

UK FUEL POVERTY MONITOR 2018-19



Action for Warm Homes





INTRODUCTION

National Energy Action (NEA) and Energy Action Scotland (EAS) are the national fuel poverty charities, aiming to support low-income and vulnerable UK households who are unable to meet their energy needs for comfort, warmth and an acceptable standard of living. Every year for the past 17 years, we have published an investigative report on progress to tackle fuel poverty across the UK and within each of the four UK nations: the UK Fuel Poverty Monitor is that report.

The UK Fuel Poverty Monitor assesses and reviews policies which are either aimed at or affect the main drivers of fuel poverty, namely: the energy efficiency of domestic dwellings, household incomes and the cost of energy. It takes learnings from this exercise to identify gaps in support, understand where policies are working to address fuel poverty and where further action may be needed. It brings these insights together to develop UK-wide and nation-specific recommendations.

This year, the focus of the Monitor is on progress in delivering existing fuel poverty strategies in England, Wales, Scotland and Northern Ireland. This is particularly timely, given the warning made in July 2019 by the Department for Business, Energy and Industrial Strategy (BEIS) Select Committee on Climate Changeⁱ that the UK ‘stands no chance’ of meeting its 2050 net zero emissions target without urgent action on energy efficiency, and its call for the UK Government to revive ‘failing’ policies to meet climate change targets and tackle fuel poverty.

The Fuel Poverty Monitor 2018-19 has been written at a time of change and uncertainty with regards to the future direction of fuel poverty policy in the UK (and one at which we are on course to miss all the existing fuel poverty milestones and targets, with the exception of Scotland)ⁱⁱ. In July 2019, BEIS released a consultation on updates to the 2015 Fuel Poverty Strategy for England. In June 2019, the Scottish Parliament passed the Fuel Poverty

(Targets, Definition and Strategy) (Scotland) Bill, with the intention of preparing a Fuel Poverty Strategy. In Wales, where the 2010 Fuel Poverty Strategy is now out of date, the Welsh Government has indicated its intention to work towards an updated plan in the autumn of 2019. And, in Northern Ireland, the continued political impasse means crucial policies, like the new Fuel Poverty Strategy and Northern Ireland Energy Framework, have not yet been introduced.

Such changes make 2019 a timely point at which to review the extent to which current policies and strategies have been implemented on the ground and assess how far they remain fit for purpose. It is also an opportunity to identify where challenges and barriers exist within the current landscape for tackling fuel poverty, as well as understand which existing policy levers have acted as enablers for action on cold homes.

In May 2019, NEA and EAS issued a Call for Evidence (CFE) to stakeholders operating across the UK and across sectors such as energy supply, distribution and installation, local government, national and devolved government, health and social care and housing and the third sector. The Call looked to understand the views and practical experiences of organisations that are delivering actions to reduce fuel poverty under existing national fuel poverty strategies. In total, 119 responses were received. Where relevant, the report draws on this feedback and presents country- and UK-wide recommendations to end the cost and unnecessary suffering fuel poverty continues to cause, despite the first commitment to eradicate this scourge almost twenty years ago.

ENERGY EFFICIENCY TIMELINE

1980s

- Establishment of community schemes to install loft insulation in homes

1981

- NEA founded as Neighbourhood Energy Action

1983

- EAS founded as Scottish Neighbourhood Energy Action

1991

- Home Energy Efficiency Scheme (HEES) introduced in Great Britain

1992

- Domestic Energy Efficiency (DEES) scheme introduced in Northern Ireland

1994

- Energy Efficiency Standards of Performance (EESoP) introduced by Office of Electricity Regulation (now Ofgem) as an obligation on electricity suppliers

1995

- Home Energy Conservation Act (HECA)

1996

- HECA extended to Northern Ireland

1997

- Winter Fuel Payments introduced
- Energy Efficiency Levy introduced (now Northern Ireland Sustainable Energy Programme (NISEP))

2000

- EESoP closes
- Warm Front Scheme replaces HEES in England
- HEES introduced in Wales
- Warm Homes and Energy Conservation Act becomes law in England and Wales
- Central Heating Programme and Warm Deal launched in Scotland

2001

- First UK Fuel Poverty Strategy published
- Decent Homes Standard introduced
- Housing (Scotland Act)
- Warm Homes scheme replaces DEES in Northern Ireland

2002

- Energy Efficiency Commitment (EEC) replaces DEES in EESoP and covers both gas and electricity
- Welsh Housing Quality Standard introduced

2003

- A fuel poverty commitment for Wales published by Welsh Government

2004

- HHSRS introduced in England and Wales
- First Northern Ireland Fuel Poverty Strategy
- Scottish Housing Quality Standard introduced and replaced by Energy Efficiency Standard for Social Housing

2005

- EEC replaced by Carbon Emissions Reduction Target (CERT)

2008

- Community Energy Saving Programme (CESP) introduced
- Feed-in Tariff introduced (FiT)

2009

- Scottish Government introduces Energy Assistance package to replace Warm Deal and Central Heating Programme
- Arbed established as an area-based scheme in Wales

2010

- Fuel Poverty Strategy for Wales is published
- NEST is introduced to replace HEES in Wales
- Introduction of the Warm Home Discount (WHD)
- Phasing out of Warm Front in England by 2013 is announced by Government

2011

- Renewable Heat Incentive (RHI) introduced

2012

- Introduction of the Low Income High Costs (LIHC) indicator in England

2013

- Home Energy Efficiency Programme for Scotland (HEEPS) introduced to replace Energy Assistance package. Energy Assistance Scheme also introduced

- Green Deal is launched
- Welsh Government publishes Wales Fuel Poverty Projection Tool
- Fuel Poor Network Extension Scheme (FPNES) introduced as part of RIIO-GD1 network price control
- Better Care Fund introduced
- The Energy Company Obligation (ECO) is introduced to replace CERT and CESP

2014

- Major changes to the Energy Company Obligation (ECO) announced, including reduction in targets by over 30%
- UK Government introduces the Energy Efficiency (Private Rented Property) Regulations in England and Wales

2015

- Fuel Poverty Strategy for England is published
- Scottish Government designates energy efficiency as an infrastructure priority
- NICE NG6 guideline on excess winter deaths and illness and the health impacts of living in a cold home is published
- Green Deal ends
- Further cuts to ECO budget announced
- WHD extended until 2021
- Warm Home Scheme closes in Northern Ireland
- Affordable Wamth Scheme launched in Northern Ireland

2016

- Energy Efficiency Strategy for Wales published
- National smart meter roll-out begins

2017

- Pre-Payment Customer Price Cap introduced by Ofgem

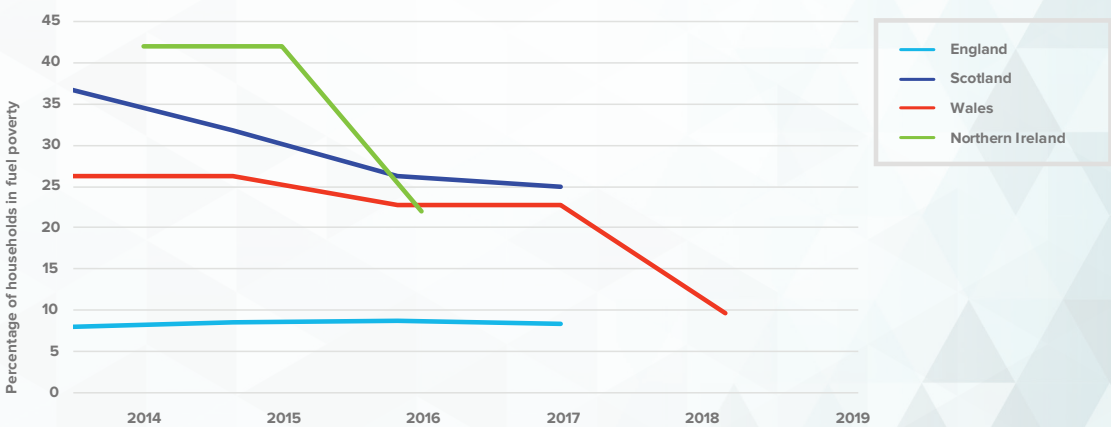
2018

- ECO3 retargetted entirely at low income and vulnerable households
- Vulnerable Customer Safegaurd Tariff introduced by Ofgem

2019

- Fuel Poverty (Targets, Definition and Strategy) (Scotland) Act
- Fuel poverty strategy consultation in England
- Feed-in Tariff closes to new applicants
- Minimum Energy Efficiency Standards in the Private Rented Sector (MEES) introduced in England and Wales
- UK Government launches consultation into market barriers to energy efficiency in the UK
- Health Prevention Green Paper published clearly acknowledging the link between cold homes and ill-health

Fuel poverty levels across the UK since 2014*



	Fuel Poverty Levels				
	2014	2015	2016	2017	2018
England	10.6	11	11.1	10.9	
Scotland	34.9	30.7	26	24.9	
Wales	26	26	23	23	12
Northern Ireland	42	42	22		

*Fuel poverty rates based on differing definitions and data availability within each nation.

ENGLAND COUNTRY REPORT

‘Cutting the cost of keeping warm: a fuel poverty strategy for England’ was published in 2015ⁱⁱⁱ. On 22nd July 2019, the Department for Business, Energy and Industrial Strategy (BEIS) published a consultation^{iv} to seek views on proposals to update the fuel poverty strategy and assess Government’s implementation of the strategy to date.

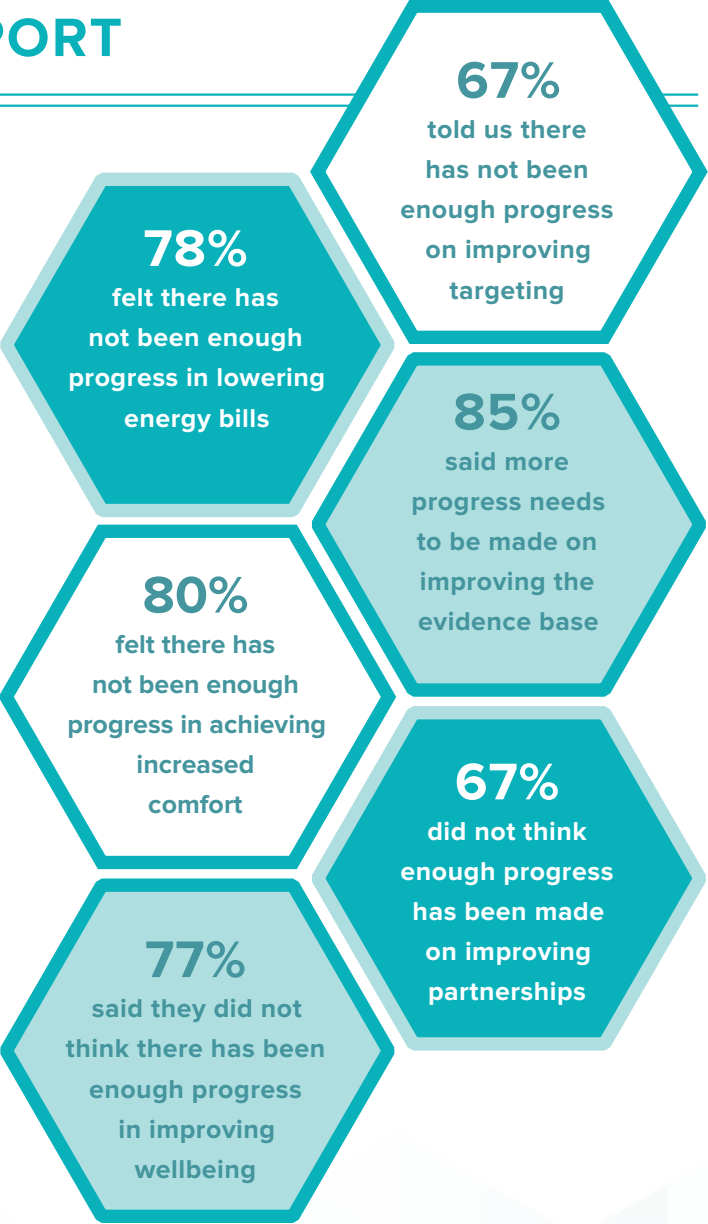
Key guiding principles of the 2015 strategy included:

- Prioritising the most severely fuel poor (those with the highest fuel poverty gaps)
- Supporting the fuel poor with cost effective policies
- Reflecting vulnerability in policy decisions

In 2017, (the latest year for which data is available), the proportion of English households living in fuel poverty decreased slightly from 11.1% to 10.9% (approximately 2.53 million households). The average fuel poverty gap (the amount needed to meet the fuel poverty threshold) was estimated at £321.

The winter of 2017/18 saw the highest recorded number of Excess Winter Deaths since 1975 – 1976, with 50,100 excess deaths in England & Wales (provisional). Of these, 15,030 (30%) were attributable to cold homes.

The majority of respondents to our Call for Evidence¹ felt that these were the right guiding principles to be focusing on. However, only 26% felt that the most severely fuel poor have been prioritised in practice, since 2015. Only 17% felt that cost-effective policies have been put in place or that vulnerability has been adequately reflected in policy decisions to date.



The Government introduced statutory fuel poverty targets in December 2014. The targets look to ensure that as many fuel poor homes as reasonably practicable achieve a minimum energy efficiency rating of a Band C by 2030. Key milestones include lifting as many fuel poor homes in England as is reasonably practicable to Band E by 2020; and Band D by 2025. The 2019 fuel poverty strategy consultation indicates that the Government is minded to retain this target, in line with the new Clean Growth Strategy^v.

Whilst respondents to our CFE generally felt that having milestones in place was a positive move that could give focus and encourage action, 85% did not think that the 2020 milestone would be met. Meanwhile, 75% doubted that the 2025 milestone or the 2030 target would be met using currently available mechanisms. Indeed, analysis

by NEA^{vi} indicates it would take 96 years under current rates of installation to meet the 2030 target. The Committee on Fuel Poverty (CFP) and the Committee on Climate Change (CCC) have highlighted that, if energy efficiency investment shortfall is not addressed, the Government will “end up in contravention of statutory fuel poverty and climate targets.”^{vii}”

What has been done to implement the strategy to date?

The 2019 fuel poverty consultation states that key successes to improving energy efficiency standards in fuel poor homes have been the extension and reform of the Energy Company Obligation (ECO), and the introduction of Minimum Energy Efficiency Standards (MEES) in the private-rented sector.

Government has looked to increase and enable more partnership working across sectors by: introducing ECO flexible eligibility mechanisms and publishing toolkits on health evaluation, health referrals and health partnerships.

It also notes efforts by local authorities, energy suppliers, distribution networks, third sector organisations and health and social care bodies to work together to combine funding streams to deliver support and develop joint referral processes. National award schemes and the establishment of groups such as the EU Energy Poverty Observatory and the Fuel Poverty and Cold-related Ill Health working group have looked to encourage partnerships and collaboration.

One development in enabling better targeting of fuel poor households has been the creation of the non-gas map, as well as efforts by local authorities, energy sector partners and other organisations to use existing data to create local mapping tools. Government, third sector and academic organisations have also been working to develop the evidence base on, and understandings of, fuel poverty.

Government also outlines the means through which, since 2015, scheme operators have been able to deliver energy efficiency improvements to

households. This list includes: The Central Heating Fund (CHF) (now ended); the Fuel Poor Network Extension Scheme (FPNES) (funded via network price controls and therefore through energy bills); National Grid Affordable Warmth Solutions Warm Homes Fund (private-sector investment); Warm Home Discount Industry Initiatives (funded via a levy on energy bills); the Health Booster Fund (now ended); and ECO (funded via a levies on energy bills). The introduction of Ofgem’s safeguard tariff in 2017 (now ended) and the Prepayment Meter (PPM) and standard variable/default price caps have helped to protect vulnerable customers from the highest energy prices.

There is however no current centrally-funded national or area-based energy efficiency scheme in England. Government also highlights the smart meter roll-out as being a key lever in helping customers ‘take control’ of their energy use, and notes that the Big Energy Saving Network (BESN) has also supported vulnerable and low-income households to find the best energy deal for them.

“85% of respondents did not think that the 2020 milestone would be met.”

1. The Call for Evidence was distributed to c.250 stakeholders. In total, 40 responses were received, representing a 28% response rate (approximately). Respondents represented the third sector (26%); local authorities (31%); housing providers (8%); distribution companies (5%); private companies, installers or energy companies (9%); community interest companies (3%) and 20% were from other sectors (including universities and trade associations).

Stakeholders that responded to our Call for Evidence felt that there have been some enablers in working to meet the outcomes and targets set out in the 2015 strategy to date:

- Increased tendency of scheme providers to lever in external funding (when it is available) or blend funding programmes (where possible) to deliver their services and proactive scheme providers, especially local authorities, who are willing to champion energy efficiency improvements in fuel poor communities
- Improved ability of some scheme providers to use existing evidence and data to demonstrate the value of their services (partly a result of having to blend available funding sources across sectors)
- Improved partnership working with increasing partnerships being put in place between local authorities, health agencies, the voluntary sector and fuel/distribution companies
- Introduction of flexible eligibility criteria under ECO and increased focus on vulnerable residents to help reach those in need
- Working to engage external partners, including in the health and social care sector, to raise awareness and identify households in fuel poverty through training and engagement activities
- Using local knowledge to target and shape programmes that respond to local need and conditions e.g. availability of mapping tools and use of local data to identify hotspots



However, the majority of respondents had encountered challenges in trying to meet the outcomes and targets included in the strategy.

According to CFE respondents, barriers to meeting the key outcomes and targets of the strategy include:

- Lack of a stable, central, long-term funding stream(s) for energy efficiency measures and revenue costs
- Lack of enforcement on landlords and challenges of compelling work under MEES with a £3,500 cap
- Lack of provision for hard-to-treat properties, including off-gas households
- Complications created by using LIHC as a fuel poverty indicator
- Restrictions on activity caused by GDPR
- Concerns that widened eligibility criteria for support reduces amount of help directed at those most in need
- Action on carbon emissions has stalled due to reduced available funding for energy efficiency and renewables
- Challenges arising from the methods used to calculate EPCs and using this to target support/evaluate schemes
- The impact of austerity (including benefits freezes and low incomes) for vulnerable households and rising levels of fuel debt/fuel arrears
- Concerns around escalating or high energy costs for vulnerable consumers (despite the PPM cap and safeguard tariff)
- More evidence needed on: extent to which ECO reaches fuel poor households, impact of fuel poverty interventions on health and wellbeing, impact of smart metering on energy behaviours, research on 'churn'

How does Government propose to address challenges in delivering on the fuel poverty strategy going forward?

The 2019 fuel poverty strategy consultation acknowledges that certain tools that would use powers under the Digital Economy Act 2017 to improve the identification and targeting of fuel poor households are not yet available, though work in this area is ongoing. Improvements to targeting would look to increase the number of households in receipt of the automatic WHD rebate in future, and to match data held by the Department of Work and Pensions to verify eligibility for energy efficiency support.

Government will also be reviewing proposals across Great Britain for ensuring vulnerable and disengaged customers are adequately safeguarded in future energy markets. Government will be consulting on whether suppliers are sufficiently incentivised to meet the needs of vulnerable and disengaged customers in ways that ensure they can benefit from energy market changes. Similarly, the existing mechanisms for providing bill support to low-income households (Warm Home Discount, Winter Fuel Payments, Cold Weather Payments) will be assessed and reviewed going forward.

Government are also considering updating the guiding principles of the strategy. This would mean that, under **prioritisation of the most severely fuel poor**, the possibility of delivering whole-house retrofits and providing multiple, simultaneous measures through ECO ('straight to C') would be clarified. Under the principle of **supporting the fuel poor with cost-effective policies**, Government will be seeking views as to how different sectors can work together to cost-effectively deliver support across the housing stock. When it comes to **reflecting vulnerability in policy decisions**, Government proposes to clarify that the impact of policies on the health and wellbeing of people living on low incomes will be taken into account. Fuel poverty policies will therefore need to be designed with the needs of particular vulnerable households in mind, as well as providing clarity on who would be considered

to be most at risk. Importantly, Government envisions the updated fuel poverty strategy as complementing health-based policies that look to reduce health inequalities. The consultation states the intention to develop a means of measuring the link between fuel poverty and health and wellbeing. Finally, Government proposes to incorporate a new principle into the updated strategy: **designing sustainable fuel poverty policies**. This would mean fuel poverty policies would need to be designed in line with key sustainability priorities like the Clean Growth Strategy, Clean Air Strategy and the Industrial Strategy. In the consultation, Government acknowledges the growing role of renewable technologies in decarbonisation efforts and states an intention to report on the impact of renewable technologies on the fuel poor in the future.

Defining fuel poverty in England

With regards to the existing Low Income High Costs (LIHC) indicator², 82% of respondents said it was ineffective in defining and identifying households in or vulnerable to fuel poverty. Whilst it was felt that the indicator has been useful in illustrating the fuel poverty gap, stakeholders noted that:

- It is difficult to use LIHC to demonstrate fuel poverty at an individual level, risking vulnerable households being excluded from support
- It is a difficult concept to explain to the general public thus transforming it into a technical tool rather than a practical one for advisors

The 2019 fuel poverty strategy consultation document outlines Government proposals for updating the way fuel poverty in England is defined and measured. The proposed ‘Low Income Low Energy Efficiency’ (LILEE) measure would class a household as fuel poor if:

- The property in which they are living has a Fuel Poverty Energy Efficiency Rating (FPEER) of Band D, E, F, or G
- After housing and energy costs are deducted, their disposable income is below the poverty line

It is hoped that the proposed new definition would be more reflective of churn (households moving in and out of fuel poverty) and be better aligned with the fuel poverty strategy. It would increase the number of households considered to be fuel poor in FPEER Bands D-G by over a million. It would however reclassify around 200,000 households in Band C and above from fuel poor to non-fuel poor.

Consideration does therefore need to be given to how properties that cannot be improved to Band C, or households living in properties Band C or above but who are struggling on low incomes, could be identified and targeted for bill support.

“82% of respondents said [LIHC Indicator] was ineffective in defining and identifying households in or vulnerable to fuel poverty”

2. Following the publication of the Hills Review in 2012, a new definition of fuel poverty was introduced in England. The Low Income High Costs (LIHC) indicator considers that a household is fuel poor if they have required fuel costs that are above the national median level and, were they to spend that amount, they would be left with a residual income below the poverty line.

Existing available mechanisms to address fuel poverty in England

The Energy Company Obligation (ECO), GB-wide

Whilst 77% of stakeholders felt that current attempts to deliver ECO3³ to support rural households are ineffective, 70% felt that flexible eligibility criteria had been effective in reaching vulnerable households in or at risk of fuel poverty.

Rural sub-obligation: **what works**

- Having strong, inter-agency partnerships at local level
- Delivering area-based schemes, especially in places like Park Home sites
- Promoting loft and cavity wall insulation to off-gas households

Rural sub-obligation: **challenges**

- ECO funding being insufficient to cover the full cost of the measure(s) required. Limited ability of fuel poor households to contribute to the cost and limited available grant support to fund top-ups
- Targeting and identifying rural fuel poor households is complex
- Restrictive nature of measures available mean ECO may not offer solutions for off-gas, rural households
- Complex and time-consuming process to lever-in funding for measures

ECO-flex: **what works**

- Allows low-income households struggling with fuel bills to be supported by removing the need to be in receipt of means-tested benefits
- Setting up more formal processes to help households enter the ECO process and engage in more targeted promotional activity
- It encourages partnerships and establishment of referral systems

ECO-flex: **challenges**

- ECO-flex referrals still dependent on availability of funding, so support is not guaranteed
- Risk that the flex element is being used to drive up volume of measures installed rather than to target the most vulnerable
- Need to identify top-up/gap funding where the full cost of required measures is not covered by ECO
- Postcode lottery situation created by patchy coverage of ECO-flex across local authorities
- Limited guidance on producing Statements of Intent has meant some areas have set inappropriate eligibility criteria (e.g. all older people).

3. The ECO3 scheme commenced in December 2018 and runs until 31st March 2022. The scheme will now be exclusively targeted at 6 million fuel poor, vulnerable and low-income customers. The new scheme also requires suppliers to meet 15% of their obligation through delivering measures in rural areas. There will be an uplift for measures delivered to low-income households living in F- and G-rated properties under the Flexible Eligibility part of the scheme. However, landlords with F/G properties will not be able to access this money, under MEES regulations. ECO3 will furthermore allow limited oil boiler delivery to take place within the broken heating system cap. Government have decreased the supplier threshold in a phased way to 150,000 customer accounts (or equivalent) from April 2020, meaning that more suppliers will be obligated to take part in the scheme, and more customers will receive measures.

Warm Home Discount (WHD) Industry Initiatives, GB-wide

WHD Industry Initiatives⁴ was largely viewed positively in terms of delivering support to households in or at risk of fuel poverty and ease and efficiency of delivery by 75% of stakeholders.

WHD industry initiatives have:	Challenges of WHD industry initiatives:
<ul style="list-style-type: none">• Funded the expansion of schemes across an area• Supported households unable to access ECO funding• Delivered targeted advice, support and small measures to address issues not covered by ECO3 provision• Helped people to stay warm over winter by paying for fuel top-ups• Provided opportunities to install heating measures to test the links between cold homes and cold-related ill health• Helped to combat fuel poverty in remote, off-gas areas by installing technologies such as Air Source Heat Pumps (ASHP)• Installed measures not allowed under ECO• Provided support through delivering income maximisation advice and debt relief, as well as wider energy efficiency advice	<ul style="list-style-type: none">• Inconsistencies between providers with varying criteria/application processes, making it difficult to take a consistent area approach• Funding only approved annually which causes problems with staff recruitment and retention• Can be difficult to integrate complexities of working with vulnerable households to the rigidity with which some suppliers interpret Ofgem guidance• Inflexible timescales for delivery

“77% of stakeholders felt that current attempts to deliver ECO3 to support rural households are ineffective”

4. The Industry Initiative element of the Warm Home Discount scheme allows suppliers to help fuel-poor customers through third parties.

Minimum Energy Efficiency Standards in the Private Rented Sector (MEES)

Of CFE respondents, 67% felt that MEES⁵, in its current form, would be ineffective in helping to meet the 2030 target. 83% did, however, feel that the regulations would increase, at least slightly, the number of energy efficiency measures installed.

<div>Ways that MEES can deliver support to fuel poor households</div> <div><ul style="list-style-type: none">• Proactive enforcement campaigns led by local authorities• Increasing the number of installations before new tenants enter a property• Awareness-raising and engagement activities with landlords and agents with advice on how to comply</div>	<div>Challenges to improving energy efficiency through MEES</div> <div><ul style="list-style-type: none">• Lack of resources within local authorities to carry out proactive enforcement of MEES• Low tenant awareness of rights/lack of tenant empowerment to enforce rights• £3500 cap may not be high enough to ensure the worse properties are improved• EPC data may not be the most effective means of measurement• Energy efficiency improvements may drive up rent for vulnerable households in a situation where there is already a growing gap between rent levels and housing benefit, thus driving low-income households into poor quality, energy-inefficient homes</div>
<div>Suggestions from stakeholders</div> <div><ul style="list-style-type: none">• Moving to a system of mandatory licensing of all rented properties• National register of private landlords accompanied by training for landlords on their responsibilities• MEES targeting to reflect the diversity of PRS• Further guidance on acceptable heating levels for Category 1 hazards</div>	

5. The Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015 establish a minimum level of energy efficiency for privately rented property in England and Wales. From April 2018, landlords of privately rented domestic and non-domestic property must ensure that their properties reach at least an Energy Performance Certificate (EPC) rating of E before granting a new tenancy. From April 2020, the regulations will apply to all private rented properties, and from April 2023 to non-domestic properties. In 2019, the Government removed the 'no cost to the landlord' principle within the current regulations and implemented a cap on the required contribution from a landlord when upgrading their property to EPC Band E of £3,500.

Other policies

Changes to other policy mechanisms introduced this year include the Renewable Heat Incentive (RHI), Fuel Poor Network Extension Scheme (FPNES), the Feed-in-Tariff (FiT) and energy price caps.

FPNES

Ofgem have set out their initial proposals for how gas networks will be regulated in the coming years. Under the RIIO-2 framework, the fuel poor network extension scheme (FPNES) will continue into the next price control period (2021 – 2026).

However, GDNs will not be obliged to fund First Time Gas Central Heating as part of their obligation, which will need to continue to be sourced via alternative mechanisms. A new vulnerability licence condition will be added, embedding vulnerability into future business planning.

Feed-in-Tariff

The Government has announced several changes to the feed-in tariff scheme that has been incentivising small-scale renewable technologies like solar PV. As of 1st April 2019, there will be no feed-in tariff for small scale renewables (e.g. solar panels).

This will apply to any installations that do not gain accreditation before this date. Any accredited installations will continue to receive the FiT. The government has also stopped payments for energy exported from the house as of the same day.

Again, any installations accredited before 1st April will continue to receive the export payment. BEIS has consulted on a replacement payment whereby suppliers will be mandated to offer an export tariff to their customers. This will have to be greater than £0.00 for all periods and the customer must have an export meter (e.g. SMETS 2).

Whilst it's positive that installations will no longer be funded through regressive levies on energy bills, there may be implications for community energy projects and for battery storage.

Price caps and safeguard tariffs

In Jan 2019 Ofgem released details of a new price cap on standard variable tariffs (in place until 2020), which limit the unit rates and standing charges that suppliers can charge on their default tariffs. These limits are determined through detailed estimates of wholesale, network and policy costs, as well as a stretching supplier operation cost, designed to allow a small profit per customer for “efficient” suppliers.

These costs are assessed every six months, meaning that the level of the cap could change twice a year. It is likely that the cap will increase in April 2019. Prepayment customers are covered by a separate cap (the safeguard tariff). BEIS identifies the PPM Cap as being a key contributing driver of the slight reduction in fuel poverty levels in 2017.

Domestic Renewable Heat Incentive (RHI)

The RHI provides payments to householders to offset the cost of installing low carbon heating systems in their homes and is funded through taxation.

The way the scheme operates (offers ongoing payments rather than grants, for example), means it has had limited benefit for fuel poor households, given that higher income households are more likely to afford the upfront costs.

The CCC, in their advice to the UK Government on how to meet carbon budgets and mitigate impacts on fuel poverty, recommend that the RHI be targeted and made more accessible to low-income and fuel-poor households.

Despite the UK Government committing in 2016 to target the RHI on fuel-poor households, it has of yet failed to deliver on this pledge and the scheme is expected to end in 2020.

Case Study: Using existing mechanisms to deliver support to households

Seasonal Health Intervention Network:

Islington Borough Council's Seasonal Health Intervention Network (SHINE) is a single-point-of-referral network, which brings together over 30 local services to support those in or at risk of fuel poverty⁶.

Mrs M is an older resident on a very low income who has recently suffered a bereavement. She has multiple health conditions and was living in a cold and damp home. With the help of her neighbour, Mrs M contacted SHINE for support with her energy bills.

I couldn't keep my house warm as it is very draughty. I've had a hard time recently. My son passed away, I was diagnosed with Chronic Obstructive Pulmonary Disease (COPD) and I have had a lung removed. I need to keep my house warm due to my health. My energy company kept hiking up the monthly cost which left me in tears. The stress was too much. I've had to sell jewellery to cover the cost of things.

Thankfully I no longer worry about this due to SHINE's help. I feel more in control. They set up a payment plan for me, got me a discount on the water and gave me a home visit.

I also received a small grant that helps towards a small fuel debt. I felt like I finally had someone in my corner".

Mrs C is an older resident with multiple health conditions. She contacted SHINE after her boiler broke leaving her without access to heating or hot water:

"In 2014, I was diagnosed with osteoarthritis in my spine and was unable to work. My health has gotten a lot worse since and I have been diagnosed with COPD, an underactive thyroid, arthritis throughout my whole body and suspected angina. In March 2019, my gas boiler broke and I was left without hot water or heating.

This had a big impact on my health and made my arthritis and breathing difficulties much worse. I was heating water in a saucepan so I could have a wash. In March it was really, really cold and sometimes it took ten days for me to wash. It was a big, big, big effort and sometimes just not possible as it was such a struggle.

I was unable to keep my home warm and was experiencing high levels of pain. SHINE sent out a contractor in April who conducted a full survey to price the job. Scaffolding was needed to access my flat, but the ECO grant was not enough to cover the costs of the work.

I couldn't afford to pay the difference but SHINE topped up the funding which covered the full cost of the installation. It made a huge difference. I don't know how to thank them. I couldn't believe it when SHINE called to say they had the funding, I was just crying".

6. Established in 2010, SHINE utilises a range of initiatives to deliver assistance to households. This includes funding provided through Warm Home Discount Industry Initiatives and funds provided through the Mayor of London's Warmer Homes Scheme, which facilitates home improvements. ECO is used to provide loft and cavity wall insulation and replacement boilers for eligible households. Islington Council are also the lead ECOFlex authority for London and currently sign declarations on behalf of 25 local authorities across London, who are without a statement of intent. To date, 281 declarations have been issued. SHINE takes a holistic approach in providing support and delivers a range of interventions

Case Study: Limits of existing mechanisms on supporting households in need

Properties that are off the gas grid are often the most expensive to heat with the poor energy efficiency. Under RII0's Fuel Poor Network Extension Scheme (FPNES), Gas Distribution Networks (GDNs) eligible households can be connected to the grid free of charge. An evaluation of a GDN's FPNES has identified challenges around eligibility for support, the appropriateness of measures and local authorities not having a published Statement of Intent for ECO Flex.

Joyce is 84 years old, suffers from high blood pressure which affects her balance and spent approximately £2,000 per year on electricity. She lives in an area covered by two local authorities and applied for a gas connection under the (FPNES). However, the local authority who covered the side of the street she lives on did not have a Statement of Intent for ECO Flex. She contacted a third-party support service who informed her that as she had savings of £6,000 and an income of £10,000, she was not fuel poor and was therefore ineligible for support. National Energy Action (NEA) contacted the GDN overseeing the FPNES and found out it would cost £640 to connect Joyce to the network. Joyce was unable to afford this as she was on a basic pension and her savings were to cover her care and funeral costs. NEA liaised with the GDN and agreed to contribute half of the costs of the extension if the GDN could contribute the remainder. As a result, Joyce was able to receive her gas connection for free, and also benefited from further support from NEA.

Mr. P, a veteran in his 80s, lives in an old and uninsulated Victorian end-terraced property. His energy costs are unaffordable and as a result he has stopped using his coal fire and has incurred debt with his electricity supplier. As Mr. P lives over a mile from the gas network, his property is unable to be connected. He is eligible for support through the Energy Company Obligation (ECO) and would benefit most from an oil boiler however

he has only been offered an Air Source Heat Pump. This heating system is felt to be inappropriate for Mr. P as the controls are too confusing, and the system would not keep his whole property warm without him incurring high energy costs.

Lessons learned and observations for the future

Respondents highlighted several lessons for future adaptations to the Fuel Poverty Strategy for England. These included:

- Taking a more holistic approach to tackling fuel poverty, including action on health inequalities, poverty, water poverty, and whole-house solutions to get to a Band C
- Improving support for households on the brink of fuel poverty, who are one or two crises away from slipping in to it
- Delivering more support to rural, hard-to-treat properties
- Considering just approaches to decarbonisation that simultaneously address fuel poverty
- Giving a greater emphasis to the positive and preventative impact of interventions, rather than cost
- Enabling behaviour change and empowering households to take charge of their energy use
- Improving mechanisms for identifying and targeting fuel poor and vulnerable households
- Providing sufficient, stable and long-term funding to drive energy efficiency improvements and the revenue costs associated with working with vulnerable and fuel poor households

The overriding message from stakeholders was that it is essential that changes to practice, rather than principles alone, are made going forward.

RECOMMENDATIONS FOR ENGLAND

1. The UK Government should introduce a new Clean Growth ‘fuel poverty challenge fund’ by the end of 2019-20, as recommended by the Committee on Fuel Poverty 2018 Annual Report and providing necessary central investment to meet the near-term fuel poverty milestones. This would amount to a £1bn fund running from 2019 to 2021 to help the poorest households through: an area-based energy efficiency scheme, a rural-only energy efficiency scheme, and a health-based energy efficiency scheme.
2. The UK Government must take steps to make the Renewable Heat Incentive (RHI) accessible to fuel poor households and to ensure the distributional impacts of the policy do not place additional strain on low-income households.
3. The Warm Home Discount scheme must continue beyond 2021 and ensure more low-income working families receive support automatically.
4. The UK Government to introduce tax-based incentives for landlords who exceed minimum standards under MEES, to enhance co-operation on improving energy efficiency within the private rented sector. Private landlords should also be required to fund energy efficiency improvements up to a cost cap of £5,000 per property to bring as many properties up to EPC band E in time for the backstop date of 2020.
5. The Energy Saving Advice Service (ESAS) should be reintroduced and government should also urgently consider a new bespoke ‘extra help scheme’ to deliver targeted support during and after the smart meter roll-out.
6. The UK Government should consult on the MEES trajectory to bring it in line with the fuel poverty strategy target of bringing as many properties as is reasonably possible up to an EPC Band C by 2030.
7. BEIS, the Department for Health and Social Care (DHSC) and Public Health England (PHE) must ensure the Better Care Fund, or its successor helps low-income households with long-term respiratory or circulatory health conditions receive priority assistance for preventative energy home improvements.
8. NEA calculates a fuel-poor lone parent faces a gap of £9,331 and a fuel-poor couple with children faces a gap of £6,516 between their incomes and the essential cost of living. The UK Government must end the ‘freeze’ and uprate working-age benefits to complement other action to increase incomes.
9. Obligated ECO suppliers must uphold their obligations to treat customers fairly and respond to enhanced needs when delivering ECO and smart meter obligations. This includes highlighting how other forms of supplier-led assistance can be accessed if the most vulnerable fail to benefit from energy saving measures under the scheme.
10. Ofgem should introduce minimum standards for compulsory energy efficiency advice when GDNs (or their contractors) complete a connection under the Fuel Poor Network Extension Scheme (FPNES), similar to the Smart Meter Installation Code of Practice (SMICOP) for smart meter installations. We support proposals for vulnerability principles to lie within standard licence conditions. This would ensure all network companies are required to identify and act on vulnerability in a similar way that is required of all licenced energy suppliers.
11. The UK Government and, in turn, Ofgem, should cultivate a workable set of incentives which ensure the role of energy network companies in facilitating and funding energy efficiency.

SCOTLAND COUNTRY REPORT

A fuel poverty strategy for Scotland

In June 2019 the Scottish Parliament passed the Fuel Poverty (Targets, Definition and Strategy) (Scotland) Bill which received Royal Assent in July 2019. Part of the function of this legislation is for Scottish Ministers to prepare a Fuel Poverty Strategy. Unfortunately, this may take some time as this is set to happen up to one year after Section 3 of the Act comes into force, and there is no firm date yet for Commencement regulations to be published.

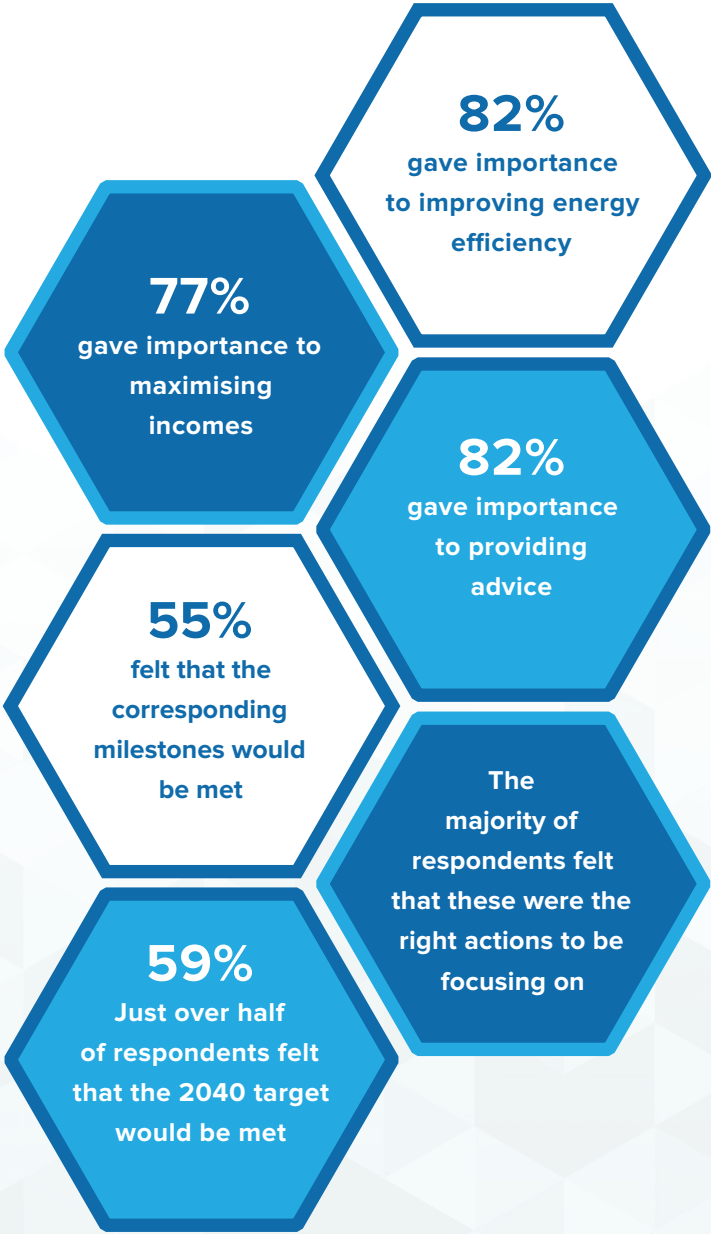
Feedback from our Call for Evidence in Scotland^{7, 8} said the strategy would only be useful if timescales are shortened. The initial recommendation from EAS and other organisations during the Bill Stage 1 evidence sessions was that 2040 as a target for reducing fuel poverty to 5% meant that this was condemning another generation of people to living in fuel poverty, and EAS backed amendments by Scottish Labour intent on bringing the target date forward to 2032. This, unfortunately, fell at Stage 2 and again at Stage 3.

There are additional interim targets or milestones to be achieved on the route towards eradication of fuel poverty. As well as the final target date of 2040, there are now two statutory interim targets, one at 2030 and one at 2035, with sliding scales for the reduction of households in fuel poverty, extreme fuel poverty and the fuel poverty gap.

The main aims of the new Fuel Poverty Act are to set targets to eradicate fuel poverty, put in place a new fuel poverty definition and to prepare a fuel poverty strategy.

The Scottish House Condition Survey statistics for 2017 show that 613,000 (24.9%) households in Scotland are in fuel poverty and 174,000 (7%) are in extreme fuel poverty. There was no significant difference in the fuel poverty rate between 2016 and 2017.

Excess winter deaths are measured by the National Records of Scotland and show that the Increased Winter Mortality (Excess Winter Deaths) figure for Scotland in 2017/18 was 4,800. It was noted that respiratory diseases were the main cause of additional deaths in 2017/18.



7. Due to events overtaking this Call for Evidence, many of the points made by survey respondents were actually dealt with in both Stage 2 and 3 amendments to the Fuel Poverty Bill.

8. The Call for Evidence in Scotland was sent out to approximately 200 stakeholders and a total of 23 responses were received, representing an 11.5% response rate. Responses were from the third sector (30%), housing providers (135), local authorities (13%), distribution companies (13%), installers (9%), energy suppliers (4%) and other organisations (17%).

The draft Fuel Poverty Strategy Scotland was published on 27th June 2018⁹ and contains a number of actions that the Scottish Government plans to take to eradicate fuel poverty.

These include:

- Improving energy efficiency through area-based and national fuel poverty programmes;
- Improving energy efficiency by introducing new standards for all tenures;
- Providing advice and support to householders on energy efficiency and affordability;
- Maximising incomes.

Other actions highlighted in the draft Strategy include:

- Through Energy Efficient Scotland, to invest in making homes – in all tenures – warmer, greener and more efficient, as part of the commitment to remove energy efficiency as a driver for fuel poverty
- To undertake a review of the scheme eligibility for Warmer Homes Scotland, taking account of the new fuel poverty definition in order to target support at those who need it most
- To consider the development of a fuel poverty assessment tool
- To ensure that the long-term Strategy takes account of those with lived experience of fuel poverty by consulting with people with that lived experience when making any regulations under the new Fuel Poverty Act.

As part of amendments that EAS backed during Stage 2 of the Fuel Poverty Bill, the Fuel Poverty Strategy will be revised every five years by Scottish Ministers and if they decide not to revise it, they need to publish an explanation saying why they have chosen not to do so.

Respondents to our Call for Evidence felt that meeting the target and milestones could be helped by:

- **Making better use of real, rather than modelled, data**
- **Consistency of funding for frontline fuel poverty and energy advice services**
- **Having a greater focus on property and heating types and geographies where fuel poverty is most prevalent**
- **More focus on resources**
- **Closer partnership working**
- **Clear and concise planning**
- **Face-to-face advice through home visits by trusted local organisations to identify those in real need**
- **Identifying more cost-efficient technologies and helping to diversify skills responsible for maintenance of new technologies**

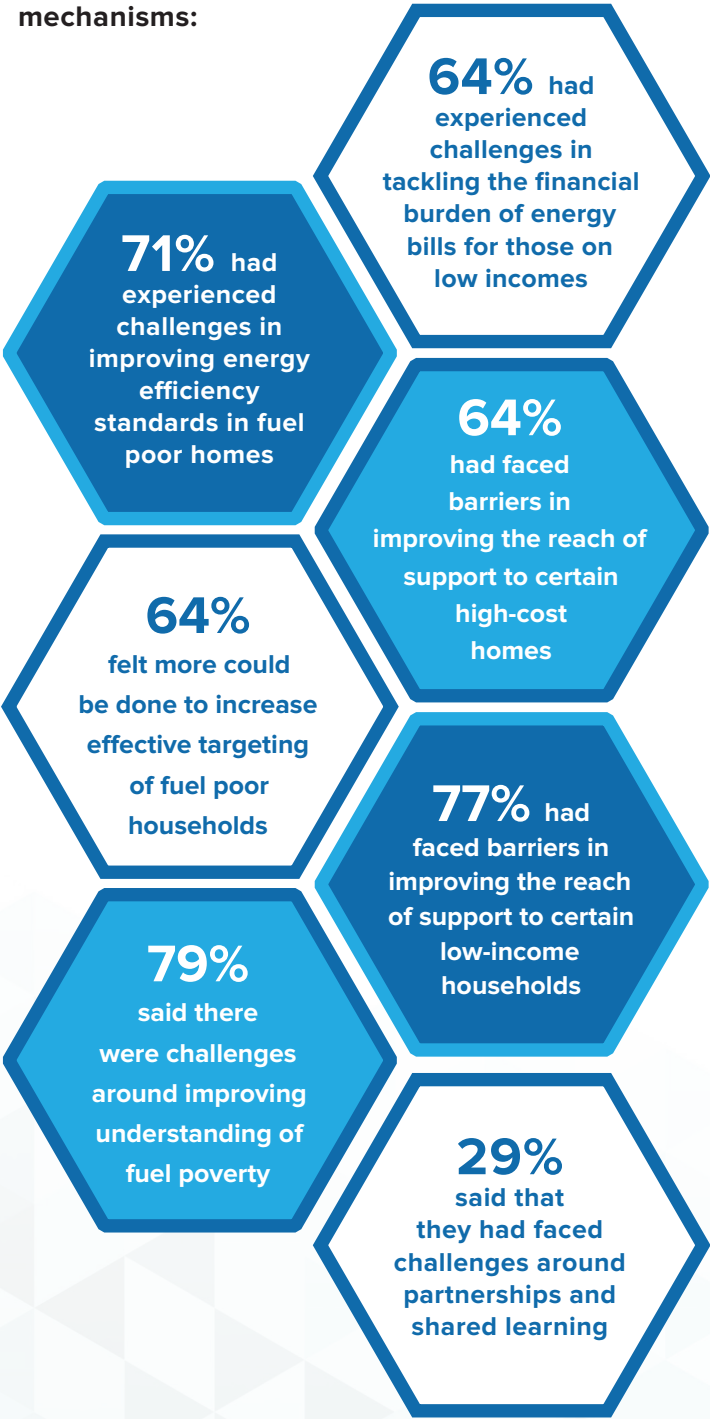
Responses noted that the introduction of new energy efficiency standards for all tenures could be better adapted by setting more realistic and achievable targets (this aim was echoed by the Minister for Local Government, Housing and Planning, Kevin Stewart when discussing fuel poverty targets throughout the scrutiny of the Bill).

Others, however, felt that the targets were too far away and didn't create a sense of urgency. Some felt that there needed to be more regulation around energy suppliers and that proper investment was needed in local projects.

Respondents highlighted that there needs to be action correlating to all four drivers of fuel poverty and proper resourcing of these actions.

9. Scottish Government, Draft Fuel Poverty Strategy for Scotland 2018, June 2018

Respondents did note some key barriers or challenges to addressing fuel poverty using current available mechanisms:



Specific barriers included:

- Frontline workers’ views as a group are not taken into account when feeding into consultations, despite having insights which should be accounted for
- Energy suppliers needing to do more to implement the new ECO3 focus on the fuel poor
- The emphasis on ‘fabric first’ over ‘folk first’ approaches to tackling fuel poverty
- Using EPCs (as they are currently produced) as drivers for improving energy efficiency
- Limited understanding by policymakers of the issues faced on the ground, and the lived experience of those in fuel poverty
- Lack of resources to address fuel poverty and deliver appropriate advice and face-to-face support to households
- The current poor standard of the housing stock and the cost of work required to improve hard-to-treat properties
- The high cost of energy coupled with low incomes
- Difficulties in delivering support to off-gas and rural households

“the introduction of new energy efficiency standards for all tenures could be better adapted by setting more realistic and achievable targets”

Defining fuel poverty in Scotland

The new fuel poverty definition (slightly changed from the first iteration of the Bill) now says that a household is in fuel poverty if –

- (a) The fuel costs necessary for the home in which members of the household live are more than 10% of the household's adjusted net income, and
- (b) After deducting such fuel costs, benefits received for a care need or disability (if any) and the household's childcare costs (if any), the household's remaining net adjusted income is insufficient to maintain an acceptable standard of living for members of the household.

Almost half of respondents to the Call for Evidence felt that the proposed new definition would be generally effective at defining and identifying households in (or vulnerable to) fuel poverty and that it was “broad enough to include a wide range of circumstances”^{viii} and will also help to give a true picture of fuel poverty.

However, some felt that the amount of information that will need to be collected from each household would be problematic due to the amount of time this might take and others raised the point that there should be a Scottish definition of vulnerability included in the definition. It may add complexity when working across borders and will be difficult to explain for immediate identification of those in fuel poverty.

Existing available mechanisms for addressing fuel poverty in Scotland

Home Energy Efficiency Programmes for Scotland (HEEPS)

The Scottish Government offers various schemes which are intended to support people who have difficulty paying their bills or keeping their homes warm. These schemes are known as Home Energy Efficiency Programmes for Scotland (HEEPS) and these will continue to be delivered under Energy Efficient Scotland¹⁰.

In the 2019/2020 budget, these schemes' budgets were allocated as: Area Based Schemes (£49m); Warmer Homes Scotland (£24m); Home Energy Scotland and other relevant loan schemes (£30m); energy efficiency and fuel poverty advice services (£10.6m). The funding allocated for these schemes has not increased significantly recently and we hope that when Energy Efficient Scotland is fully operational that funding matches ambition.

Respondents to the Call for Evidence feel that HEEPS has helped facilitate solid wall installations; also it has worked well by enabling Scottish Government and private sector partnering and engagement. Challenges highlighted by respondents for the delivery of HEEPS programmes include the difficulty of delivering in mixed-tenure blocks of flats and individual owners' ability to veto the work thus disadvantaging others within their block.

Energy Company Obligation (ECO)

The Energy Company Obligation (ECO) is a government energy efficiency scheme in Great Britain aimed at reducing carbon emissions and tackling fuel poverty.

Although 50% of respondents to the Call for Evidence felt that current attempts to deliver ECO3 support to rural households are generally effective, they did say that ECO3 is too complex and difficult to deliver especially so in rural households with complex needs.

Challenges of delivering ECO3 support were that material costs of work have increased and this makes rural delivery even more difficult, and one respondent noted that there is no cognisance to property types and remote rural working. 75% of stakeholders felt that flexible eligibility criteria under ECO3 was generally ineffective in reaching households in or at risk of fuel poverty however positives were that ECO flex had allowed for the continuation of the HEEPS: ABS programmes, and that there are many households now that can be supported who would not previously have received measures.

Warm Home Discount (WHD)

Warm Home Discount rebates are hugely important particularly for older people and vulnerable low-income households. 53% of respondents to the Call for Evidence indicated that they had applied for or accessed the Industry Initiatives part of the WHD scheme.

Examples given of how WHD Industry Initiatives schemes have enabled the support of households in or at risk of fuel poverty include Energy Best Deal. This is a scheme which is funded entirely by WHD Industry Initiatives and is delivered by CABs in Scotland annually.

The scheme provides advice to consumers around energy deals and assistance with switching supplier. Other responses detailed a wide range of schemes tackling fuel poverty in a variety of ways to ensure nationwide coverage and a holistic way of supporting those experiencing difficulties.

Some of the challenges faced by respondents are that the application process is quite bureaucratic and delivery windows are very short, and another respondent noted that it never seems enough to fully tackle fuel poverty.

Winter Fuel and Cold Weather Payments

These payments will be delivered under the Social Security (Scotland) Act 2018 and will be renamed as Winter Heating Assistance and Cold Spell Heating Assistance respectively.

The Scottish Government has committed to pay Winter Heating Assistance to families with a severely disabled child although unfortunately it may be some time before this is fully operational. Both of these benefits are expected to be paid out in Scotland from November 2021.

Case Study: *Using existing mechanisms to deliver support to households*

Greener Kirkcaldy is a community-led charity and development trust working on a local scale to benefit people and the environment they live in. They would like to see a future where everyone is able to heat their home affordably, eat well, and tread more lightly on the planet. Greener Kirkcaldy works towards that by delivering projects to meet the needs and aspirations of local people: tackling fuel and food poverty, protecting and enjoying the environment, and bringing the community together.

Mr and Mrs N are a middle-aged couple who live in suburban Dunfermline. Mrs N sustained a lifechanging injury and as a result she can no longer do paid work. Mr N was made redundant from his long-term teaching job and now has short-term work on a reduced income. Mr and Mrs N were interested in trying to save money, including on their energy use and requested a home visit from the Cosy Kingdom Energy Advice Service.

After Mr and Mrs N explained their circumstances - reduced income and health issues – a referral was made to Citizens Advice and Rights Fife (CARF) as Mr and Mrs N might qualify for a health-related benefit. During the home visit the advisor noticed that they had an old, inefficient heating system. If they were awarded a relevant benefit, they may qualify for a new heating system through the Home Energy Scotland (HES) Warmer Homes Scotland scheme. The advisor also noted that Mr and Mrs N were on a high tariff. The advisor checked this by completing an energy comparison and found a more competitive energy supplier for both gas and electric.

Through support from CARF, Mrs N qualified to receive Personal Independence Payment (PIP), which allowed the advisor to make a referral to Home Energy Scotland (HES). Mr and Mrs N qualified for a grant for a new heating system under the Warmer Home Scotland scheme.

10. Energy Efficient Scotland is the main delivery vehicle for the Fuel Poverty (Targets, Definition and Strategy) (Scotland) Act 2019. It aims to remove energy efficiency as a driver of fuel poverty.

Once the new gas central heating system, including a combi boiler, radiators, pipework and controls, had been installed through Warmworks, the advisor showed Mr and Mrs N how to use all the heating controls efficiently, including the boiler temperatures, programmer, wall thermostat and radiator thermostats. Mr and Mrs N were delighted with the outcome. Their income has increased, and their home is being heated more efficiently but at lower cost.

Case Study: Limits of existing mechanisms on supporting households in need

Founded in 2013, Citrus Energy is a social enterprise that exists to help domestic and commercial energy consumers make genuine savings on gas and electricity costs through impartial advice and recommendations. As a social enterprise, any profit achieved is redistributed into the community to help reduce fuel poverty issues and create sustainable employment.

Mr & Mrs B were referred to Citrus Energy in 2014. They had no working heating in their property. It was established that they would qualify under the Scottish government scheme to have a new heating system. It was Mr B who approached Citrus initially. Citrus attempted to arrange a home visit but Mr B said his wife had issues with people coming to the house, so they saw him in the office and made a referral to Home Energy Scotland (HES) to progress the application.

They were successfully put forward for the scheme but when it came to a survey access could not be gained due to Mrs B's mental health conditions and the application was rejected. One of Citrus Lemon aid¹¹ team continued to liaise with Mr B.

The following year Mr B disclosed that his wife was a hoarder. This was affecting Mr B's own mental health as they had not had heating for several years. A home visit was arranged,

and another referral was made to HES. Again, they were accepted on to the scheme. This time Citrus attended with the surveyors and discovered the situation with hoarding was much worse than expected.

They were approved for the scheme, but the work could not be carried out. Advice was given to Mr B to seek professional help for his wife. He was also advised to clear the property and Citrus would try again to get assistance with heating to the property. They stopped engaging.

The following year, Mr B attended their office in a poor state. He had taken to riding buses all day for heat and his own mental health was declining. At this point Citrus referred to social services for intervention. Social Services attended the property and because of public health issues intervened. Some clearance was carried out and they were referred back to Citrus and in turn HES. By the time the survey was carried out the house had reverted to its previous state.

This year, Citrus made another referral and working with the couple, social services and Warmworks CLO, they managed to engage Mrs B and with weekly visits over a period of months were able to persuade her to address the issue and hire a skip.

Lemon Aid maintained contact weekly and sometimes daily with them until the house was clear. The survey was carried out recently and it has been deemed safe for contractors to work in. The installation is next week.

Without this multi-agency approach this couple who had been without heating or hot water for over 8 years would continue to be so. This case though extreme, demonstrates the value of partnership working.

11. Citrus Energy Lemon Aid offers a home visit advice service to specifically help the people of Ayrshire, including those with prepayment meters. http://citrusenergy.businesscatalyst.com/lemon_aid.html

Response from key agencies¹²:

The Scottish Government

"The Scottish Government does not have control of all the levers to eradicate fuel poverty in Scotland. Out of the main drivers, it does not have control over the energy market and therefore the costs of energy. The Scottish Government does have control over energy efficiency, and it has invested a significant amount of funding in the fuel poverty/energy efficiency programmes. It also now has some control over social security through the Scotland Act and through that, works to maximise people's incomes.

The current focus is on the regulations that need to be made under the Fuel Poverty (Targets, Definition and Strategy) (Scotland) Act 2019 (regulations on the enhanced heating regime, the remote rural, remote small town and islands uplift and the new statutory Fuel Poverty Advisory Panel). The Scottish Government will then look to do further work on the Fuel Poverty Strategy.

Consultation on the Strategy is an ongoing process and the Government are already discussing issues with the Fuel Poverty Advisory Panel and Partnership Forum. All of this builds on the consultation in 2018 on the draft strategy. The Scottish Government is committed to continuing to work with stakeholders as the Strategy is developed.

In terms of actions being delivered on the ground, actions are already delivered towards meeting fuel poverty targets by HEEPS: Area-Based Schemes at a local level and Home Energy Scotland (HES) delivers over 5 regions. It is likely that the actions of the new Fuel Poverty Strategy will be practically delivered by stakeholders at a local level, there is already good partnership working and that will continue.

Key barriers in meeting the targets are the fact that the Scottish Government doesn't have control of all the drivers to eradicate fuel poverty and also wider issues like Brexit as this is likely to have a huge impact on the economy and people's jobs.

The new fuel poverty definition aligns fuel poverty more closely with income poverty which is important in terms of targeting resources where it is needed most.

Given that the final Fuel Poverty Strategy is not due until later in 2020 it is difficult to say how different it will be from the draft Strategy. It will very much be based on it and the feedback received through the consultation last year."

"the Scottish Government doesn't have control of all the drivers to eradicate fuel poverty and also wider issues like Brexit as this is likely to have a huge impact on the economy and people's jobs."

¹². EAS wrote to the Fuel Poverty Team at the Scottish Government and carried out a qualitative interview with them

Lessons learned and priorities for the future

This is a tense time for Scotland as we wait for the regulations to be published from the Fuel Poverty Act. This is the first time that Scotland will have a Fuel Poverty Strategy, however lessons need to be learned from the previous target of ending fuel poverty by 2016, which was not met for many reasons, including inadequate funding.

Carrying out the Call for Evidence and looking at the Fuel Poverty Strategy at this particular point in time was very useful as the respondents picked up on some issues which had been dealt with in the process of the scrutiny of the Fuel Poverty Act but there are also some points missing that could perhaps be picked up in the new Fuel Poverty Strategy.

Examples of the main priorities for stakeholders were:

- Having ambitious, well-funded targets
- Consistency of funding for energy advice projects and longer-term funding, including the resources to carry out energy advice projects
- More support for organisations working on the front line with vulnerable people
- Closer partnership working
- Recognition and positive action around the cross-portfolio nature of the Fuel Poverty Strategy

EAS has long called for better funding of the Scottish Government's fuel poverty programmes; a 'business as usual' approach will not suffice, especially with new statutory interim targets for reducing fuel poverty. One of the most important challenges identified by stakeholders in the Call for Evidence was improving energy efficiency standards in fuel-poor homes.

The Scottish Government are consulting with stakeholders during summer 2019 on a statutory instrument for energy efficiency standards in private rented property so this issue is moving forwards, albeit very slowly.

RECOMMENDATIONS FOR SCOTLAND

1. The Scottish Government must publish, lay and pass a properly resourced and timely Fuel Poverty Strategy for Scotland, including relevant regulations from the Fuel Poverty (Targets, Definition and Strategy) (Scotland) Act 2019
2. Warmer Homes Scotland funding should be scaled up and eligibility reviewed to match current policy
3. All four drivers of fuel poverty must be resourced via the Fuel Poverty Strategy
4. Fuel poverty programmes should report on impact, rather than focusing on the amount of measures installed
5. The Private Rented Sector standard, part of Energy Efficient Scotland, must come online sooner rather than later, with enough feed-in time for the industry to be able to respond effectively
6. There must be a proper assessment made of the new technologies proposed for Energy Efficient Scotland. These technologies are being relied upon by Government to meet the fuel poverty targets, but it is essential that these are assessed in order to meet their potential
7. The Warm Home Discount Scheme (including the Industry Initiative strand) should continue beyond 2021. The Scottish Government should keep this under review and when appropriate should implement a Scottish version of this
8. The Scottish Government should ensure Scotland receives a proportionate share of ECO funding. They should also re-examine whether Scottish programmes could be better integrated with ECO

WALES COUNTRY REPORT

A fuel poverty strategy for Wales

The current Fuel Poverty Strategy, introduced by the Welsh Government in 2010, contains several mechanisms and targets to address fuel poverty which either no longer exist, or are now out of date.

The Welsh Government has committed to consult on a new fuel poverty plan in the autumn of 2019, with an updated plan expected to be published in early 2020.

The 2010 Strategy contained several key principles intended to tackle fuel poverty. These included:

- Focusing on those most in need
- Addressing fuel poverty through energy efficiency programmes
- Working with stakeholders to maximise the support and funding available to householders
- Improving and using data to review policy and actions
- Helping people pay less for energy

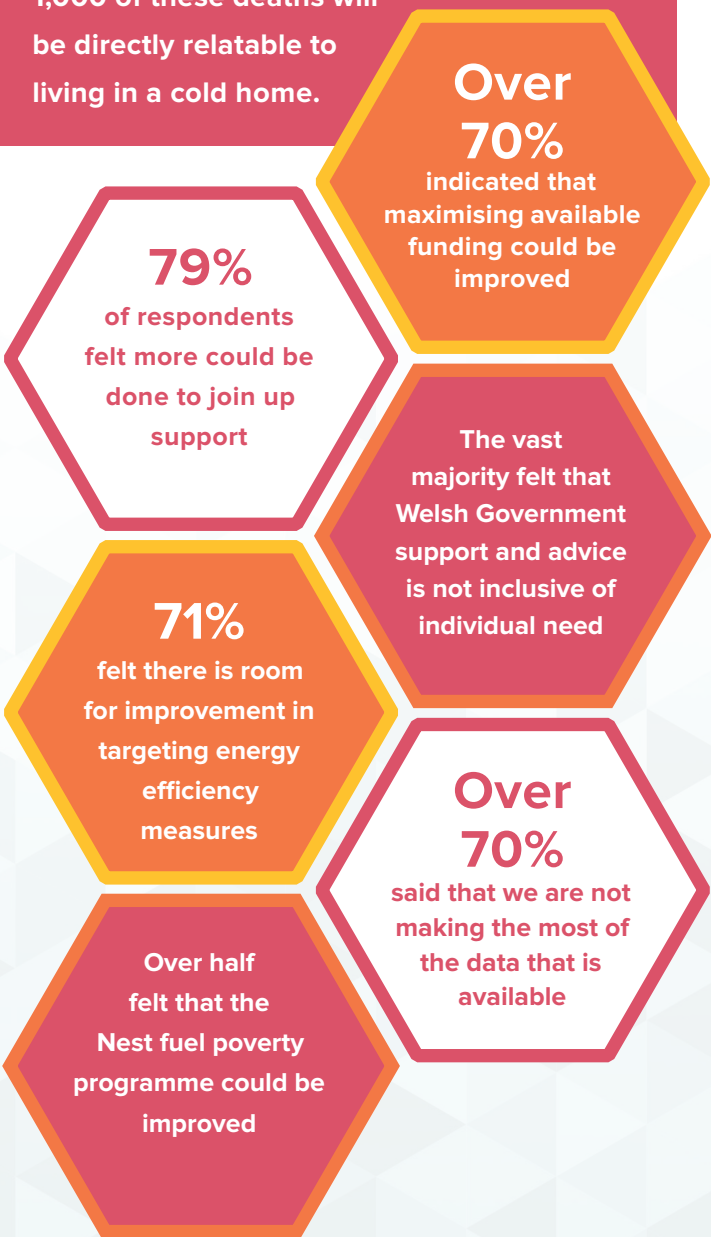
Whilst the majority of respondents to our Call for Evidence¹³ felt that the principles were the right ones to be focusing on, they did not feel that they had been fully delivered in practice.

Less than half (40%) of stakeholders felt that the demand-led all Wales Nest fuel poverty programme had been fully implemented, with only 21% stating that support had been joined up.

Just over a fifth (21%) felt that the support and advice was fully inclusive of individual need, and less than a third (29%) felt that support was fully targeted at those in most need. Only 20% felt that new data had been fully used to inform eligibility criteria.

The Welsh Housing Condition Survey shows that 155,000 households (12%) in Wales were living in fuel poverty in 2018. There were 32,000 households (2%) living in severe fuel poverty, the majority of which were considered vulnerable. The percentage of households estimated to be in fuel poverty in 2018 has decreased from 26% in 2008. Initial indications show that this reduction is a result of increased household incomes and reduced household energy requirements: energy efficiency improvements outweighed increases in fuel prices.

The number of excess winter deaths in Wales reached 3,400 in 2017/18, the highest on record since the winter of 1975/76. Over 1,000 of these deaths will be directly relatable to living in a cold home.



Fuel Poverty Targets

The Welsh Government’s 2010 Fuel Poverty Strategy aimed to eradicate fuel poverty for vulnerable households by 2010; in social housing by 2012; and to eradicate fuel poverty for all households in Wales by 2018. None of these targets were achieved. It is not yet known whether the Welsh Government will set targets in the new fuel poverty plan; however, the overwhelming majority (93%) of respondents to our call for evidence felt that the Welsh Government should. It was felt that setting targets would give a unity of purpose and keep a focus on tackling the issue.

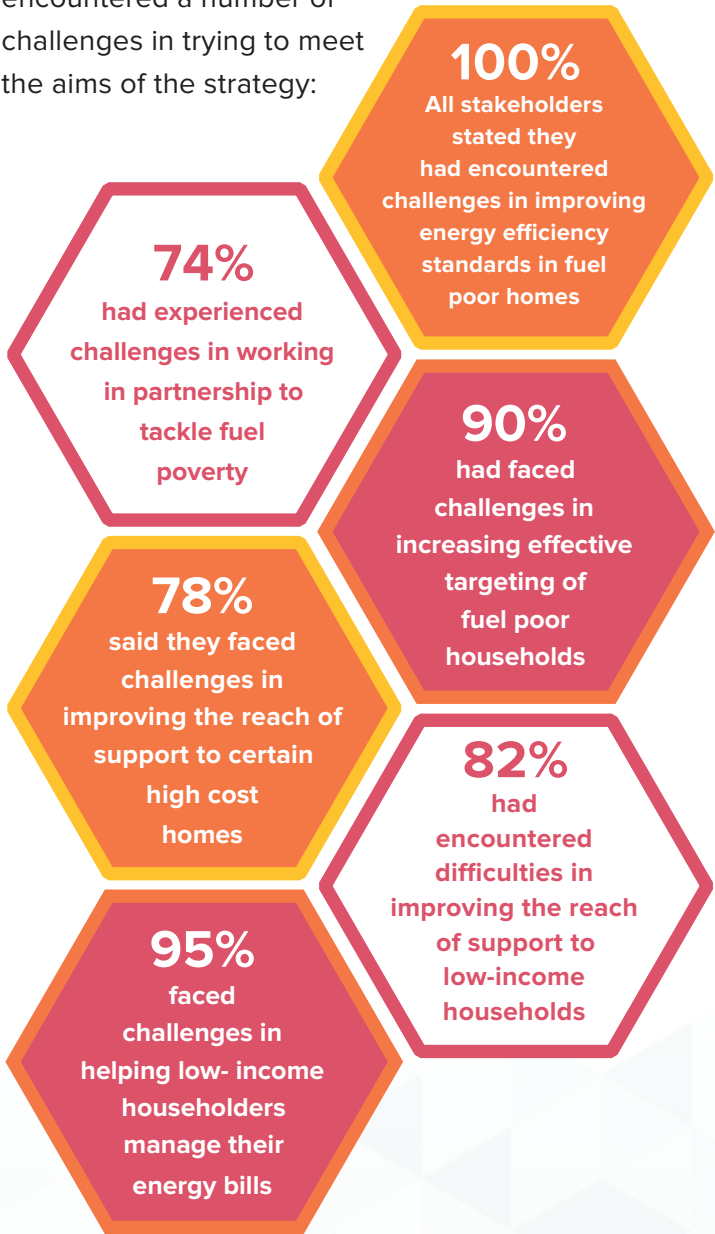
Positives

In our call for evidence stakeholders identified the following which has helped to deliver the aims of the strategy:

- **Collaboration across the sectors to make sure households can access all the services they require**
- **Being able to provide holistic advice that includes income maximisation support**
- **Referring households into local sources of support and to the most appropriate provider**

Challenges

However, the majority of stakeholders also encountered a number of challenges in trying to meet the aims of the strategy:



13. The Call for Evidence in Wales was distributed to c.200 stakeholders. In total, 30 responses were received, representing a 15% rate, approximately. Respondents represented: the third sector (40%); housing providers (20%); local authorities (17%); Welsh Government (7%); Community Interest Companies (7%); and other organisations (10%) – namely private companies or funded schemes

Stakeholders identified a number of barriers in meeting the aims and targets of the strategy which included:

- Eligibility criteria limiting support that can be delivered to households in need but who are not in receipt of means-tested benefits
- Geographical targeting using the Welsh Index of Multiple Deprivation can miss households in rural locations who are in need of support
- Difficulties in improving standards in the existing housing stock especially for rural and hard-to-treat properties and those in the private rented sector
- Limited opportunities to access funding sources
- Complexity of existing schemes can limit someone's ability to access support

Defining fuel poverty in Wales

With regards to how fuel poverty is defined in Wales¹⁴, over half of stakeholders (60%) surveyed felt that the 10% indicator is generally effective in defining and identifying households in, or vulnerable to, fuel poverty. The simplicity of the definition enabled them to support clients in applying for fuel poverty schemes, whilst others identified that it was useful in enabling households to think about budgeting and energy use. Overall it was felt to be easy to understand and administer.

Meanwhile, 40% of stakeholders felt that the 10% definition was ineffective, particularly in identifying households who are under-consuming energy or who had elevated heating needs due to health conditions.

Current available mechanisms for addressing fuel poverty in Wales

A key feature of the Welsh Government's approach to tackling fuel poverty in Wales is through funding for energy efficiency programmes¹⁵. Both the all Wales Nest and area-based Arbed schemes are still active under the Welsh Government's Warm Homes Programme. Another key feature of the current Fuel Poverty Strategy was to ensure that energy efficiency programmes were developed in a way that maximised the funding available from the UK Government, energy supplier programmes and other potential sources of funding (including the Energy Company Obligation, ECO)¹⁶.

14. In Wales, the 10 per cent definition of fuel poverty is used, which classifies someone as fuel poor if they have to spend more than 10 per cent of income (including housing benefit) on fuel in order to maintain a satisfactory heating regime. Where expenditure on all household fuel exceeds 20 per cent of income, households are defined as being in severe fuel poverty.

15. The 2010 Strategy committed to developing a new all-Wales demand-led fuel poverty scheme (subsequently called Nest) that would help individual householders to improve the energy performance of their homes and reduce the impact of fuel bills. The Nest scheme introduced in 2011 aimed to deliver energy performance improvement measures for householders living in severe fuel poverty. The scheme was designed to provide "something for everyone" and included energy efficiency advice for all households. As well as this demand-led scheme, the 2010 Fuel Poverty Strategy committed to pursuing an area-based programme which was established to deliver social, environmental and economic benefits through the improvement of household energy performance across tenures on a community by community basis.

16. The ECO3 scheme commenced in December 2018 and runs until 31st March 2022. The scheme will now be exclusively targeted at 6 million fuel poor, vulnerable and low-income customers. The new scheme also requires suppliers to meet 15% of their obligation through delivering measures in rural areas. There will be an uplift for measures delivered to low-income households living in F- and G-rated properties under the Flexible Eligibility part of the scheme. However, landlords with F/G properties will not be able to access this money, under MEES regulations. ECO3 will furthermore allow limited oil boiler delivery to take place within the broken heating system cap. Government have decreased the supplier threshold in a phased way to 150,000 customer accounts (or equivalent) from April 2020, meaning that more suppliers will be obligated to take part in the scheme, and more customers will receive measures.

Energy Efficiency Programmes

<p>Challenges</p> <ul style="list-style-type: none">• All respondents (100%) to our call for evidence felt that improving energy efficiency standards in fuel poor homes remained an obstacle. <p>Positives</p> <ul style="list-style-type: none">• The Welsh Government piloted a health conditions programme in 2017. It was designed to support current efforts to reduce the levels of illness and premature winter deaths made worse from living in a cold home. The pilot extended eligibility to enable the Nest scheme to support householders living on low incomes but not in receipt of income-related benefits, who also live with a chronic respiratory or similar health condition. This pilot has been extended to March 2020.	<p>Maximising ECO Resources for Wales</p> <ul style="list-style-type: none">• Half of respondents felt that ECO Flex has been generally effective in reaching vulnerable households in, or at risk of, fuel poverty, whilst half felt it had been ineffective. It was noted that broader eligibility criteria meant support could be delivered to more households in need, but that local authorities had to be proactive in publishing a Statement of Intent.• Stakeholders noted that whilst holding local publicity and community events could help promote the support available, attempts were being hindered by the high costs of improving some rural properties as well as a lack of engagement from households who mistrust cold 'ECO' callers.
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All respondents (100%) to our call for evidence felt that improving energy efficiency standards in fuel poor homes remained an obstacle.

Using existing mechanisms to deliver support to households: two case studies

One of the key principles of the Welsh Government's Fuel Poverty Strategy of 2010 is for programmes that aim to improve the energy efficiency of the home to provide long-term improvement in the quality of the housing stock, address fuel poverty, and reduce the carbon footprint.

A further feature includes the targeting of energy efficiency measures at households most in need. The following case studies demonstrate how the principles have both been effective in addressing the needs of fuel poverty, but also how they have failed to reach the most in need living in the most inefficient homes.

Case Study: Using existing mechanisms to deliver support to households

Mr Peters is in his 70s and lives with his wife in a semi-detached property in Chepstow. His property used to contain an aged heating system which was extremely inefficient, making it unaffordable for Mr Peters and his wife to keep warm.

As Mr and Mrs Peters owned their property and were in receipt of a means-tested benefit, they were able to apply to the Nest scheme for energy efficiency improvements. Melin Homes assisted the couple with the application where they were able to receive a new back boiler and full central heating system.

Mr Peters suffers from arthritis which was exacerbated by the cold. Since the home improvements he has noticed an improvement in both his physical health and mental well-being. Mr Peters is now able to afford to keep the heating on when it is needed.

Case Study: Current barriers to delivering support to vulnerable households

Mr and Mrs Jones, a couple in their 80s, live in a stone wall terraced property in Rhondda Cynon Taff. There is no working boiler in the property and therefore no heating or hot water.

Mr and Mrs Jones live in a single room where they wear coats for most of the day and huddle around a gas fire. This inefficient form of heating has resulted in extremely high and unaffordable energy bills. Mrs Jones has multiple health conditions, including mobility issues and is prone to trips and falls.

Mr and Mrs Jones do not qualify for Nest home improvements because they are not in receipt of a means-tested benefit. They have savings, but they have stated that this is to pay for their funerals. Mr and Mrs Jones have very low earnings, with no disposable income, and are unable to afford a new boiler.

Response from key agencies:

The Welsh Government¹⁷

"The Welsh Government has been consistent in its determination to tackle the causes of fuel poverty. It does not hold all the levers available to tackle the problem, for instance it has little influence over energy prices and only some influence over income. Where Welsh Government can look to ease the problem is through the quality of housing. Support has been consistent in this area, with large sums of money regularly being invested to better the energy efficiency performance of housing in Wales.

There are many challenges to tackling fuel poverty. The Welsh Government is working in a complex landscape, not least because Wales has the poorest housing stock in Western Europe. People fall in and out of fuel poverty very quickly, and the reasons for being in fuel poverty vary widely. When the Welsh Government formulated the Fuel Poverty Strategy in 2010, the levels of unemployment were higher. Much action was therefore targeted at those who were not working. Welsh Government has tried to be responsive by changing the eligibility criteria of its energy efficiency schemes, and this can be demonstrated by the health conditions pilot, which targets householders with health conditions that are exacerbated by the cold. A further challenge is trying to find the balance between supporting a larger number of households to a lesser degree, or a smaller number of households to a larger degree.

A particular area that the Welsh Government feels it can improve in the new plan is its influencing of the UK Government. Welsh consumers pay for certain policies, such as the Warm Home Discount and the winter fuel allowance. There is a role here for the Welsh Government to ensure that these policies are fair and proportionate. Furthermore, if the UK Government could be influenced to provide funding for fuel poverty schemes, Wales could benefit greatly.

The Welsh Government recognises that the target to eradicate fuel poverty for all households in Wales by 2018 was missed by some distance. The Government still feels that setting targets are

important; however, they would need to be both ambitious and achievable. If a new target were to be set in the new fuel poverty plan, the Welsh Government feels the provision of advice would need to be mobilised more effectively in order to reach this target. Stretched resources will need to go further and deeper, relationships with stakeholders would need to be strengthened, and the UK Government would need to be influenced to provide more support. The Welsh Government has no plans to redefine the definition of fuel poverty in Wales."

Observations and priorities for the future

Although some progress has been made in tackling fuel poverty in Wales, it has not gone far enough. The Welsh Government's Warm Homes Programme currently aims to improve the energy efficiency performance of 25,000 homes between 2017 and 2021. If this target is achieved, and all those that are targeted are living in fuel poverty, this still leaves c. 130,000 households in fuel poverty (if fuel poverty estimates remain the same).

One of the most important challenges that stakeholders identified to overcome in the future was improving the energy efficiency standards in fuel poor homes, with 70% identifying this in their top three challenges. Many felt that the eligibility of the Warm Homes Programme needed to be widened so that those on low incomes and not on a means-tested benefit could receive energy efficiency improvements. It is clear therefore that the positive aspects of the Warm Homes Programme need to be built on and expanded.

Many respondents to the call for evidence also felt that collaborative working was vital, particularly between housing associations, local authorities, and the third sector. An example of collaborative working includes local authority-led Affordable Warmth Groups which enable stakeholders to share information and best practice.

Moreover, Wales is one of the few nations without a Ministerial Advisory Body on Fuel Poverty. The role of the now defunct body was to provide expert advice and recommendations to the Welsh Government on

17. NEA Cymru wrote to the Fuel Poverty Team at the Welsh Government and carried out qualitative interview with them.

tackling fuel poverty in Wales, as well as examine the effectiveness of current policies and programmes. In addition, a Fuel Poverty Operational Group was to be developed to provide advice and guidance to the Welsh Government on the effective management and operation of its fuel poverty energy efficiency programmes. NEA Cymru was also contracted to assist the Welsh Government to develop and sustain effective stakeholder engagement and partnerships, support stakeholders in local delivery, as well as provide the evidence base to support the development of fuel poverty policy.

Currently, there is no mechanism in Wales to draw stakeholder representatives from the wide range of statutory, local government and housing associations, private sector, and third sector organisations together to help identify best practice and solutions, and to examine and review the effectiveness of current Assembly Government policies in delivering reductions in fuel poverty. It is evident that there is clearly a gap in the provision of advice and guidance to the Welsh Government to help direct, or redirect, current initiatives and programmes so they can be targeted at those most in need.

RECOMMENDATIONS FOR WALES

1. The Welsh Government should accept the recommendations outlined in The Decarbonisation of Homes in Wales Advisory Group to improve fuel poor homes to an energy performance standard of EPC Band A (SAP 90+) over the next 10 years.
2. The new fuel poverty plan should be designed in sync with the Welsh Government's plan to decarbonise Wales. It is essential that households living in fuel poverty are supported first.
3. The Welsh Government should review the eligibility criteria for its Nest scheme to consider how low-income households, not on means-tested benefits, and living in energy-inefficient homes can be assisted.
4. The Welsh Government should consider how it can support local authorities to help maximise funding for energy efficiency improvements via the ECO flexible eligibility scheme.
5. Funding for more holistic advice should be included within the new fuel poverty plan to include the provision of in-home visits offered to all households who call the Nest advice line for assistance.
6. Local authority-led Affordable Warmth Groups should be established to bring together multi-agency partnerships to co-ordinate action at a local level and share best practice.
7. The Welsh Government should publish and make available a Cold Weather Plan for Wales to address the burden of excess winter deaths and cold-related illhealth in the country.
8. A Strategic Monitoring Board should be implemented to monitor and oversee the delivery of the new fuel poverty plan and to bring together multi-sector partnerships to implement an accompanying Action Plan, as well as to review and report on progress. This should include representatives from the Welsh Government, members of the Fuel Poverty Coalition, cross-governmental departments, the voluntary sector, energy and network companies, Ofgem, local authority and housing association representation.

NORTHERN IRELAND COUNTRY REPORT

A fuel poverty strategy for Northern Ireland

Northern Ireland and the backstop continue to dominate the discussions around the UK's exit from the European Union and at the time of writing the current political impasse in the country remains unchanged.

This absence of high-level devolved policy-making has meant vital strategies including the long-awaited new Fuel Poverty Strategy and Northern Ireland Energy Framework remain in limbo to the detriment of local communities in need.

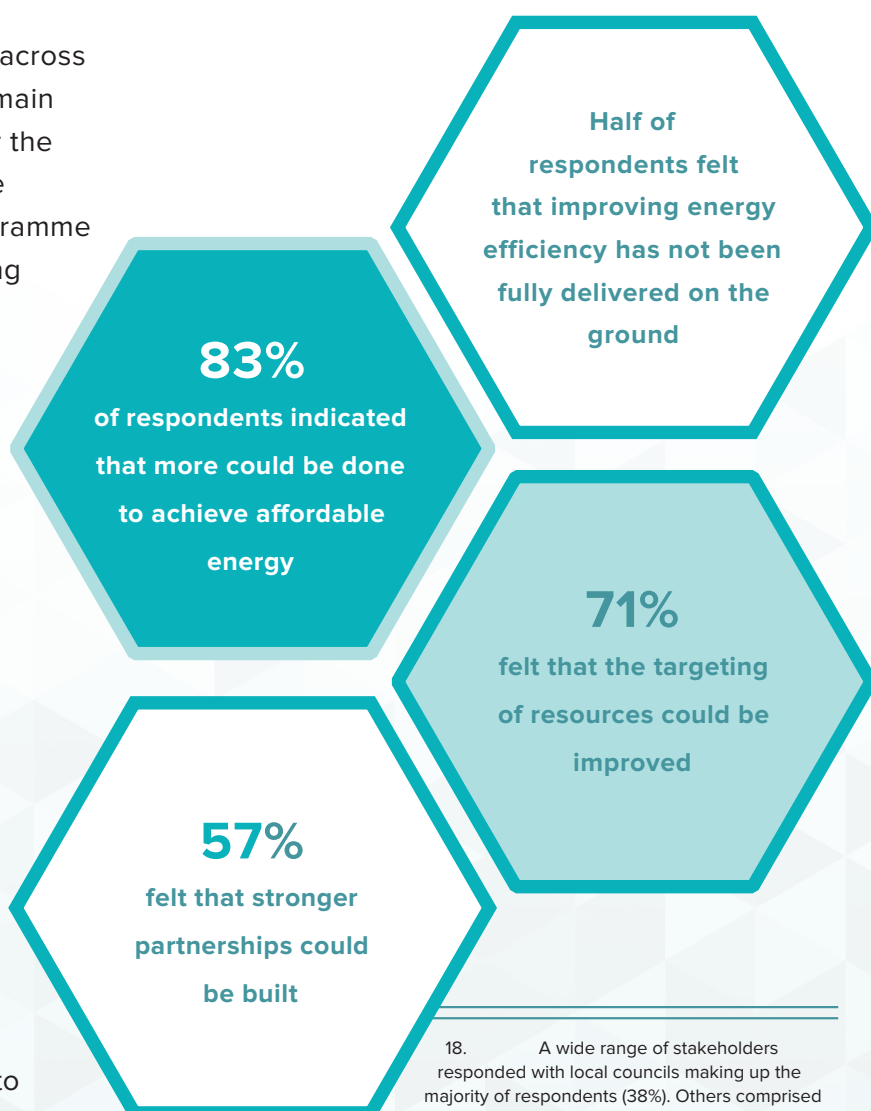
Nonetheless, NEA has continued to work across all the political parties to ensure that the main interventions tackling fuel poverty namely the Affordable Warmth Scheme (AWS) and the Northern Ireland Sustainable Energy Programme (NISEP) play their significant role in tackling fuel poverty. Our call for evidence¹⁸ examined the out-workings of the current Fuel Poverty Strategy, published in 2011. The existing strategy focuses on four key themes:

- Targeting resources
- Improving energy efficiency
- Achieving affordable energy
- Building strong partnerships

Most respondents (87%) agreed that improving energy efficiency should be a guiding principle of the strategy, and half felt that this has been fully delivered to date. Whilst 70% agreed that achieving affordable energy was the right principle to be focusing on, only 17% felt this has been fully delivered on the ground.

In 2016, 22% of households in Northern Ireland were in fuel poverty under the 10% definition (160,000). Overall, 43,800 households still spend 15%+ of their income on needed fuel expenditure and 78% of all households in fuel poverty had incomes of £15,599 per annum or less.

During the winter of 2017-18 there were 1,500 excess winter deaths in Northern Ireland, representing a 130% increase on 2015/16 levels. Of these deaths, around 450 can be attributed to cold homes.

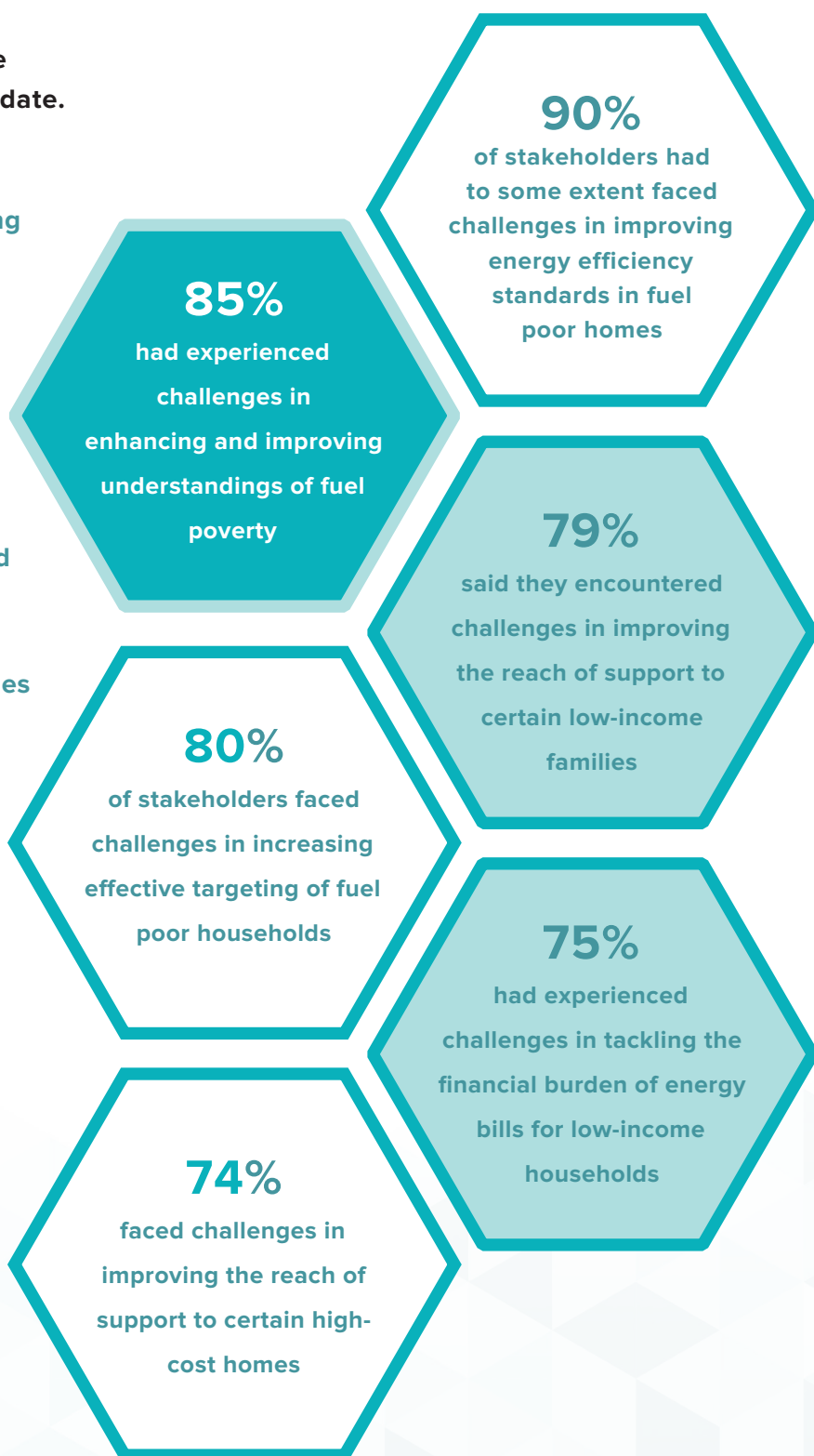


18. A wide range of stakeholders responded with local councils making up the majority of respondents (38%). Others comprised of voluntary sector 19%, housing sector 15%, academia (3%) and input from industry (8%). Most stakeholders operate solely in Northern Ireland (88%) with 58% directly supporting fuel poor households and 42% indirectly.

Stakeholders identified enablers that have helped deliver the aims of the strategy to date. These included:

- The delivery of pilot schemes, allowing providers to learn and adapt
- The use of data from the 2016 Housing Condition Survey
- Whilst there is room for improvement, stakeholders acknowledged the value of NISEP and the Affordable Warmth Scheme
- The introduction of fuel stamp schemes
- The use of area-based approaches using high-level GIS mapping

However, the majority had encountered challenges in trying to meet the aims of the strategy.



“Most respondents (87%) agreed that improving energy efficiency should be a guiding principle of the strategy”

According to stakeholders, barriers to implementing the aims of the current strategy include:

- Fluctuating energy prices and income stagnation impact the householders affected by fuel poverty most and potentially negate the cost benefits of certain energy efficiency interventions
- More honed technical expertise in assessing dwellings and more robust planning legislation is needed
- Area-based mapping and targeting does not capture all householders in extreme need
- Delivery of the strategy via funded schemes is piecemeal and needs a more universal approach. There are also funding uncertainties
- Under current schemes, demand is outweighing supply; with many vulnerable households on waiting lists for longer periods
- There is a need for holistic services encompassing income maximisation, advocacy and foodbanks to assist those with health needs and low incomes
- Grant application processes are complex and may mean households in need miss out on support
- Wholesale energy prices and an over-reliance on oil limiting the affordability of energy for fuel- poor households
- The current political impasse and the need for better joined-up working across all sectors

Defining fuel poverty in Northern Ireland

With regards to how fuel poverty is defined in Northern Ireland, a small majority of stakeholders (57%) felt that the existing 10% indicator was generally effective.

However, some stakeholders felt that the 10% measurement of fuel poverty could be underestimating the numbers of fuel poor households. The current algorithm uses equivalised data from earnings and social security benefits as a gross figure without taking into account childcare costs, debts and housing costs.

Responses indicated that adopting a disposable income baseline would provide a more accurate picture as the current criterion does not capture those who 'are destined to return to fuel poverty'.

Taking cognisance of household size and additional life costs for those with disabilities was highlighted. Another point made was that there are households not categorised as fuel poor currently living in energy inefficient housing and still suffering health issues as a result.

“Responses indicated that adopting a disposable income baseline would provide a more accurate picture as the current criterion does not capture those who ‘are destined to return to fuel poverty’.”

Current available mechanisms for addressing fuel poverty in Northern Ireland

Affordable Warmth Scheme (AWS)

When it comes to existing available mechanisms for addressing fuel poverty under the current strategy, 47% of respondents felt that the AWS was generally effective, whilst 41% felt that it was either very or generally ineffective.

<div>AWS: what's working</div> <div><ul style="list-style-type: none">Stakeholders acknowledged that the AWS has played an important role in improving the energy efficiency of Northern Ireland's domestic housing stock to date.Many lauded the local knowledge of local council staff identifying vulnerable householders, the strong consumer-focused approach, and additional support offered by working with other organisations.</div>	<div>AWS: challenges</div> <div><ul style="list-style-type: none">Long waiting times from survey to approval, complexity surrounding income checks and narrow eligibility criteria as well as funding uncertainty were all noted as challenges.Stakeholders told us that the onus on the householder to procure the contractor and issues around the customer journey led to a low number of applicants availing of grants (circa 2,400 homes per year).There was some concern around the technical inspection process at the beginning and end of process and one respondent commented it has just become 'another boiler replacement scheme'.There was also confusion around which agency to contact due to two separate agencies operating the scheme.Personnel cuts on the frontline and delays from survey to work stage led to some respondents sensing that expenditure is not maximised.Another respondent pointed out that the scheme is shared equally amongst the 11 councils despite differing populations.Overall respondents scored the effectiveness of affordable warmth at 5.3 (weighted average) out of 10.Compounding concerns around the scheme is the significant cut to the Affordable Warmth budget from £15M to £12M.</div>
<div>AWS: eligibility</div> <div><ul style="list-style-type: none">Although 50% of stakeholders felt eligibility criteria for AWS was generally effective, some felt that the current income band did not reflect actual need. Others suggested that current disregard for capital means that potentially asset-wealthy households can still utilise the scheme. This was in contrast to the scheme's approach to disability benefits; whilst these are used to pay for and help manage complex needs, they are counted in full as income.</div>	

Northern Ireland Sustainable Energy Programme (NISEP)

NEA NI welcomed the fact that the NISEP, which was set to end in March 2020 has been extended until March 2022 and continues to provide much-needed energy efficiency interventions for the fuel poor. The Utility Regulator, which has responsibility for the NISEP, in carrying out their Consumer Insight Tracker¹⁹ evidenced that a sizeable cohort of householders in Northern Ireland are rationing and self-disconnecting from their heating systems. As many as 25% going without heating^x and 43% have struggled to pay their energy bills. Our Energy Justice Campaign emphatically calls for the retention of the NISEP scheme until such times as a suitable alternative initiative for the fuel poor is put in place.

Just over half of respondents to our call for evidence (56%) said that they had found NISEP to be generally or very effective; respondents noted a 'superior customer journey to that of Affordable Warmth' and felt the programme fills a gap for those who fall outside of AWS eligibility criteria. The NISEP received a higher score of 6 out of 10 in overall effectiveness. Of the 31% of respondents who felt the NISEP was ineffective, challenges included the convoluted and differing eligibility criteria in the various programmes and lack of a single point of contact. As with AWS, stakeholders acknowledged a need for more funding, given that demand has been so high.

The main reason for which stakeholders had applied to the programme was non-eligibility for Affordable Warmth, closely followed by tenants' landlords not being prepared to pay a 50% contribution.

Other available support mechanisms

Respondents were asked if they were aware of other assistance available to vulnerable customers in or at risk of fuel poverty in Northern Ireland.

Stakeholders highlighted:

- The Northern Ireland energy advice freephone service,
- Boiler Replacement Allowance
- Home improvement grants
- Winter Fuel Payments
- Oil saving stamps and brokering clubs
- The holistic services provided by the independent advice sector and other benevolent charities.

“Just over half of respondents to our call for evidence (56%) said that they had found NISEP to be generally or very effective”

19. <https://www.uregni.gov.uk/sites/uregni/files/media-files/Domestic%20Consumer%20Insight%20Tracker%202018%20Summary%20Final.pdf>

Using existing mechanisms to deliver support to households: two case studies

Jean aged 81 from County Down was on a low income and needed to get a solid fuel heating replacement so was referred to AWS for a fully-funded gas heating system. This process took one year from referral to installation. Jean was delighted with the new boiler despite this requiring numerous phone calls and significant hand-holding throughout the process.

The period from the preliminary assessment to technical inspection took the longest. This highlights the need for improvement of the customer journey in a seemingly straightforward heating replacement.

Another lady from rural County Antrim had a broken oil heating system and required an urgent replacement. She is 85 with serious physical health problems and depression; she was referred by a 'Good Morning' service demonstrating her vulnerability. She was using a kettle to heat water to wash.

The AWS was operating a triage using age and disability criteria however the scheme was so inundated with applications that she had to apply for a partially-funded boiler replacement grant as AWS could not allow for a retrospective grant (paid after work completed).

The lady had to borrow money off family to meet the rest of the costs of the work. This highlights the need for a ring-fenced emergency fund for vulnerable householders in immediate crisis.

A client in her 80s needed a new boiler, she was not eligible for AWS and was referred to NISEP, she had physical health problems and was unable to afford a new boiler. Her referral was fast-tracked by NISEP due to the urgency of her need and the heating was installed within one month of referral.

This illustrates a facility of treating an urgent case and the viability of a streamlined customer journey.

Response from key agencies:²⁰

Response from the Department for Communities

“A new fuel poverty strategy is now underway and will be complete by March 2020. We will be looking at the similar areas for action with targeting of resources, improving energy efficiency and achieving affordable energy. We have currently been targeting the affordable warmth scheme seeking out the 33,000 households in Northern Ireland who need to spend 25% of their income to heat their homes and this will continue under the new strategy. We still believe that this is the correct thing to do: ‘target the worst first’. This will require further mapping work with Ulster University. Despite good working relationships with the 11 councils and the Northern Ireland Housing Executive, we will look at the area of ‘Building Strong Partnerships’ and look at how we could work with key partners to support the new fuel poverty strategy.

We also would like more engagement with councils and the community, planning outcome-based models currently being adopted by them will serve as a good model to further work on fuel poverty interventions, including the role of advice and information on schemes.

The role of the Northern Ireland Sustainable Energy Programme is also vital in tackling fuel poverty and at a time of budget challenges the programme should be looked at within the broader fuel poverty and energy efficiency landscape which will also require the involvement of the Department for the Economy. We have evaluated the health impacts of the Affordable Warmth Scheme and it is clear that there are huge benefits to the interventions which have positive impacts on health and wellbeing.

The new strategy planning will look to assess how the scheme has performed to date and will look to be more expansive across other tenures while still ensuring the money stays targeted but with all these things, the actions will be subject to budgetary constraints.”

Response from the Department for the Economy

“The existing Strategic Energy Framework expires in 2020. The Department will bring forward a new draft Energy Strategy for Northern Ireland for an incoming Minister. As part of this process, the Department will issue a Call for Evidence in autumn 2019. Following an analysis of submissions, the Department intends to set out policy options in a paper targeted for spring 2020 with the intention of producing the draft Energy Strategy by the end of 2020.”

20. NEA wrote to both the Department for the Economy and Department for Communities Permanent Secretaries and carried out qualitative interviews with two senior staff members in each department

Observations for the future

May 2019 saw a key piece of research^{*} which was commissioned by the Northern Ireland Housing Executive on the state of Cavity Wall Insulation in mainly their own properties. The findings have indicated significant problems across NIHE properties and houses in the private sector which would warrant a significant policy intervention.

Domestic home heating oil, a non-regulated fuel, continues to provide 68% of all households in NI with their space heating. This poses many difficulties for households both in how they buy and pay for oil and also on the standards of service provision received. We have been working with the Competitions and Markets Authority and others to gain traction on a probe into the area. We note the NIHE have initiated their latest research project 'Handiheat' which will help to address this by examining energy performance in rural areas and develop a roadmap for the domestic heating oil users.

While Council elections in May 2019 have provided us with some opportunity to highlight the effects of fuel poverty in circa 160,000 households across NI and the necessary action required to address this issue, significant interventions will require ministerial approval on both the Affordable Warmth Scheme and the NISEP. Incidentally, since the collapse of the Northern Ireland Executive, a paper was submitted for Ministerial approval for improvements to the Affordable Warmth Scheme which have yet to be introduced.

That said, current schemes are already significantly oversubscribed and the cut to the Affordable Warmth scheme budget will put additional pressures on these interventions.

RECOMMENDATIONS FOR NORTHERN IRELAND

1. An energy efficiency target for Northern Ireland must be established. This will drive forward the need to make energy efficiency and infrastructure priority.
2. The Department for Communities must review the current fuel poverty strategy and establish a new fuel poverty strategy. The new strategy should have a renewed focus on oil, cavity wall insulation, technical performance, the private rented sector and building effective partnerships which includes the Department of Health and the Department for the Economy. A clear and transparent reporting framework should be established to measure progress.
3. Energy efficiency and fuel poverty schemes must remain focused and targeted and ensure that any successor to the NISEP remains socially just.

“An energy efficiency target for Northern Ireland must be established. This will drive forward the need to make energy efficiency an infrastructure priority.”

CONCLUSION: IMPLEMENTING FUEL POVERTY STRATEGIES ACROSS THE UK

The scale of the problem

Affecting 24.9% of households in Scotland, 22% in Northern Ireland, 12% in Wales and 10.9% of households in England²¹, fuel poverty is a very real and stark reality for many people in the UK. Indeed, we estimate that more than 4 million UK households are struggling to afford to meet their basic needs for comfort and warmth at home. This has real consequences for health, and the winter of 2017-18 saw the highest recorded numbers of Excess Winter Deaths in the UK since 1975-76. In England, cold temperatures killed over 50,000 people (and cold homes killed over 15,000). In Northern Ireland, there were 1500 excess winter deaths, of which around 450 can be attributed to cold homes. In Scotland, 4,800 excess deaths over winter saw 1,440 people dying as a result of living in a home which was too cold. There were 3,400 excess winter deaths in Wales, around 1000 of which will have been linked with cold homes. Across the UK, that means around 16,900 people will have died last winter because they were unable to keep their home warm enough. That also means that at least 135,000 unnecessary non-fatal hospital admissions happened as a result of inadequate indoor temperatures.

Measuring fuel poverty

Across the UK there are three different approaches to how fuel poverty is defined and measured, and some approaches will continue to change over the next year.

In Wales and Northern Ireland, a household is considered to be in fuel poverty if they spend more than 10% of their income on fuel. In England, Government is considering moving away from the current Low Income High Cost definition, to focusing on one which prioritises the absolute measure of efficiency rating of a property in combination with the current relative measure on income. This would see more than a million more households being

considered fuel poor in EPC bands D - G, but would simultaneously reclassify around 200,000 currently fuel poor households living in Band C or above as non-fuel poor. Meanwhile, the new fuel poverty definition in Scotland now says that a household is in fuel poverty if the fuel costs are more than 10% of its net income and, if after deducting fuel costs, certain disability benefits and child care costs, the remaining net adjusted income is insufficient to maintain an acceptable standard of living for members of the households. Across all definitions (both existing and proposed), what is clear is that action to improve energy efficiency must go hand in hand with the provision of bill support and advice.

The varying application of fuel poverty definitions across the UK means the delivery of support across national borders and the calculation of the extent and depth of fuel poverty across the UK is extremely complex. Nevertheless, despite differences in how fuel poverty is defined, our Call for Evidence revealed a number of common barriers faced by practitioners across all four nations.

Stakeholders consistently reported challenges around identifying and targeting households, applying existing eligibility requirements to deliver support to people, and the use of appropriate and adequate data to map and identify households and local areas of need. Whilst there are some good practice examples of how some schemes are creatively overcoming such barriers and using existing tools/mechanisms to deliver support, the clear message is that approaches need to be consistent, data should be easily accessible, delivery easily replicable, and eligibility reflective of need and of the real-life pressures facing vulnerable and low-income households.

21. According to the differing definitions that are used in each of the UK nations. See section on Fuel Poverty Definitions.

Strategies for tackling fuel poverty within the UK: a coordinated approach?

Across all four UK fuel poverty strategies (actual and proposed), there are common themes and aims.

These include:

- Improving energy efficiency
- Supporting and improving partnerships
- Targeting and prioritising households in most need
- Lowering energy bills
- Provision and use of data, and improving the evidence base

Perhaps the most notable gap is co-ordinated action to boost household incomes which continues to be a key reason for energy debt and energy affordability issues. One of the main reasons is that unclaimed benefit entitlements remain endemic. Figures from the Department for Work and Pensions (DWP) reveal that 40% of families in Great Britain who are eligible for pension credit failed to claim the benefit during the 2016/17 tax year, leaving them missing out on an average of £2,500 for the year. 20% of families eligible for housing benefit, and 16% of those eligible for income support or income-related employment and support allowance (ESA) are not claiming the support that should be available to them. Take-up is affected by a range of factors such as a lack of awareness or the perceived stigma of receiving benefits.

Suppliers can help address this by ensuring all customers have greater access to services to check benefits entitlements before debt repayment plans are agreed or signpost appropriate income maximisation services when repayment plans are reviewed. This should complement similar actions by the UK Government, each of the UK nations and other providers of essential services, as recommended in the Public Accounts Committee report on Consumer Protection which found many consumers face similar problems accessing water, energy, communications and financial services. If replicated consistently across all essential service utilities this could potentially leverage an estimated £10 billion of unclaimed pension credit and income support towards paying for essential goods and services, including energy.

There are also some key ways in which fuel poverty strategies differ across the nations in terms of their guiding principles and aims. The fuel poverty strategies for Scotland and Wales make explicit reference to the importance of national fuel poverty programmes and area-based schemes. Though explicit mention is not made in the strategy for Northern Ireland, national and area-based schemes have been a key element of its implementation to date. The only national strategy which does not explicitly reference central or area-based support is the fuel poverty strategy for England.

Here, reference is made to the need for cost-effective policies, whilst the 2019 consultation document highlights the Energy Company Obligation (ECO) and Minimum Energy Efficiency Standards in the Private Rented Sector (MEES) as key policies for meeting energy efficiency targets and tackling fuel poverty. Meanwhile, whilst the fuel poverty strategy for Wales highlights the need to take people's needs into account, the only strategy to explicitly include the need to reflect vulnerability in policy decisions is the fuel poverty strategy for England.

There is an implied consensus across the four nations in terms of 'what needs to be done'. However, there are major divergences in the approaches that are being taken, namely the way in which energy efficiency improvements are delivered and funded, and the extent to which vulnerability is interwoven with fuel poverty definitions and policy formulations. Whilst most respondents in each nation agreed that the respective guiding principles of their national fuel poverty strategies were the right ones to be focusing on, the majority felt there has not been enough progress on delivering key aims and targets. Consistently cited challenges included:

- Insufficient resource to deliver energy efficiency improvements (even where there are area-based schemes in place) and, in England, a lack of stable, central, long-term funding for energy efficiency
- Lack of resource to cover revenue (staff) costs associated with the delivery of energy efficiency and bill support and advice to vulnerable households
- Limited provision for delivering adequate and appropriate support to rural and hard-to-treat properties

- Difficulties associated with improving energy efficiency standards in the private rented sector, despite the introduction of MEES in England and Wales
- Falling incomes, increasing levels of poverty and the impact of austerity
- Unaffordable energy costs for low-income and vulnerable households alongside rising levels of fuel debt/arrears
- Existing available data and tools do not capture all households in need, with calls for more data, evidence and mapping tools as well as the sharing of best practice approaches
- More provision is needed to deliver the holistic support needed by vulnerable, fuel-poor households i.e. being able to deliver whole-house approaches and address the multiple needs of the person
- Eligibility-based tensions between prioritising those in most severe need, and having the ability to support households who are in need but not captured by existing eligibility requirements or who are on the brink of falling into fuel poverty

Respondent views captured within our Call for Evidence differed widely with regards to how successful attempts to develop partnership working had been in each nation (only 29% in Scotland felt there were barriers to partnership working, whilst 74% did so in Wales and 96% in England). An implication from stakeholder reflections is that the different funding environments in each nation mean the extent to which holistic packages of help can be knitted together – and therefore the ease with which successful partnerships can be built and maintained – varies greatly.

Conclusion

The Clean Growth Strategy reaffirmed the fuel poverty targets and interim milestones for England. However, under current rates of progress, NEA estimates that it would take 96 years to meet the 2030 target^{xi}. Meanwhile, the Fuel Poverty Act for Scotland^{xii} has introduced a new set of targets and milestones. After the 2018 target for Wales was missed it is, as yet, unclear as to whether a new target will be introduced. Similarly, in Northern Ireland, it is not yet apparent

whether a new fuel poverty strategy will include energy efficiency or fuel poverty targets.

Respondents to our Call for Evidence were generally positive towards the setting of targets, especially because they can be useful tools for compelling action, assessing progress and holding policymakers to account. However, given the UK Government's recent declaration of a climate emergency and the introduction of a net-zero emissions target of 2050 (which had already been in place in Scotland since 2015), the Committee on Climate Change's^{xiii} observation that there is a "lack of commitment towards energy efficiency" from the Government is particularly damning.

The Committee urges the Government "to view energy efficiency as a public good that can unlock a full suite of benefits, rather than a cost to diminish or outsource." The Committee goes on to note that if the energy efficiency investment shortfall is not addressed, the UK Government will "end up in contravention of statutory fuel poverty and climate targets."

As well as forming a significant part of the decarbonisation agenda, action on energy efficiency can bring multiple benefits to society; the impact of cold homes and poor housing in England alone amounts to at least £1.4billion each year in costs to the NHS. The Energy Efficiency Infrastructure Group (EEIG) has estimated that for every £1 that is spent on energy efficiency, GDP increases by £3.20^{xiv}.

In addition, the recent BEIS Committee 2019 report^{xv} on energy efficiency says that through appropriate investment in energy efficiency: between 66,000 and 86,000 jobs could be sustained annually across all UK regions; and total energy use could be reduced by an estimated 25 per cent by 2035 - equivalent to the annual output of six Hinkley Point Cs.

It is therefore essential that the UK Government and Devolved Governments across the UK acknowledge and understand the challenges faced by practitioners on the ground and set out meaningful and concrete actions that will deliver on national fuel poverty strategies and meet or even exceed the targets they contain. We cannot leave another generation to struggle and suffer in fuel poverty, and we must take real steps to decarbonise in ways that are inclusive of the most vulnerable in society.

RECOMMENDATIONS

UK-wide recommendations:

1. The UK Government should designate domestic energy efficiency as a national infrastructure priority, in line with recommendations from the Committee on Climate Change and BEIS Select Committee on Energy Efficiency and reflecting the existing designation of the Scottish Government (2015).
2. The UK Government should introduce a new UK-wide fund to support the aims of the UK-wide Clean Growth Strategy to ensure all UK homes reach an EPC band C no later than 2035. This would prioritise assistance on fuel poor households to help each of the UK nations meet their own fuel poverty targets and milestones across the nations.
3. The Warm Home Discount scheme (including the Industry Initiatives element) must continue beyond 2021 and ensure more low-income working families receive support automatically.
4. NEA calculates a fuel-poor lone parent faces a gap of £9,331 and a fuel-poor couple with children faces a gap of £6,516 between their incomes and the essential cost of living. The UK Government must end the 'freeze' and uprate working-age benefits.
5. Suppliers should ensure all customers have greater access to services to check benefits entitlements before debt repayment plans are agreed or signpost appropriate income maximisation services when repayment plans are reviewed.
6. The UK Government and each of the UK nations should provide or promote benefit entitlement checks and income maximisation services, especially unclaimed pension credit and income support to enhance the ability to pay for essential goods and services, including energy.
7. The UK and Devolved Governments must ensure respective fuel poverty strategies for each nation are published, passed and updated in a timely manner and that they are sufficiently resourced to deliver the commitments they contain.
8. The UK and Devolved Governments should review eligibility requirements for existing fuel poverty support mechanisms to ensure households in most need can receive support, whilst simultaneously recognising shifting vulnerabilities and fuel poverty risk in low-income households.
9. The UK and Devolved Governments must take steps to align current carbon reduction commitments to develop socially just routes to decarbonisation that will simultaneously reduce fuel poverty.
10. The UK and Devolved Governments must ensure existing mechanisms for improving energy efficiency standards in the private rented sector are fit for purpose. UK Government should consult on the MEES trajectory in England and Wales to bring it in line with the fuel poverty strategy target of bringing as many properties as is reasonably possible up to an EPC Band C by 2030.

SUMMARY OF NATION-SPECIFIC RECOMMENDATIONS:

Recommendations for England

1. The UK Government should introduce a new Clean Growth 'fuel poverty challenge fund' by the end of 2019-20, as recommended by the Committee on Fuel Poverty 2018 Annual Report and providing necessary central investment to meet the near-term fuel poverty milestones. This would amount to a £1bn fund running from 2019 to 2021 to help the poorest households through: an area-based energy efficiency scheme, a rural-only energy efficiency scheme, and a health-based energy efficiency scheme.
2. The UK Government must take steps to make the Renewable Heat Incentive (RHI) accessible to fuel poor households and to ensure the distributional impacts of the policy do not place additional strain on low-income households.
3. The Warm Home Discount scheme must continue beyond 2021 and ensure more low-income working families receive support automatically.
4. The UK Government to introduce tax-based incentives for landlords who exceed minimum standards under MEES, to enhance co-operation on improving energy efficiency within the private rented sector.
5. The UK Government should consult on the MEES trajectory to bring it in line with the fuel poverty strategy target of bringing as many properties as is reasonably possible up to an EPC Band C by 2030.
6. The Energy Saving Advice Service (ESAS) should be reintroduced and government should also urgently consider a new bespoke 'extra help scheme' to deliver targeted support during and after the smart meter roll-out.
7. BEIS, the Department for Health and Social Care (DHSC) and Public Health England (PHE) must ensure the Better Care Fund, or its successor helps low-income households with long-term respiratory or circulatory health conditions receive priority assistance for preventative energy home improvements.
8. NEA calculates a fuel-poor lone parent faces a gap of £9,331 and a fuel-poor couple with children faces a gap of £6,516 between their incomes and the essential cost of living. The UK Government must end the 'freeze' and uprate working-age benefits to complement other action to increase incomes.
9. Obligated ECO suppliers must uphold their obligations to treat customers fairly and respond to enhanced needs when delivering ECO and smart meter obligations. This includes highlighting how other forms of supplier-led assistance can be accessed if the most vulnerable fail to benefit from energy saving measures under the scheme.
10. Ofgem should introduce minimum standards for compulsory energy efficiency advice when GDNs (or their contractors) complete a connection under the Fuel Poor Network Extension Scheme (FPNES), similar to the Smart Meter Installation Code of Practice (SMICOP) for smart meter installations. We support proposals for vulnerability principles to lie within standard licence conditions. This would ensure all network companies are required to identify and act on vulnerability in a similar way that is required of all licenced energy suppliers.
11. The UK Government and, in turn, Ofgem, should cultivate a workable set of incentives which ensure the role of energy network companies in facilitating and funding energy efficiency.

Recommendations for Scotland

1. The Scottish Government must publish, lay and pass a properly resourced and timely Fuel Poverty Strategy for Scotland, including relevant regulations from the Fuel Poverty (Targets, Definition and Strategy) (Scotland) Act 2019.
2. Warmer Homes Scotland funding must be scaled up and eligibility requirements reviewed to match current policy.
3. All four drivers of fuel poverty must be resourced via the Fuel Poverty Strategy.
4. A move towards reporting on impact of the fuel poverty programmes, rather than focusing on the amount of measures installed, is required.
5. The Private Rented Sector standard, part of Energy Efficient Scotland, must come online sooner rather than later, with enough feed-in time for the industry to be able to respond effectively.
6. There must be a proper assessment made of the new technologies proposed for Energy Efficient Scotland. These technologies are being relied upon by Government to meet the fuel poverty targets but it is essential that these are assessed in order to meet their potential.
7. The Warm Home Discount Scheme (including the Industry Initiative strand) should continue beyond 2021. The Scottish Government should keep this under review and when appropriate should implement a Scottish version of this
8. The Scottish Government should ensure Scotland receives a proportionate share of ECO funding. They should also re-examine whether Scottish programmes could be better integrated with ECO

Recommendations for Wales

1. The Welsh Government should accept the recommendations outlined in The Decarbonisation of Homes in Wales Advisory Group to improve fuel poor homes to an energy performance standard of EPC Band A (SAP 90+) over the next 10 years.
2. The new fuel poverty plan should be designed in sync with the Welsh Government's plan to decarbonise Wales. It is essential that households living in fuel poverty are supported first.
3. The Welsh Government should review the eligibility criteria for its Nest scheme to consider how low-income households, not on means-tested benefits, and living in energy-inefficient homes can be assisted.
4. The Welsh Government should consider how it can support local authorities to help maximise funding for energy efficiency improvements via the ECO flexible eligibility scheme.
5. Funding for more holistic advice should be included within the new fuel poverty plan to include the provision of in-home visits offered to all households who call the Nest advice line for assistance.
6. Local authority-led Affordable Warmth Groups should be established to bring together multi-agency partnerships to co-ordinate action at a local level and share best practice.
7. The Welsh Government should publish and make available a Cold Weather Plan for Wales to address the burden of excess winter deaths and cold-related illhealth in the country.
8. A Strategic Monitoring Board should be implemented to monitor and oversee the delivery of the new fuel poverty plan and to bring together multi-sector partnerships to implement an accompanying Action Plan, as well as to review and report on progress. This should include representatives from the Welsh Government, members of the Fuel Poverty Coalition, cross-governmental departments, the voluntary sector, national and local health and social care commissioners, energy and network companies, Ofgem, local authority and housing association representation.

Recommendations Northern Ireland:

1. An energy efficiency target for Northern Ireland should be established, driving forward the need to make energy efficiency and infrastructure priority.
2. The Department for Communities must review the current fuel poverty strategy and establish a new fuel poverty strategy. The new strategy should have a renewed focus on oil, cavity wall insulation, technical performance, the private rented sector and building effective partnerships which includes the Department of Health and the Department for the Economy. A clear and transparent reporting framework should be established to measure progress.
3. Energy efficiency and fuel poverty schemes must remain focused and targeted and ensure that any successor to the NISEP remains socially just.

END NOTES

i UK Parliament 2019: Energy efficiency, building towards net zero. Available: <https://publications.parliament.uk/pa/cm201719/cmselect/cmbeis/1730/173002.htm> [accessed 29th July 2019]

ii <https://www.gov.uk/government/publications/committee-on-fuel-poverty-annual-report-2018>

iii DECC, 2015, Cutting the Cost of Keeping Warm: A fuel poverty strategy for England. Available: <https://www.gov.uk/government/publications/cutting-the-cost-of-keeping-warm> [Accessed 22nd July 2019]

iv BEIS, 2019, Fuel Poverty Strategy for England consultation. Available: <https://www.gov.uk/government/consultations/fuel-poverty-strategy-for-england> [accessed 22nd July 2019]

v BEIS, 2017, Clean Growth Strategy. Available: <https://www.gov.uk/government/publications/clean-growth-strategy> [accessed 22nd July 2019]

vi Based on existing rate of installation of solid wall insulation and the number of fuel poor households with uninsulated solid walls (1 million).

vii UK Parliament 2019: Energy efficiency, building towards net zero. Available: <https://publications.parliament.uk/pa/cm201719/cmselect/cmbeis/1730/173002.htm> [accessed 29th July 2019]

viii EAS/NEA, Call for Evidence on the UK Fuel Poverty Monitor 2018/19, March 2019

ix <https://www.uregni.gov.uk/sites/uregni/files/media-files/Domestic%20Consumer%20Insight%20Tracker%202018%20Summary%20Final.pdf>

x <https://www.nihe.gov.uk/getmedia/492a0403-2cb8-4482-bd7a-8e5df3f37d4b/2019-Cavity-Wall-Insulation-Research-report.pdf.aspx?ext=.pdf>

xi Based on existing rate of installation of solid wall insulation and the number of fuel poor households with uninsulated solid walls (1 million).

xii The Fuel Poverty (Targets, Definition and Strategy) (Scotland) Act 2019

xiii UK Parliament 2019: Energy efficiency, building towards net zero. Available: <https://publications.parliament.uk/pa/cm201719/cmselect/cmbeis/1730/173002.htm> [accessed 29th July 2019]

xiv EEiG <https://www.theeeig.co.uk/media/1026/fe-energy-efficiency-final-clean-250917.pdf>

xv See the BEIS Committee report here - <https://publications.parliament.uk/pa/cm201719/cmselect/cmbeis/1730/173002.htm>



Action for Warm Homes



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