Authority
Falkirk Council	Local Authority
Fife Council	Local Authority
Glasgow City Council	Local Authority
Highland Council	Local Authority
Moray Council	Local Authority
North Ayrshire Council	Local Authority
Orkney Islands Council	Local Authority
Renfrewshire Council	Local Authority
Scottish Borders Council	Local Authority
South Lanarkshire Council	Local Authority
Church of Scotland	Other
Equality & Human Rights Commission	Other
Highlands & Islands Enterprise	Other
Irt Surveys Ltd	Other
Scottish Independent Advocacy Alliance	Other
Scottish Land & Estates	Other
UNISON Scotland	Other
Energy Poverty Research	Research Group
GoWell Research & Learning	Research Group
Ability Borders	Third Sector
AGE Scotland	Third Sector
ALI Energy	Third Sector
Changeworks Resources for Life Ltd	Third Sector
Citizens Advice Scotland – Consumer Futures Unit	Third Sector
Coalition for Racial Equality and Rights	Third Sector

Respondent	Respondent Type
Community Energy Scotland	Third Sector
Energy Action Scotland	Third Sector
Energy Agency	Third Sector
Energy Saving Trust	Third Sector
Greener Kirkcaldy	Third Sector
Inclusion Scotland	Third Sector
Keep Scotland Beautiful	Third Sector
Outside the Box	Third Sector
Scottish Rural Action	Third Sector
South Seeds	Third Sector
The Wise Group	Third Sector
Tighean Innse Gall	Third Sector
WWF Scotland	Third Sector

Annex 2: List of Acronyms

Acronym	Full Title
ABS	Areas-Based Schemes
AHC	After Housing Cost
BME	Black and Minority Ethnic
BRIA	Business Regulatory Impact Assessment
CaCHE	Collaborative Centre for Housing Evidence
CPP	Community Planning Partnership
CRWIA	Children's Rights and Wellbeing Impact Assessment
DWP	Department of Work and Pensions
EAS	Energy Action Scotland
ECO	Energy Company Obligation
EPC	Energy Performance Certificate
EQIA	The Equality Impact Assessment
EST	Energy Saving Trust
HEEPS	Home Energy Efficiency Programmes
HES	Home Energy Scotland
HIIA	Health Inequalities Impact Assessment
KPI	Key Performance Indicator
LCPP	Local Community Planning Partnership
LEAF	Local Energy Advice Forum
LHEES	Local Heat and Energy Efficiency Strategy
MIS	Minimum Income Standard
rdSAP	reduced dataset Standard Assessment Procedure
SAP	Standard Assessment Procedure
ScotPHN	Scottish Public Health Network
SEEP	Scotland's Energy Efficiency Programme
SHCS	Scottish Housing Condition Survey
SIMD	Scottish Index of Multiple Deprivation
UNCRC	United Nations Convention on the Rights of the Child
UNCRPD	United Nations Convention on the Rights of Persons with Disabilities



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Edinburgh
EH1 3DG

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