

LOCAL GOVERNMENT AND COMMUNITIES COMMITTEE

**FUEL POVERTY (TARGET, DEFINITION AND STRATEGY) (SCOTLAND) BILL
CALL FOR VIEWS**

SUBMISSION FROM WARMWORKS SCOTLAND

1. Do you agree with the Scottish Government's proposal to provide for a statutory target to reduce fuel poverty to no more than 5 per cent of Scottish Households by 2040.

Comments

We welcome the Scottish Government's commitment to tackling fuel poverty and strongly agree that a statutory target is necessary to ensure not only that steps are taken in the right direction to address this issue, but also that momentum is maintained over the long term.

In terms of whether it is achievable or not, we are particularly interested in the proposed delivery mechanisms that will be used in the Scottish Government's efforts to reach the target. Agreeing the scope and nature of the target is an important first step; but only a first step as the path to 2040 unfolds – questions around resourcing and targeting the programmes and initiatives that will achieve the target are considerations that will need to be brought to the fore.

Effective delivery should be central to all initiatives that are designed to help people who are living in fuel poor households. These delivery mechanisms should be properly resourced, customer focused, and robustly scrutinised to ensure they provide a high-quality service.

2. Do you agree with the Scottish Government's proposals for a revised definition of fuel poverty?

Comments

We understand and agree with the Scottish Government's proposals for a revised definition of fuel poverty, however an average person living in fuel poverty may not necessarily comprehend it and it will be harder for organisations to identify people in fuel poverty given the complexity of the definition. This is not a definition that could be precisely captured 'on the doorstep' or embedded within a delivery mechanism at scale. With almost 700,000 households in fuel poverty under the current definition, scale is clearly important when considering how help and assistance is delivered.

In any case, it is important to recognise that this definition will only ever include people who, in that snapshot of time, are fuel poor – there could be people who only spend 9% (but less than 10%) of their household's adjusted net income on fuel bills who will always be vulnerable of falling into fuel poverty, but who will not be classed as 'fuel poor' at that moment in time under this definition.

We are focused on helping those households who are struggling with the costs of their energy bills and need a streamlined, customer-focused, quality-driven service that helps them become warmer and more comfortable in their homes. Given the chaotic nature of the circumstances that often surround homes that are in or at risk of fuel poverty, we believe that ‘fuel poverty proofing’ homes at risk is still more valuable than allowing assistance to be delivered purely on the basis of a ‘snapshot in time’ definition. This is why Warmworks supports proxies for fuel poverty as a means of delivering assistance to households in need and doing so at scale. We would be happy to participate in discussions around what proxies might be most useful in meeting the proposed new definition.

3. Do you agree with provisions in the Bill requiring the Scottish Government to publish a fuel poverty strategy? Do you also agree with the consultation requirements set out in relation to the strategy?

Comments

We agree with the provisions in the Bill requiring the Scottish Government to publish a fuel poverty strategy and agree with the consultation requirements set out in relation to the strategy.

It is important that the experiences of people who are living in fuel poverty form part of the consultation – an understanding of their circumstances and priorities should help shape the strategy and its aims.

Furthermore, the consultation requirements should also include key delivery partners of existing fuel poverty programmes, in addition to local authorities and community groups.

4. A [draft fuel poverty strategy](#) was published alongside the Bill on 27 June. Do you have any views on the extent to which the measures set out in the draft Fuel Poverty Strategy for Scotland 2018 will contribute to meeting the Government’s new target? Have lessons been learned from previous initiatives?

Comments

We welcome the review of eligibility for the Warmer Homes Scotland scheme as noted in the draft fuel poverty strategy – this alongside continued delivery at scale of a trusted, customer-focused, quality-driven service, will play a key role in meeting the objectives set out in the strategy and the Government’s proposed target. The eligibility criteria for Warmer Homes Scotland have already changed several times in the last three years and it is right that they should continue to evolve in a measured way that meets the changing demands of broader policy aims and objectives. Warmworks can supply quantitative data and qualitative insights from more than 14,000 Warmer Homes Scotland customers to feed into this process.

Warmer Homes Scotland’s key performance indicator scores, which monitor the levels of customer service and care being provided under the programme, are at historically high levels for programmes of this type; this means that more vulnerable people are being assisted with energy efficiency measures irrespective of location, and all are

experiencing life changing financial savings on their energy bills. When compared to previous energy efficiency schemes, lessons have been learnt in terms of the quality that is delivered, the scalability that has been achieved and the level of customer service that has been experienced. It will be important to share these lessons and ensure that they are embedded within the design of future programmes.

The precedent has been set regarding the standard that schemes like Warmer Homes Scotland can and should deliver, and it will only continue if they are properly and adequately resourced moving forward.

5. Do you have any views on the Scottish Government's reporting requirements to the Scottish Parliament, as set out in the Bill?

Comments

We welcome periodic reviews aligned to the timeframe set out in the Bill, in addition to the monitoring of progress and scrutiny of the strategy by two independently chaired groups. It would be useful to define their roles and powers in greater detail to ensure full transparency and accountability.