

## Health and Social Care Alliance Scotland (the ALLIANCE) Response: Consultation on a Fuel Poverty Strategy for Scotland

1 February 2017

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The Health and Social Care Alliance Scotland (the ALLIANCE) is the national third sector intermediary for a range of health and social care organisations. It brings together over 2,200 members, including a large network of national and local third sector organisations, associates in the statutory and private sectors and individuals.

The ALLIANCE's vision is for a Scotland where people of all ages who are disabled or living with long term conditions, and unpaid carers, have a strong voice and enjoy their right to live well, as equal and active citizens, free from discrimination, with support and services that put them at the centre.

The links between long term conditions, disability, poor health and wellbeing, and fuel poverty are well known. Cold, damp weather and housing can exacerbate existing health conditions (e.g. diabetes and musculoskeletal pain), cause and exacerbate symptoms of others (e.g. asthma) and even delay discharge from hospital<sup>1</sup>. As noted by the Scottish Fuel Poverty Strategic Working Group there are also strong links between fuel poverty and poor mental health<sup>2</sup>, and we know that some groups – including disabled people – are disproportionately affected by fuel poverty. Fuel poverty is also considered to be one of the main social determinants of health and health inequalities<sup>3</sup>. As such, it is of great significance to our members that we seek to address and prevent fuel poverty wherever possible.

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<sup>1</sup> Public Health England (2014) Local action on health inequalities evidence review 7: fuel poverty and cold home-related health problems:  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/357409/Review7\\_Fuel\\_poverty\\_health\\_inequalities.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/357409/Review7_Fuel_poverty_health_inequalities.pdf)

<sup>2</sup> Scottish Government (2016) A Scotland without fuel poverty is a fairer Scotland: Four steps to achieving sustainable, affordable and attainable warmth and energy use for all; Report of the Scottish Fuel Poverty Strategic Working Group To the Cabinet Secretary for Communities, Social Security and Equalities:  
<http://www.gov.scot/Publications/2016/10/2273/0>

<sup>3</sup> NHS Health Scotland (2016) Housing and health inequalities:  
[http://www.healthscotland.scot/media/1250/housing-and-health\\_nov2016\\_english.pdf](http://www.healthscotland.scot/media/1250/housing-and-health_nov2016_english.pdf)

**1) Do you have any comments on this new definition of fuel poverty, in particular, what do you think about the proposal to use AHC and MIS as means to measure fuel poverty in Scotland?**

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

We agree that reviewing the fuel poverty definition is a necessary and timely approach. As the command paper sets out, the new definition should better target those likely to be experiencing adverse outcomes associated with fuel poverty. However, we believe that any definition based on income and costs also needs to take into account the additional fiscal burden often placed on people living with long term conditions and disabled people in order to live independently and participate equally in society.

Furthermore, the proposed definition of fuel poverty is a technical, quantitative measure which does not consider the experiences of people living in fuel poverty. Whether someone lives in fuel poverty or not can fluctuate from time to time, dependent on various circumstances (e.g. household income and fuel prices changing) so a quantitative measure of fuel poverty can only provide a snapshot at a certain point in time.

The ALLIANCE recommends that any future policy takes this into account and that a holistic evaluation of the impact of the Scottish Government's strategy on the lives of people living in fuel poverty is undertaken as a matter of course. In our view, this requires a greater focus to be placed on gathering qualitative first-hand views from people living in fuel poverty themselves.

We believe that this type of information will enable the Scottish Government to better focus its resources – and to better determine which approaches are most successful.

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

Both quantitative and qualitative information should be gathered about people living in fuel poverty. This should be disaggregated to recognise the experience of people with protected characteristics and equality groups identified under the Equality Act 2010<sup>4</sup>.

Further work should be undertaken with communities, people with lived experience of fuel poverty and the third sector organisations (who often work closest to people living in

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<sup>4</sup> <https://www.legislation.gov.uk/ukpga/2010/15/contents>

fuel poverty), in order to determine and mainstream approaches that can best support people living in fuel poverty and to prevent others living in fuel poverty.

The ALLIANCE welcomes the Scottish Government recognition in the command document of the cross-sectoral nature of fuel poverty and the need to look beyond energy and income to better identify complex drivers and poor outcomes. We also welcome the reference to human rights and the International Covenant on Economic, Social and Cultural Rights. Taking a cross-cutting and rights-based approach, by forging links with other parts of the Scottish Government (including social security and health and social care), the third sector and communities, and using the rights-based 'PANEL' Principles<sup>5</sup> and tools like an Equalities and Human Rights Impact Assessment<sup>6</sup> could substantially support these efforts.

We also believe that regular, independent scrutiny process of the strategy, definition and any future legislation is built in from the start to allow for these challenges to be highlighted, mitigated or resolved where possible.

**2) Do you have any views on the proposal of using 75 years of age as a threshold for identifying those who are likely to be vulnerable to the adverse health outcomes of fuel poverty?**

In many of the most disadvantaged communities across Scotland, reaching the age of 75 is extremely unlikely. In the Glasgow areas of Ruchill and Possilpark, for example, both the male and female average life expectancy are below the age of 75<sup>7</sup>. The Scottish Government should ensure that concrete recognition of health inequalities are built into the rules for identifying people living in fuel poverty, with proper consideration of a weighted approach that recognises the reduced life expectancy of people in socially deprived areas.

We strongly endorse the proposal to undertake further work to identify health and disability categories to facilitate targeted eradication of fuel poverty. The ALLIANCE also believes that better data should be collected in relation to other demographics, particularly those with protected characteristics identified in the Equality Act 2010, in order to identify and address trends of fuel poverty across Scotland. Disaggregated data about fuel poverty amongst people living with long term conditions, for example, could enable the Scottish Government to better focus its resources towards groups who may

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<sup>5</sup> <http://www.scottishhumanrights.com/rights-in-practice/human-rights-based-approach/>

<sup>6</sup> <http://eqhria.scottishhumanrights.com/>

<sup>7</sup> [http://www.understandingglasgow.com/assets/0002/1278/Ruchill\\_and\\_Possilpark.pdf](http://www.understandingglasgow.com/assets/0002/1278/Ruchill_and_Possilpark.pdf)

be more likely to experience the adverse effects of living in fuel poverty, irrespective of age.

**3) In relation to island communities, are there any additional a. challenges ; and / or b. opportunities that we need to consider in developing our strategy?**

Any new strategy must recognise and respond to the higher living and fuel costs associated with living in island communities.

This section of the command paper is titled “Recognising the distinctiveness of all our communities” but deals with geographic communities only. We believe further emphasis should be placed on other 'communities', i.e. equalities groups ('communities of interest') that may be disproportionately affected by fuel poverty. Further information and targeted support should be considered for these groups.

**4) In relation to rural and remote rural communities, are there any additional a. challenges ; and / or b. opportunities that we need to consider in developing our strategy?**

Any new strategy must recognise and respond to the higher living and fuel costs associated with living in rural communities.

This section of the command paper is titled “Recognising the distinctiveness of all our communities” but deals with geographic communities only. We believe further emphasis should be placed on other 'communities', i.e. equalities groups ('communities of interest') that may be disproportionately affected by fuel poverty. Further information and targeted support should be considered for these groups.

**5) Please give us your views on how national partners and local delivery organisations can work better together to identify and support those at risk of, or experiencing fuel poverty? What would best support, or enable such partnerships?**

We welcome the commitments in the command paper that suggest further work will be undertaken with a range of partners, including third sector organisations, to measure effectiveness and strengthen the cross cutting nature of policy initiatives. Many of the ALLIANCE's member organisations work closely with people living in fuel poverty and, as such, can support people to take preventative measures to avoid fuel poverty and mitigate the effects of living in fuel poverty. In order to do so, however, individuals and organisations need to be adequately and sustainably resourced. We believe that the

Scottish Government should further consider approaches that bring together partners working with people in fuel poverty to benefit from economies of scale, for example through collective switching.

Developing and building on existing partnership and referral work across housing, health and social care is another opportunity. Some examples of existing practice are provided in the Strategic Working Group report and the response to this consultation by NHS Health Scotland. Cross-sectoral working with health and social care integration is essential for the links between fuel poverty, poor health and wellbeing to be adequately addressed. Health and social care staff must be adequately resourced, trained and supported to take on this role in order to help overcome any discomfort or (mis)perceptions of 'professional' boundaries that may discourage them from addressing issues around fuel poverty. The Scottish Public Health Network has developed guidance on fuel poverty for public health directors<sup>8</sup> and similar guidelines could be developed for other sectors in health and social care.

**6) What can local partners do to contribute to meeting national aims of effectively and sustainably tackling fuel poverty? This might include sharing best practice or developing strategic approaches.**

Many local third sector organisations are rooted in communities where people benefit from advice and action related to fuel poverty. We believe that any future actions should outline how local third sector delivery partners will be engaged and supported to address fuel poverty locally.

We welcome moves towards a family financial health check, however we would caution that this should not be added to the workload of over subscribed advice services without the additional resource to meet demand.

The Scottish Government should ensure a service is available that meets the needs of everyone living in fuel poverty. In the experience of our Community Links Practitioners<sup>9</sup>, who work with people in some of the most socially deprived areas of Scotland, many people living in low income households with a registered social landlord tenancy will not receive support from Home Energy Scotland or the Home Energy Efficiency Programmes for Scotland. In some cases this has been considered to widen the fuel poverty gap.

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<sup>8</sup> [https://www.scotphn.net/wp-content/uploads/2016/11/2016\\_11\\_02-Addressing-Fuel-Poverty-DPH-Guidance-Final-1.pdf](https://www.scotphn.net/wp-content/uploads/2016/11/2016_11_02-Addressing-Fuel-Poverty-DPH-Guidance-Final-1.pdf)

<sup>9</sup> <https://www.alliance-scotland.org.uk/in-the-community/national-link-programme/>

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

Improved emphasis placed on sustainably supporting and resourcing organisations in the longer term, to provide services that are proven to mitigate fuel poverty as well as the provision of independent advice and, where possible, independent advocacy.

**8) How can the Scottish Government best support local or community level organisations to accurately a. measure; b. report on; and c. ensure quality of provision of advice and support services and their outcomes?**

Many organisations will require sustainable levels of funding to achieve such an approach. The Scottish Government should consider how funding can reach local organisations and encourage innovative measures of measuring, reporting and ensuring quality without overly onerous requirements that detract from the provision of frontline services.

**9) How can the one-stop-shop approach be enhanced for the benefit of HES clients; and in particular, a. Are there any improvements that you think can be made to the HES service to further enable it to best reach the most vulnerable to fuel poverty client groups?**

In order to reach the “most vulnerable” further data is required on who they are, where they live, and, as earlier suggested, the outcomes for them of living in fuel poverty. The voice of lived experience must be included in the design and delivery of services related to fuel poverty so that it can be identified directly by those who know what is required.

Ensuring that all frontline workers – irrespective of professional sector – who may come into contact with people living in – or at risk of – fuel poverty have access to reliable, up-to-date information in order to support ‘mutual signposting’<sup>10</sup> can help ensure people get the right support at the right time.

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

We welcome the proposal to set targets, which is one way of ensuring accountability in a rights-based approach. However in order to ensure full accountability there needs to

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<sup>10</sup> <https://www.alliance-scotland.org.uk/wp-content/uploads/2017/10/ALLIANCE-Developing-a-Culture-of-Health.pdf>

be independent scrutiny of any established measures and opportunities for redress if these are not met. The ALLIANCE believes that the proposal should be to eradicate fuel poverty in the Warm Homes Bill. At present the target is to reach less than 10% living in fuel poverty by 2040. We believe that any 22-year strategy should seek to go beyond this and find measures that eradicate fuel poverty (as in to completely put an end to fuel poverty) by the end of this period.

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

It is difficult to give a view on the proposed sub-targets without the background information as to how they have been arrived at. The ALLIANCE also believes that it is important to cross-reference the proposed targets with other policy goals that align with fuel poverty, including (but not limited to) child poverty, health inequalities, public health, social security and mental health.

We are concerned that whilst energy prices remain outside of Scottish Government control, alongside uncertainty about the proposed publicly owned energy company, that these may be unrealistic targets.

As noted above, we believe that it is imperative that qualitative outcome measures and data gathered from people with lived experience of fuel poverty (disaggregated related to equality groups) are used to measure the success of these milestones. This should sit alongside quantitative data to allow a holistic picture of the role the strategy is playing in addressing fuel poverty.

**12) What are your views on the proposed interim milestones? a) What are your views on the proposed levels? b) What are your views on the proposed timeframe?**

It is difficult to give a view on the proposed sub-targets without the background information as to how they have been arrived at.

We are concerned that whilst energy prices remain outside of Scottish Government control, alongside uncertainty about the proposed publicly owned energy company, that these may be unrealistic targets.

We believe that a further date should be included before 2030 at which milestones can be measured. At present this would allow for a 12-year period before the Scottish

Government would need to report on progress. We believe an ongoing cycle of report, review and analysis is required to make the changes identified.

As noted above, we believe that it is imperative that qualitative outcome measures and data gathered from people with lived experience of fuel poverty (disaggregated related to equality groups) are used to measure the success of these milestones. This should sit alongside quantitative data to allow a holistic picture of the role the strategy is playing in addressing fuel poverty.

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

The ALLIANCE believes that people with lived experience of fuel poverty should be front and centre of both Panels – advising on the next steps the Scottish Government should take to meet its targets and milestones. The previous Scottish Fuel Poverty Forum contained significant representation from the third sector, health and community organisations. We believe that this could be extended with further representation from various equality groups representing people from the various protected characteristics identified in the Equality Act 2010. The role and effectiveness of the Experience Panels that have been established under the devolution of social security could be evaluated with a view to providing a role-model for one way in which people with lived experience of an issue can be included in the decision-making process.

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

Initial priorities should include identifying qualitative data gaps and partnership opportunities with people with lived experience, communities, the third sector, academia and across Government to develop a better understanding about the views and experiences of people living in fuel poverty.

Another priority would be to seek consultation and collaboration with human rights bodies like the Scottish Human Rights Commission, partners involved in Scotland's National Action Plan on Human Rights to explore how the fuel poverty strategy and Warm Homes Bill can best contribute towards the progressive realization of the right to an adequate standard of living.

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

The ALLIANCE's view is that proxies are an inappropriate form of measuring fuel poverty, especially given the variety of complex circumstances that can lead to a household experiencing fuel poverty. We believe that any doorstep tool used should seek to adequately identify the individual experiences of various equalities groups, including disabled people and people living with long term conditions and unpaid carers.

**19) What are your views on, or experience of how an outcomes-focused approach would work in practice? a) Would it encourage national and local policy and delivery partners to work together effectively, and if not, what alternative approach(es) do you propose could be used instead?**

The ALLIANCE welcomes the move towards an outcome-based approach. The plan and process set out in the command paper requires to be 'SMART' tested<sup>11</sup> to ensure that it can be adequately measured, with milestones and indicators attached to each of the intermediate and long-term outcomes.

Specialist advice on outcome-based approaches is available from Evaluation Support Scotland<sup>12</sup>. The ALLIANCE also believes that learning could be sought from the health and social care integration team within Scottish Government who have recent experience of developing an outcome-based approach to the implementation of Government policy.

Some other influential policies and programmes the Scottish Government may wish to consider including in the draft outcomes model include: the Fair Work Convention, Scottish Living Wage, Gender Pay Gap, New Scots Refugee Integration Strategy, and the Health and Social Care Delivery Plan.

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

The third bullet point notes that the Scottish Government intends for the needs of individuals and families to be at the heart of service design and delivery. We believe that the Scottish Government should seek to clarify how it intends to identify the needs and what level of support it will provide to people living in fuel poverty in order to be involved in the design and delivery of support and services. The Scottish Government should also note the difference between a "needs based" approach and a "rights based" approach. Under a needs based approach dialogue is sought with people about what they require, whereas a rights based approach moves away from treating people as

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<sup>11</sup> SMART: Specific; Measurable; Achievable; Realistic; Time-framed.

<sup>12</sup> <http://www.evaluationsupportscotland.org.uk/>

“beneficiaries” and recognises the Scottish Government’s obligations to ensure people’s human rights are met.

**21) In your opinion, would the proposed framework help to strengthen partnerships on-the-ground? a) If so, how? b) If not, why?**

A sub-aim of the framework should be to strengthen partnerships on the ground between different areas of the Scottish Government, local government, the third sector and community groups in meeting the challenge of eradicating fuel poverty.

Our Community Links Practitioners report that in Glasgow registered social landlord tenants wait longer for stock upgrades that would improve their home efficiency and struggle to access already overprescribed citizen advice bureaus that would facilitate income maximisation. Closer partnerships should be built with social landlords across Scotland to address delays and gaps in the provision of support.

**22) Do you think any of the proposals set out in this consultation will have an impact, positive or negative, on equalities as set out above? If so, what impact do you think that will be and, if negative, how do you think these could be mitigated?**

The ALLIANCE believes that a new fuel poverty strategy is a good opportunity to revisit the issue from an equalities (and human rights) perspective, as has been identified throughout our consultation response. At present, little or no analysis has been done on the real impact of fuel poverty on the lives and experiences of people from various equality groups. As the Equality Impact Assessment points out, there are a range of drivers and causes of fuel poverty in Scotland, but rarely is it noted that how people identify, and are therefore treated, impacts on their experience of poverty.

Protected characteristics identified in the Equality Act 2010 offer a framework with which to consider the various impacts of fuel poverty on a variety of people most likely to be disproportionately impacted by poverty. The ALLIANCE believes that developing a variety of qualitative and quantitative means of identifying these impacts should be a key priority for the implementation of the strategy – not just the completion of an assessment of its impact before it is implemented. Using tools like the Equality and Human Rights Impact Assessment<sup>13</sup>, developed by the Scottish Human Rights Commission and Equality and Human Rights Commission, could be one opportunity.

**For More Information**

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<sup>13</sup> <http://eqhria.scottishhumanrights.com/>

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