Thank you for providing the opportunity for the Energy Saving Trust to provide evidence to the Committee’s call for evidence on the Fuel Poverty (Target, Definition and Strategy) (Scotland) Bill. Please find following our written submission.

The Energy Saving Trust and our fuel poverty work

The Energy Saving Trust is funded by the Scottish Government to reduce carbon emissions and tackle fuel poverty by reducing household fuel bills, increasing household income and making homes warmer and more comfortable through energy efficiency advice and information and enabling access to support. This includes managing the Home Energy Scotland advice network to:

- Provide support to c. 90,000 households a year, including more than 33,000 low-income, potentially fuel-poor clients. For these potentially fuel-poor clients this support includes:
  - Providing energy advice to vulnerable households, including face to face at events and including a home visit for those households for whom advice over the phone is insufficient and where there is no local energy advice outreach service. The home visit service makes about 800 visits per year.
  - Providing referrals for benefit and tax credit checks.
  - Providing referrals for tariff support from the customers’ own electricity/mains gas supplier.
  - Providing referrals for free, impartial, advice and handholding support on switching energy supplier.
  - Providing referrals to Warmer Homes Scotland for eligible households.
  - Providing referrals to other national energy efficiency programmes.
  - Providing referrals to HEEPS ABS, local ECO HHCRO and other local energy efficiency schemes for eligible households.
  - Referring and signposting vulnerable households for other relevant support such as debt or money advice, fire safety checks, enabling support such as loft clearance or handyperson services, local energy advice and advocacy services, etc.
- Develop and maintain partnerships and referral pathways with trusted intermediary organisations to reach vulnerable households who are less likely to come forward for support without this impetus.
• Provide strategic support to local authorities, housing associations and community organisations to help develop energy efficiency initiatives to alleviate fuel poverty.
• Target advice and information on private landlords to increase the energy efficiency of the private rented sector.

Home Energy Scotland is also currently running a pilot project, on behalf of the Scottish Government to trial the Energycarer approach developed by Lochalsh and Skye Housing Association to address rural fuel poverty for people with a health issue.

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?**

The Energy Saving Trust supports the Scottish Government’s proposal to set a new statutory target to reduce fuel poverty in the Warm Homes Bill.

We note that the time that will have elapsed between the 2001 establishment of the original target to eradicate fuel poverty target and the newly proposed date of 2040 by which 5% of households will live in fuel poverty, is 39 years. While we accept that, as outlined in the original consultation document ‘there are a number of factors which contribute to fuel poverty levels‘ which remain beyond the control of the Scottish Government and we understand the need to set a target that is achievable, it is extremely unfortunate that, under current proposals, fuel poverty will remain part of many householders’ lives for many years to come and that many older (and indeed middle aged) people in Scotland will not see an end to their fuel poverty in their lifetimes. We therefore believe that the date by which the fuel poverty target should be met should be brought forward.

We also believe that the interim milestones proposed in the 2018 Fuel Poverty Strategy, which was published at the same time as the Bill, should be statutory targets and as such be featured in the Bill.

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

Yes, the Energy Saving Trust agrees with the Scottish Government’s proposals for a revised definition of fuel poverty. As noted in our response to the Scottish Government’s original consultation, the new definition will place more emphasis on households with lower incomes and high housing and fuel costs than is the case under the current definition and as the consultation document noted this should result in it being better targeted ‘on those likely to be experiencing the adverse outcomes associated with fuel poverty…’. We therefore welcome the proposed new definition of
fuel poverty, and support the proposal to use AHC and MIS as means to measure fuel poverty in Scotland.

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? Please explain your reasons why.

Yes, the Energy Saving Trust agrees with the provisions in the Bill that require the Scottish Government to publish a fuel poverty strategy. While, as others have pointed out¹, the Scottish Government can publish a fuel poverty strategy whenever it wishes, by requiring in legislation the publication of new fuel poverty strategy the Scottish Government is sending a clear signal that fuel poverty should have no place in Scotland’s future. Given the significant scale and impact of fuel poverty in Scotland this is important.

We note that the Fuel Poverty Strategy commits the Scottish Government to undertaking ‘a review of delivery of the strategy to 2030 and recommend further action to take to meet the 2040 target and associated sub-targets. This would be undertaken by 2031’. We think that it would be helpful to enshrine this commitment in the legislation. However, we believe that a more regular review would be desirable as would a commitment to update the strategy in light of each review. As such we would like to see a requirement in the legislation for the delivery the strategy to be reviewed on a 5-yearly basis and for the strategy to be updated in light of the findings of each review.

The Energy Saving Trust also agrees with the consultation requirements set out in relation to the strategy, in particular that in the preparation of the strategy the Scottish Government must consult ‘such persons as they consider appropriate’ including ‘individuals who are living, or have lived, in fuel poverty’.

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?

The Energy Saving Trust believes that the measures set out in the draft Fuel Poverty Strategy for Scotland 2018 will make a considerable contribution to meeting the Scottish Government’s new fuel poverty target.

We are able to say with some certainty that lessons have been learned and continue to be learned from the relevant programmes that we deliver on behalf of the Scottish Government and that these programmes continue to evolve to reflect these. For example, we know from experience that the most vulnerable Home Energy Scotland clients may come forward for support only through other organisations because they have a relationship and trust that other organisation. An increasing part of Home Energy Scotland’s work over recent years has therefore been to actively work to build partnerships with organisations whose clients Home Energy Scotland is likely to be able to assist. Indeed, there are now a wide variety of local (for example North West Sutherland Citizens Advice Bureau, Aberdeen Multicultural Centre, Communities for Conservation), regional (for example Scottish Power Energy Networks) and national partnerships in place (including for example MacMillan Cancer Support, Age Scotland, Council of Ethnic Minority Voluntary Organisations (CEMVO) Scotland and Equality Scotland), and around 20% of Home Energy Scotland customers now reach Home Energy Scotland as a result of our partnership work.

The development of such partnerships continues to be a key and growing part of the work Home Energy Scotland undertakes to support the HEEPS (Home Energy Efficiency Programmes for Scotland) programmes. The importance of building and developing such partnerships is highlighted in the fuel poverty strategy that notes that the Scottish Government will 'continue to build on and develop emerging and diverse partnerships across various sectors, to ensure we are engaging proactively and effectively with the most relevant organisations and bodies to maximise reach of this strategy and support to those most in need'.

It is also worthwhile noting here that Home Energy Scotland proactively encourages feedback from customers, partners and other stakeholders as well as our advisors and use this to inform on-going development of Home Energy Scotland and other Energy Saving Trust services to ensure they meet customers’ needs. Indeed, Home Energy Scotland won the ‘Best Customer Focus’ category at the Summer 2018 Best Business Awards for its success in putting the customer first. Commenting on Home Energy Scotland’s win in the Best Customer Focus category, the chairman of the judges’ panel said: ‘Home Energy Scotland has transformed its service by focusing on customers instead of statistics and targets. It identified a need for change and refocused services by putting the customer at the heart of everything it does…By improving its services, the government-funded organisation is improving the quality of life for its customers helping them save energy and reduce their fuel bills.’

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

The Energy Saving Trust agrees that regular reporting on the steps that have been taken towards meeting the 2040 target, the progress made towards the 2040 target and the steps that Scottish Ministers propose to take in order to meet the 2040 target
will be important. However, we would like to see reporting on a more frequent basis than 5-yearly as currently set out in the draft Bill. We believe that reporting should be undertaken on an annual basis.

As well as reporting on progress towards the 2040 target we believe that there should be a requirement that the strategy’s interim milestones are also reported against – in the same way as is proposed for reporting against the strategy’s 2040 target, i.e. reporting on the steps that have been taken towards meeting each of the interim targets, the progress made towards each of the interim milestones and the steps that Scottish Ministers propose to take in order to meet each of the interim targets.

In much the same way that the Climate Change (Scotland) Act 2009 requires that where annual targets are not met Scottish Ministers must ‘lay a report before the Scottish Parliament setting out proposals and policies to compensate in future years for the excess emissions’ we believe that a similar mechanism needs to exist within the Fuel Poverty Bill to ensure that where it is clear that fuel poverty targets are unlikely to be met then there is a requirement to put a clear plan in place to ensure that they are. We therefore think that the Bill should include provisions to ensure that if there has not been sufficient progress towards meeting the fuel poverty target by a set point before the deadline (e.g. 5 years before the deadline), there should be a requirement to produce a fully resourced plan which will ensure that the target will be met on time. Finally, we recommend that the Bill includes a requirement to report using a common metric that would allow comparison of the relative levels of fuel poverty across the UK.

As noted in our response to the Scottish Government’s original consultation ‘as an organisation working on fuel poverty across the UK we would be grateful if Scottish Government policy makers would continue to work with BEIS, Welsh Assembly Government and Northern Ireland Government to ensure that a common metric – and published statistics - are available to consider relative levels of fuel poverty across the different administrations of the UK. As some policy measures to address fuel poverty (notably ECO) are undertaken from UK government on a cross-GB basis it is important that we are able to discuss the scale of the problem across the country.’