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Our Ref: MS/CA/FPAG  
Your Ref: -

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Dear Ms Constance

## **Consultation of a Fuel Poverty Strategy for Scotland – Response**

Thank you for the opportunity to respond to the consultation on a Fuel Poverty Strategy for Scotland. Please find attached Shetland Fuel Poverty Action Group's response to the consultation.

This letter is to stress our concern that the consultation is focused on the definition of Fuel Poverty, rather than providing an opportunity to have a dialogue about the issues and on what needs to be done to tackle fuel poverty. Historically, in remote and rural Scotland, there has been a lack of investment in effective solutions; no change in definition is going to alter this.

We would be keen to work the Government, alongside other island areas, in order to focus on developing and implementing solutions, in partnership. We feel this is the best way to improve living conditions and outcomes for our most vulnerable people and have a real impact on levels of fuel poverty.

Yours sincerely

Director of Infrastructure Services

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## QUESTIONS

- 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?

We generally welcome the move towards the use of AHC and the MIS in the proposed new definition of fuel poverty. We acknowledge the shortcomings of the existing definition as highlighted by the Independent Panel.

However, our support is crucially caveated, and we would not support full implementation without further consideration and clear outline of the methodology.

### After Housing Costs

The proposal to shift the calculation used in defining fuel poverty from *before* housing costs to *after* housing costs is positive. However, we are disappointed that there is a lack of clarity on the precise inclusions and exclusions of 'housing costs', such as Council Tax, repairs and maintenance. The move to after housing costs is only a positive if it accounts for the true housing costs. In "A new definition of fuel poverty in Scotland – A review of recent evidence" it is stated that "some households have negligible housing costs because they are outright home owners." (page 121). We would contend that this ignores the very real challenge of repairs and maintenance of older properties in a remote and rural location such as Shetland. We need further clarity on this issue.

### Minimum Income Standard

We are extremely concerned and disappointed that the use of the UK MIS does not adequately reflect the higher costs of providing warm homes, in Shetland. It is essential that the MIS Thresholds are adjusted for households living in remote rural areas.

The proposed new definition does not follow the recommendations from the Independent Panel, in which an adjustment upward for households living in remote rural areas was proposed. The justification for this is that the proposed measure already includes an adjustment for remote and rural areas. We do not feel this is the case and our submission includes examples that demonstrates this.

In the consultation document you suggest that these remote rural elements are inconsistent with the broader approach taken by Scottish Government in measuring income poverty and policy towards national minimum and living wages. We would seek clarification if this stance is consistent with the Ministerial Foreword that: "Everyone should have enough money in their pocket to pay the essential costs of housing and energy and still be able to lead a healthy and decent life."

If the new methodology is not able to account for actual income and expenditure variations in island and remote rural areas we would wish to see the existing definition retained.



We have real concern that the rollout of this definition will under represent the real extent of fuel poverty in the isles. As a consequence, we fear that the necessary resources required to address fuel poverty will be diminished

Through two examples below we will demonstrate the real impact this policy decision not to adopt rural MIS has.

You state in your proposed second test, that if after the housing and fuel costs are deducted, the household would have less than 90% of Scotland's Minimum Income Standard (MIS1) as their residual income from which to pay for all the other core necessities commensurate with a decent standard of living.

In the example below, our island householder does not meet the second test, despite the fact their residual income after housing and fuel costs is £8400, some £6341 less than the relevant MIS (after deducting actual housing and fuel costs). In fact their residual income is only 57% of the Minimum Income Standard. It is clear from this that there will be extreme poverty and disadvantage for this householder.

The table below also includes a comparator: the same householder located in an urban setting – with higher housing costs due to council tax interest payments due to higher house prices (housing costs up to £4500) and lower fuel bills (down to £1200) due to access to mains gas and lower heat demand. This householder now meets Test 2, with residual income of £7800 (row E). They also experience a shortfall on the MIS of £994 (residual income only making up 89%).

		Household 1	Household 2
	Household Type	Single working age individual in privately owned (mortgaged) home	Single working age individual in privately owned (mortgaged) home
	Location of Home	Unst, Shetland	Scottish Mainland city on Mains Gas
(A)	Income after tax and NI	£13500	£13500
(B)	Housing Costs	TOTAL = £3500	TOTAL = £4500
(C)	After Housing Cost Income*	£10,000 (=A-B)	£9,000 (=A-B)
(D)	Minimum Deemed Fuel Costs to reach 21c and 18c	£1600	£1200
(E)	Residual income after housing and fuel costs deducted,	£8400 (=A-B-D)	£7800 (=A-B-D)
(F)	Test 1 Fuel cost as percentage of AHC	19% (= D / C)	15% (= D / C)

(G)	Test 2 -	96% (= E / 8794 )	89% (= E / 8794 )
	Classified as in Fuel Poverty	No	Yes
Minimum Income Standard			
(G)	Minimum Income Standard for Remote Rural – remote from town in the Northern Isles	£14,741	
(H)	UK Minimum Income Standard*		£8,794
	£s shortfall on income to pay for all the other core necessities commensurate with a decent standard of living.	£6,341 (= G-E)	£994 (= H-E)

\* In absence of a MIS for urban Scotland, UK MIS figure has been used.

So the householder living on a Shetland Island will need to spend a higher percentage of their bill on fuel but yet not meet the new proposed definition of fuel poverty. While we share the Government aspiration to eradicate fuel poverty, we have a real fear that funding and resourcing to take this household out of fuel poverty will not be forthcoming and directed to other areas if this proposed definition is adopted. This is despite the real hardship this householder (and many others like them will suffer) as evidenced by the MIS shortfall.

Another example below, again shows that a family who currently meet the definition of fuel poverty, will no longer meet the definition. This is despite having a shortfall of income to pay for all other necessities of £16,606.

		Household 3
	Household Type	Working family, two children incroft property
	Location of Home	Whalsay, Shetland
(A)	Income after tax and NI	£25000
(B)	Housing Costs	Council Tax £1300
(C)	After Housing Cost Income*	£23,700 (=A-B)



(D)	Minimum Deemed Fuel Costs to reach 21c and 18c	£2800
(E)	Residual income after housing and fuel costs deducted,	£20,900 (=A-B-D)
(F)	Test 1 Fuel cost as percentage of AHC	12% (= D / C)
(G)	Test 2 -	91% ( = E /21932 )
	Classified as in Fuel Poverty	No
	Minimum Income Standard	
(G)	Minimum Income Standard for Remote Rural – remote from town in the Northern Isles	£36,106
	£s shortfall on income to pay for all the other core necessities commensurate with a decent standard of living.	£16,206 (= G-E)

N.B. We have had to create these case studies in the absence of a clear definition of After Housing Costs (AHC) being included in the Consultation document.

Without using the Remote Rural Scotland MIS in the proposed Definition of Fuel Poverty then the Scottish Government will fail to meet the commitment of principle in its Fuel Poverty Strategy consultation document (p23), namely that *"The fuel poverty strategy will be firmly based on the principle of social justice and creating a fairer and more equal society; irrespective of whether individuals live in urban or rural Scotland."* We are concerned that the Scottish Government is not using all robust available evidence to inform the definition, understanding and analysis of Scottish fuel poverty levels.

The evidence we provide here demonstrates that the rural factor is not reflected in the way that the Scottish Government is proposing to calculate fuel poverty. This is due to the impact of the second test and despite the evidence base being available through the Remote and Rural MIS.

- a) What, if any, challenges do you think this approach could present in enabling targeting of resources to those most vulnerable to fuel poverty; and
- b) If this definition is to be used, how would you propose these challenges are overcome?

While we are supportive of the move to the new definition, we do not believe that it is fit to be fully rolled out in its present format. The new definition must fully identify all aspects of fuel poverty and the proposed "one size fits all" approach being put forward does not do this. We support and acknowledge the views of the expert panel that the MIS must reflect the remote, rural households and the vulnerable.

Use of the proposed definition could lead to resources being diverted away from the parts of Scotland where fuel poverty is highest and solutions are more complex and

resource intensive. This includes Shetland. As shown in the worked examples and case studies, above, the proposed definition will potentially result resources shifting away from low-income families and single-households living in Shetland, and away from our more remote areas, further increasing inequalities of place and people.

The proposed definition is very complicated to use and understand, raising concerns about establishing eligibility and effectively targeting resources.

It should also be noted that there is a lack of clarity over how local fuel prices will be used in the proposed calculation, given their fluctuation and diversity in an island setting. We would welcome details on how the Government proposes to account for this.

**If the proposed definition is used, then a weighting to reflect the issues faced in remote rural and island areas would need to be included in any funding formula, particularly families.**

**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?**

Use of age, alone, as a threshold, is very blunt for identifying and supporting those who are vulnerable to adverse health outcomes. As our submission shows, it is families and single households who are potentially going to be negatively impacted upon most by use of the proposed new definition.

The principal aim of a new fuel poverty strategy should be to ensure that all such vulnerable people are a) identified and b) are then guaranteed to receive all the personalised help and support they need to resolve their fuel poverty problems satisfactorily, wherever they happen to live in urban or rural Scotland. Using purely arbitrary age thresholds would represent a very inadequate substitute for the full-on outreach commitment that is required to make sure that an effective new fuel poverty strategy actually finds and relieves its prime targets.

A higher age threshold could negatively affect many older people on low incomes, but with low housing costs, regardless of whether they have higher fuel costs. These people will not be classed as fuel poor, which becomes especially concerning if the new definition is used to determine eligibility for funding and assistance.

**Evidence of need should inform policy, where it exists. The proposed change does not appear to be supported by evidence.**



- 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?

Due to the timing of this consultation and the lack of clarity in certain areas we have been unable to fully assess the impact that the new definition will have on fuel poverty in Shetland. In light with the emerging Islands Bill, it is absolutely clear to us that a full islands impact assessment must be undertaken and the Strategy island-proofed.

We need the Scottish Government to recognise the challenge across the Highlands and Islands with dealing with unique housing types. The data in the Tables below show the **energy efficiency** standards in island properties are worse than the Scottish average, and this increases the more remote your property is from population centres.

	E	D	C	Grand Total
Central	52	26	1	118
Fair Isle	4	10	1	15
Lerwick/Bressay	51	70	10	147
North Isles	49	21	3	137
North Mainland	21	9	1	60
South Mainland	50	15	1	105
West	11	7		52
<b>Grand Total</b>	<b>238</b>	<b>158</b>	<b>17</b>	<b>634</b>

Table showing numbers of properties within SAP rating bands, by area.

	Below	Above	Grand Total
Central	109	9	118
Fair Isle	12	3	15
Lerwick/Bressay	96	51	147
North Isles	128	9	137
North Mainland	57	3	60
South Mainland	97	8	105
West	52		52
<b>Grand Total</b>	<b>551</b>	<b>83</b>	<b>634</b>

Table showing numbers of properties rated as being Above (and at) or Below the Scottish National Average SAP rating (61) by area.

The Scottish Household Condition Survey (SHCS) states that Shetland has the highest percentage of properties in SAP rating E-G, of any Scottish Local Authority area. It is a concern therefore that, the proposed definition of fuel

poverty may significantly reduce the percentage of households in Shetland that are considered fuel poor. We believe that inevitably funding mechanisms for retrofit energy measures will be redirected if the new standard is adopted; away from those most in need of assistance to improve the standard of their properties.

In a recent survey of the Shetland population, higher levels of fuel poverty were shown to be in the more remote areas. The survey demonstrated that by locality Shetland has between 46% and 64% fuel poverty – the highest levels being in the North Isles and the lowest in the central mainland commuter belt of recently built houses

The same survey showed that 30% of respondents said they were **not adequately heating their homes**, expressing a **fear of moving further into debt** if they did. This is not surprising, given the evidence in the Remote and Rural MIS; this shows that people are making difficult choices about how to spend their income on basic requirements for living.

Of those survey respondents not heating their homes adequately 77% were single persons; 12% were 2 adults; 11% of households included children; 52% included people over 65.

The highest number of respondents to the survey in fuel poverty by tenure were owner occupiers – 46% (these will be most adversely affected in Shetland by the new definition)

Of the households identified in the survey as being in fuel poverty 62% lived in their own home and 61% included people aged over 65.

Table 1 in the Scottish Government's 'Interim Equality Impact Assessment Record' shows that fuel poverty levels in **Over 65 households** will fall from 46.6% (using the Boardman definition) to 25.9% (proposed new definition) and from 52.9% (Boardman) to 26.9% (new) for **Over 75s**.

Similarly, the fuel poverty levels of **owner-occupiers** will fall from 45.1% (Boardman) to 20.9% (new) and households living in the least energy efficiency rated houses (EPC bands E and F-G) will fall from, respectively, 50.4% (Boardman) to 26.2% (new) and 69.8% (Boardman) to 31.8% (new). The justification for these huge downward readjustments rests on a presumption that a large proportion of pensioner households are likely to be owner-occupiers with relatively high incomes/good pension plans etc.

However, evidence suggests that this assumption is seriously misleading when applied to **pensioner households** living in the Islands context:

- Census-based demographic evidence shows that predominantly remote rural areas have significantly higher proportions of elderly people than the Scottish average;



- A much higher proportion of elderly people living in the Islands are owner-occupiers, many of them live in detached, pre-1980, energy inefficient (EPC bands E,F & G) croft-houses; and
- A significantly higher number than average live alone.

In other words, age profile, tenure, house type, owner-occupation and disposable income patterns are significantly different in the Islands – particularly in its off-gas areas and traditional crofting communities where, evidence also shows, energy consumption levels and fuel prices are much higher than the Scottish average.

It is necessary, given the consequences of this proposed change in definition, that a full islands impact assessment is undertaken, with action taken to mitigate any negative consequences. We look forward to being part of this process.

We support the aspiration to remove inadequate energy efficiency in properties as a driver of fuel poverty and we acknowledge that the Government consulted on SEEP and Energy Strategy and is still to respond to feedback from the consultation on.

We have welcomed the funding into Shetland through the HEEPS programme and in particular the ability to tailor our Area Based Scheme so that it targets those individuals in fuel poverty. There has been some recognition of the challenges of delivering in island locations through uplift in grant funding available to householders.

However this does not reflect the true cost of actual delivery in the islands. The information in the table below shows the indicative costs for measures as set out on the EPC against the cost of measures delivered within Shetland. The freight costs within the islands means that where measures are being installed in houses on the more remote islands householders have additional costs compared to mainland Shetland.

Measure	Under Floor Insulation	Flat Roof Insulation	Cavity Wall Insulation	Room In Roof Insulation	Loft Insulation (top up)	IWI (solid wall)	Insulated Door	Boller replacement	Storage Heaters
Indicative Cost according to EPC	£800 - £1200	£850 - £1,200	£500 - £1,500	£1,500 - £2,700	£100 - £350	£4,000 - £14,000	£1,000	£2,200 - £3,000	£1,200 - £1,800
Average cost paid with HEEPS:ABS Grant	£2,232.62	£2,417.86	£1,464.60	£4,648.03	£928.18	£5,278.60	£2,476.13	£5,481.75	£4,177.04

The realities of delivering in our island setting must be fully accounted for in the new strategy. Island proofing will need to evidence the impacts and mitigate against any negative impacts, such as:

- Fuel: cost, and lack of mains gas;
- The challenge of living in a high cost economy;
- Geography: weather and latitude;
- Housing: efficiency and standards.

One of the ways that island proofing could provide positive mitigation would be better use of Cold Weather Payment and Winter Fuel Allowance.

In your consultation document you highlight that there are also island-specific opportunities, including a more readily identifiable community, strong local relationships extending to a tradition of self-sufficiency in many places, and a resource-rich, high quality environment that supports good quality of life.

While this may be the case, it must be acknowledged that while these are true it does not move away from the fact that the cost of living can be as much as 68% higher in our islands as opposed to mainland locations.

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

As above re use of Remote and Rural MIS.

While it is recognised that Islands have received more HEEPS funding compared to urban areas, it should be noted that the cost of energy efficiency works are significantly higher in rural and island communities. It should also be highlighted that HEEPS does not cover social housing.

- 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?

The following would be important considerations:

- National organisations and programmes will be required (including through monitoring) to adapt delivery to fit with local context;
- Clarity over the roles, responsibilities and remit of different partners and delivery organisations;
- Clear lines of communication; and
- A recognition that regular face-to-face awareness raising sessions with front-line staff on identification of fuel poor households, and how to sign post / refer to local services.

We have developed a very effective virtual one-stop-shop with our CAB, working with NHS Shetland, HES and the Council.

Shetland operates an effective model through its one stop shop Energy Advice Service. This service is delivered by the Shetland Islands Citizens Advice Bureau (CAB) at its main office and through outreach in rural and island health centres with home visits as appropriate. The CAB Energy Adviser supports clients to maximise their incomes, resolve debt problems, understand their energy bills and heating systems, become more energy efficient, and, where appropriate, to switch tariff. The Energy Adviser refers clients on to Home Energy Scotland (HES) and the Local Authority for support with installing energy efficiency measures. Referrals are

processed through the HES portal. The CAB Energy Adviser provides a "hand-holding" service for vulnerable clients who need help in their dealings with energy providers and with following up on the installation of energy efficiency measures. As a trusted local provider delivering a community-based service, CAB is effective at reaching households who might not otherwise access the service. Location of the service in health centres enables direct referral of clients with health issues. Part of the role of the Energy Adviser is to raise awareness of fuel poverty, its impacts and ways to tackle it. A regular programme of promotional presentations is delivered to professionals and community groups across Shetland to encourage more people to access the service either independently or through referral.

The service is linked into national provision through CAB's membership of Citizens Advice Scotland which enables the Shetland Energy Adviser to participate in national fora and training. The service also participates in national campaigns such as "Big Energy Saving Week".

The Energy Advice Service reports to the multi-agency Shetland Fuel Poverty Action Group (FPAG). This ensures the service is accountable locally and that targets are being met. The FPAG is also able to feed directly in to the operation of the service, to assist in resolution of issues and to enhance partnership working.

Fuel poverty is extremely difficult to tackle in Shetland (harsh climate, off-gas, many hard-to-treat properties, high energy costs and limited opportunities for switching due to restricted tariffs). This means that the income maximisation element of CAB's Energy Advice Service is particularly important: if it is not possible to significantly cut energy bills through energy efficiency measures or switching, increasing household income has the most impact on increasing the ability of people to heat their homes adequately. This approach ties in with the Scottish Government priority to address under-claiming of benefits. The CAB Energy Advice Service has identified under-claiming as a particular issue for older people in Shetland. Examples of the huge impact of income maximisation are given below:

- Single pensioner on State Pension and Pension Credit receiving £7,649 pa helped to claim Attendance Allowance and Disability Premiums thereby increasing income to £16,315 pa.
- Pensioner couple with State Pension and private pension receiving £23,385 pa helped to claim Attendance Allowance thereby increasing income to £32,027 pa.
- Pensioner couple with State Pension receiving £14,471 pa helped to claim Attendance Allowance and Pension Credit thereby increasing income to £28,117 pa.

In each of these cases, the pensioners were living in older properties with non-functional or inefficient boilers/storage heaters and contacted CAB as they were struggling to heat their homes. In addition to income maximisation, they were referred through the HES portal for support with this. Their increased income enables these pensioners to spend more on heating their homes.

Developing and supporting a Scotland wide network of locally based and locally trusted "energycarer" organisations which provide an energy carer model and quality of holistic advice and support to fuel poor and vulnerable households



**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.**

The following can contribute:

- Strong partnership working at strategic and operational levels;
- Sharing of resources to achieve improved outcomes for households;
- Front-line staff able to prioritise identification of vulnerable households, and signpost or refer to specialist services; and
- Virtual one stop shop approach, which is able to reach our most vulnerable households (see Qu 5).

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

A combination of national monitoring and local case studies. For example, in a recent CAB case study, a pensioner couple household were supported through the Fuel Poverty Service, receiving an additional £10,000 / year in unclaimed benefits. There is clear evidence that a co-ordinated person centred approach to each household can address the key drivers of Fuel Poverty and even address low income.

**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?**

Scottish Government needs to recognise and champion the high value and critically important service delivery roles of locally-embedded, locally-focused and locally trusted service delivery organisations

Scottish Government should provide long term and sustainable revenue funding support to all such local trusted organisations to deliver the required, outcomes but tied to an essential quality test requirement to systematically measure and report on all the affordable warmth outcomes and other benefits they help secure for their clients.

Community level organisations and third sector groups which are in receipt of national grants or other funding are already monitored in respect of these grants. It would be unnecessarily onerous to add to this and the Scottish Government should consider:

- what data is required
- how it should be used.

- 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?**

Our local CAB works very closely with our HES service: the former is able to reach, support and refer to HES (as relevant), our more vulnerable households, whilst HES is able to refer to CAB for softer, more intense support, including access to CAB's Financial Health Service.

There may be additional benefits from linking in with the Scottish Government's locally based Social Security Agency.

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

A statutory target is beneficial; however, it is essential that the Definition of Fuel Poverty fully incorporates rural and island characteristics before any target or sub-target is set (see response to Qu 1, above).

It is essential that all elements of reducing fuel poverty are in place, functioning effectively and efficiently and are well resourced in order to achieve statutory targets.

It is also important to recognise the drivers of fuel poverty (in particular fuel prices), are not currently all within the Scottish Government's control.

- 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?**

See response to Qu 10, above.

- 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?**

See response to Qu 10, above.

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

We feel it is essential that there is sufficient representation from rural and island communities, in order to ensure sufficient information is provided to be able to monitor and report the impacts on these communities and their interests are properly reflected and considered.

This would ensure that island communities have confidence in the proposed strategy.

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

The Advisory Panel should include in its list of priorities the requirements:

- Listening to and working with local delivery organisations across Scotland, in order to fully understand the issues, and ensure their advice to the Government is informed in a way that will make the most of the Government's resources.
- To refine the fuel poverty definition. In particular, to take up the recommendations from the academic panel to use the Remote and Rural Scotland MIS, and to undertake additional work on vulnerability with specialists from public health, local health and social care
- To ensure that a comprehensive and workable system is developed and put in place to, henceforth, measure the affordable warmth *outcomes* of the new fuel poverty strategy and move away from assumptions that energy efficiency inputs necessarily equate to verifiable affordable warmth outcomes.

**15) What examples do you have of using proxies to identify fuel poor households?**

**a) Which proxies did you use?**

Due to the strong links between those households that are in fuel poverty and low income households, at a local level, use of the Council's Council Tax Reduction Scheme and Housing Benefit, can be used as a proxy.

The Energy Advice Service, run by CAB, delivers to ESF categories of: low income, workless household, lone parent and homeless / threatened with homelessness.

The use of Council Tax Banding for the HEEPSABS Scheme limits the households who can access support; it is a poor proxy of need, with limited evidence to support it.



**b) Based on your experience, how well did these proxies work in accurately identifying fuel poor households?**

N/A

- 16) What are the key lessons to be learnt from any existing approaches that apply proxies in door-to-door, on-the-ground assessments in this context?**

Due to the complexity of issues and solutions around Fuel Poverty, the value of proxies is lost. Tackling fuel poverty requires an individual household approach and multi-faceted solutions, as delivered through our local services in Shetland.

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

Area based schemes are not particularly relevant in an island context- house types vary substantially in remote rural areas. An individual household approach has to be taken.

- 18) How can the Scottish Government most effectively work with Community Planning Partnerships in a collaborative manner to report on overall fuel poverty levels as part of the SHCS?**

Those local CPPs for whom reducing fuel poverty is a priority, will have outcomes and targets of relevance in their LOIP. Relevant achievements across the CPP will be reported to local communities on a regular basis.

- 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?**

We welcome the introduction and development of an outcome based system of measuring, monitoring and improving Scotland's fuel poverty strategy, policies and programmes. At present, policies and programmes are almost entirely based on *input-based assumptions* most of which are energy efficiency inputs which, it is now widely recognised, do not necessarily then equate to *affordable warmth outcomes* for the households concerned. For example, many households do not heat their homes to a satisfactory level, to reduce costs.

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

The principles are worthy; we would welcome improved dialogue and understanding of our local issues and solutions.

- 21) In your opinion, would the proposed framework help to strengthen partnerships on-the-ground?**

This would very much depend on the approach to developing the framework, and the framework, itself. It would be important to involve local partners in its development.

- 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 proposed definition has the potential to increase socio-economic inequalities in Shetland, if it is used for funding and programmes. This will be more keenly felt by our low-income families and households in our more remote areas.

We are concerned about the implications for households where at least one person is long-term sick or disabled.

We note the absence of a reference to an islands impact assessment in this section of the consultation document. We ask the Government to clarify when this will be undertaken, and also to confirm local partners will be involved in this process.

- 23) What implications (including potential costs) will there be for business and public sector delivery organisations from these proposals?**

Our businesses and public sector delivery organisations experience higher fuel costs. If a sustainable funding source for energy reduction and efficiency measures is in place, it could provide the certainty required for private firms in Shetland to set up in this area, and thrive.

- 24) Do you think any of these proposals will have an impact, positive or negative, on children's rights? If so, what impact do you think that will be and, if negative, how do you think these could be mitigated?**

Any initiative to target resources towards fuel poor households with children is welcomed.

However, our calculations show that the proposed definition is in danger of diverting resources away from households with children. In order to improve the life circumstances of our children and young people, it is essential that they are able to grow up, and thrive, in warm homes.