

LOCAL GOVERNMENT AND COMMUNITIES COMMITTEE

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

SUBMISSION FROM MYDEX

Introduction

Mydex is a Community Interest Company. Our mission is to empower individuals to manage their lives more effectively through convenient, trustworthy access and control of their personal data and how it is used by them and others.

Mydex CIC was lead partner in EPCAS, Equality and Empowerment through Person-Centred Energy Advice Services (EPCAS). This proof-of-concept project, ran for a year to end September 2018 and was funded by the Scottish Government and European Social Fund through the Social Innovation Fund. It aimed to tackle the social problem that efforts to tackle fuel poverty are frequently hindered by data being captured and stored in organisation-centric systems, despite intentions towards person-centred services. The fragmentation of services, complex nature of the problem, and resulting friction in data flows, can leave fuel-poor citizens struggling to find the right bit of evidence at the right time to prove their entitlements and means citizens can find themselves repeating a story many times. The Project worked with Partners in Renfrewshire, including Linstone Housing Association and Renfrewshire Council, and gained an understanding of the lived experience of fuel-poor households through discovery work and in co-design of a digitally enabled solution that removes cost, risk and friction in data flows, whilst empowering citizens with control of their data and promoting a better understanding of their own situation and actions they can take to improve it.

<https://medium.com/epcas>

This project made use of the existing, ISO 27001 certified, Personal Data Store service operated by Mydex and built an innovative Web-App Generator, available on an Open Government License, which can empower front-line workers and citizens to digitally enable services. Use of the WAG significantly reduces the usual costs involved with digitising the “long-tail” of public services, i.e. those services that typically rely on insecure, paper-based processes and manual input of data to siloed databases and spreadsheets.

Responses to Questions

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 percent of Scottish Households by 2040?

The stated aim is to eradicate fuel poverty but the 5% statutory target proposed does not amount to eradicating fuel poverty. Eradication may not be easy, and is certainly unlikely without a significant development to the draft strategy published with the bill. However, particularly given the bi-directional relationship between fuel poverty and health, eradication of fuel poverty is crucial not just to citizens but to health sector budgets.

We note the explanation in the SPICe briefing that the Scottish Government may be reluctant to set a more ambitious target, given a sense that two of four commonly accepted main drivers of fuel poverty are largely outwith Government control. However we assert that both household incomes, and fuel costs paid by households, are influenceable to some degree by Government. The Holyrood Events Tackling Fuel Poverty Conference, held on 19/09/18, concluded that The Bill needs to be improved overall in ambition and scope. Therefore we propose that the draft Fuel Poverty Strategy be significantly developed, prior to publication within the required timescale, to include a clear plan to address the influenceable elements of these factors. As we will outline in the following sections **making the citizen the point of integration for data** required and generated when tackling fuel poverty would provide a significant underpinning to enable a more concerted response to fuel poverty. This could in turn enable a more ambitious statutory target.

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

Moving beyond snapshots of households' situation to an ongoing relationship

In general we are in support of revising the definition. However, regardless of the exact definition adopted, the measurement system proposed places too much emphasis on taking snapshots of measures of whether or not households are fuel poor at any given time. Furthermore, there is a risk that a search for a perfect measure becomes the enemy of developing a good enough measure to enable necessary and sufficient action to be taken. Focusing on snapshot measures could lead to insufficient emphasis on developing systemic responses to the risk that a household might face of becoming fuel poor, even if it does not happen to be fuel poor at the time of the measure. This debate is also at risk of ignoring that there is a core group of households who are definitely fuel poor by any measure, that energy efficiency measures alone will be insufficient to address their fuel poverty, and that a systemic response to the influenceable aspects of household income, costs of

energy paid by households, and household behaviours is required. Delegates at Holyrood Event's Tackling Fuel Poverty conference generally agreed with Dr Keith Baker's presentation outlining the idea of "folk first" responses and observed that it is happening to some extent. However they said that "folk first" responses are patchy and not embedded. Several delegates highlighted that a "folk first" approach requires ongoing work, often needing repeat visits and support for citizens over time. The Holyrood Events Tackling Fuel Poverty Conference concluded that the definition of fuel poverty in the Bill needs to be adjusted to better support the differences between rural and urban housing stock and heating fuels and to take account of the dynamic nature of both vulnerability and resilience to fuel poverty. Person-centred data capture and sharing would lead to increased ability to review wider contextual factors relating to households and improve the definition and consequent targeting over time.

Resolving data fragmentation by making data capture and sharing person-centred

One of the reasons that there has been so much emphasis on defining fuel poverty may be that fragmentation of data in the current system makes it hard to gauge the actual outcomes resulting from the many initiatives aimed at addressing fuel poverty. Whilst the annual Scottish House Condition Survey may give a reasonable snapshot of fuel-poverty it does not assist greatly developing an understanding of the relationship between the various initiatives to tackle fuel poverty and their outcome. The draft Fuel Poverty Strategy, published alongside the Bill, states "We have recently begun installing temperature monitoring equipment in properties benefiting from energy efficiency measures under Warmer Homes Scotland which will provide data on the impact of the measures installed." We can understand the driver for this but would caution that GDPR, and changes in public perception and trust, are driving increasing needs among citizens, families, organisations and carers for person-centred design that is trustworthy, respected, dignified, Scottish and inclusive. Operationally, the Tackling Poverty Reports across Scotland reveal that citizens seek trustworthy, local and convenient services that empower individuals, make use of technology, e.g. sensors, whilst ensuring that the citizen is at the centre. Furthermore, empowering citizens to see the data collected by sensors in their homes, alongside other data relevant to their situation, and combined with tailored advice about their situation, would be much more powerful. Ben Miller, speaking at Holyrood Events' Tackling Fuel Poverty Conference, stated that Smarter Energy GB's view is that being able to disaggregate data around home energy usage is key but that this comes with consent issues. Making citizens the point of integration for data capture and sharing should be a priority that would underpin an ability not only to measure households in fuel poverty at any given time, and by any measure, but also to store disaggregated usage data and empower citizens to play an active part in tackling their own fuel poverty alongside various initiatives. Also at Holyrood Event's Tackling Fuel Poverty conference Dr Keith Baker argued for the use of "dynamic, risk-based metrics of vulnerability to fuel poverty"; this something that will

definitely require a very different approach to the organisation-centric, non-sharable approach that is currently used to capture and store data relevant to addressing fuel poverty.

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?

Yes, the Scottish Government should be required to publish a fuel poverty strategy.

Requiring consultation of wider stakeholders

The consultation requirements set out in the Bill in relation to the strategy should be expanded to require that local authorities, third sector organisations and citizens with lived experience should be consulted.

The possibility to go beyond consultation to co-design

We observe that other Scottish Government strategy development has recognised an ambition to fully involve stakeholders in in co-designing solutions. Use of the Web-App Generator we developed under the EPCAS project and available on Open Government License, could enable such co-design in a a cost-effective manner. The WAG embeds the Scottish Digital First Standard and good practice from the GDS Service Design Manual and is in support of the Scottish Approach to Service Design.

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?

Addressing all four drivers of fuel poverty and their relationship to other policy areas

The Bill states that a Fuel Poverty Strategy published within 1 year of within a year of Section 3 of the Bill coming into force would need to set out the approach that Ministers intend to take to ensure that the 2040 target is met. The draft Fuel Poverty Strategy published on 27th June 2018 is inadequate in that it does not set out a full enough approach to ensuring the 2040 target is met. It does not systematically address each of the four drivers of fuel poverty, the interrelation between them, nor their interrelation with other Scottish Government objectives, and does not demonstrate a plan for resourcing measures required. For example, it does not demonstrate how impartial advice on switching supplier could reach all those who could benefit from switching. It cites behaviour change in households as an important driver but fails to demonstrate a plan for changing behaviours. Offering

one-off advice is known to be insufficient to actually change behaviours. An ongoing relationship between trusted parties and citizens is required to achieve behaviour change, this can be greatly facilitated by providing citizens with a certified copy of data about them, and their situation, to be held in their own Personal Data Store.

The need for a leadership role on the part of the Scottish Government

People who are fuel poor typically have many contacts with public and charitable services because fuel poverty is often just one aspect of poverty. They may also face debt issues, they may struggle to afford food, they may be in precarious work, they may be in poor quality private rented housing and factors such as illness and relationship breakdown can lead to (fuel) poverty. The draft strategy mentions some small scale partnership developments by Home Energy Scotland, e.g. with Macmillan Cancer Support. These are generally to be welcomed and built upon, however the Scottish Government should take a leadership role in supporting such developments in order that they adopt good practice from connected policy areas, e.g. Online Identity Assurance, where the benefits of a Personal Data Store service have been recognised. The Strategy needs to move beyond mentioning good initiatives to being a Scottish Government Strategy, otherwise partners may fail to fully embrace infrastructure-level developments, and consequently perpetuate organisation-centric approaches to data, when iterating and expanding such much needed responses to fuel poverty.

An outcome-focused approach

The draft Strategy sets out an ambition for an outcomes focused approach. This is to be welcomed. However an outcomes focused approach will require that siloed data be combined. Support to address fuel poverty needs to cross organisational and service boundaries of e.g. debt advice, benefits advice, implementation of subsidised and free energy efficiency measures, home energy usage advice, support to access Warm Home Discount, supplier switch, help with billing issues, and interrelation with other issues. A Personal Data Store, with citizens giving informed consent for data sharing, offers a practical way to achieve this cross-organisational relationship.

Fuel poverty is exacerbated by organisation-centric approaches to data

Existing responses to the aspects of how fuel is used in a household (behaviour change), the price paid for fuel (addressing the poverty premium by promoting price comparison and supplier switch) and income (relationship to benefits, money and debt advice) are inefficient because they have an organisation-centric approach to data about the citizens they support. They push the burden of integration onto citizens who are often amongst the most ill-equipped to repeatedly provide the same evidence and story to multiple parties. Citizens that we interacted with during the EPCAS project (a Social Innovation Fund Stage 2 project, supported by ESF and

Scottish Government) told us that they struggled in their relationships with public services, and other services that are supposed to help them, not just those services relating to fuel poverty. Citizens Advice Scotland's recent research about how people living in fuel poverty perceive their own situation suggests that uptake of services intended to help can be poor because people in fuel poverty don't define themselves as being fuel poor and would not seek help from services offering to help them as fuel poor. The ability to deal with a household starting from whichever entry point to the system they come could be a critical deciding factor in increasing uptake. Stephen McLellan, Director at Recovery Across Mental Health highlighted links between poverty, fuel poverty, mental health, health more generally and loneliness and isolation at the Holyrood Events Tackling Fuel Poverty Conference. Stephen's solutions included getting help to people sooner, providing relevant information in a timely manner and creating healthy environments. In the EPCAS project we discovered that the lack of a system to support the current process of annual application for Broader Group Warm Home Discount reduces capacity for Energy Advocates to deal with new clients but it also requires citizens to provide evidence of benefits to their Electricity supplier that they had already provided to other services. These are all things that would be facilitated or improved by Personal Centred Data services.

In summary

The combination of organisation-centric approaches to data and lack of digital enablement makes it difficult to understand the true baseline of fuel poverty, hampers efforts to target and personalise initiatives to address fuel poverty, fails to harness the input of fuel poor households to being active participants in addressing their own situation, and thwarts a true understanding of the difference made by initiatives. Equipping fuel poor citizens with Personal Data Stores, as an underpinning service, would enable a much more systematic, empowering and effective response, underpinning the generation of better responses to the aim of eradicating fuel poverty.

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

We note that the proposal is that 5-yearly reports should include:

- “1. the steps that have been taken towards meeting the 2040 target over the previous five years;
2. the progress made towards the 2040 target, and;
3. the steps that Scottish Ministers propose to take over the next five years in order to meet the 2040 target.”

As already noted above, embedding person-centred data services within the various initiatives that aim to tackle fuel poverty would lead to a significant improvement in the ability to report on (1) and (2) and to develop appropriate steps for (3). The draft Strategy, published with the Bill relies on case studies of individuals in some cases. Case studies of individuals are necessary but are insufficient to demonstrate true impact of an initiative, and the approach to bringing together a picture of outcome for the wider population that are affected needs to move beyond snapshots. In such a complex area, where multiple actors influence the outcome, making the citizen the point of integration for data collection is the only practical solution.

We also note that the proposal is that:

“Other relevant information may also be included in the strategy, for example, information about how it interacts with other related strategies or statutory requirements, such as climate change targets.”

The word “may” in the above sentence should be changed to “must”. Again, understanding the interrelation between fuel poverty and other strategies becomes much easier when underpinned by person-centred data services.