



## **UNISON Scotland consultation response. Scottish Government Fuel Poverty Strategy**

### **Introduction**

UNISON Scotland is the largest trade union representing members across the devolved public sector. We represent staff in local authorities who have specific responsibilities in relation to fuel poverty, staff in the energy companies and workers in health and social care who deal with the consequences of fuel poverty.

We welcome the decision to adopt a new strategy after the statutory target to eliminate fuel poverty was not achieved. Overall, we believe the proposed strategy has some ambition, but is more focussed on process than measureable action. We would prefer to see earlier targets, programmes and in particular, investment.

The Scottish Government cut funding to £45m in 2007/08; largely because they thought the problem had been resolved. It has now recovered to £129m, although this is well below the £200m Energy Action Scotland warned was needed to meet the 2016 target.

### **Fuel poverty definition**

UNISON Scotland believes any calculation should be after housing costs. Reporting on before housing costs can falsely inflate a household's income, particularly if they receive housing benefit. Resources they cannot use for any other purpose is not disposable income and therefore cannot be counted as such.

We are not opposed to the use of MIS and have supported it in the living wage calculation and elsewhere. However, it can be a broad-brush measurement and a weighting needs to be applied to reflect the challenges facing off-grid households, in remote and largely rural areas. As these challenges have been recognised by the Scottish Government, we would expect the government to be responsive to the inadequacies of a UK MIS in this strategy.

There are challenges in collecting the detailed household information required to support policy development and programmes. Proxies such as benefit levels and the house EPC should still be used in the absence of detailed data.

### **75 age threshold**

Our members in health and social care agree that the age of 75 is when most people become vulnerable to a range of conditions. However, in Scotland's most disadvantaged communities many people do not live to this age and those that do will often suffer from multiple long-term health conditions. As we have argued with the UK government over the state pension age, this type of broad brush approach impacts most on those most in need of support.

## **Island and rural communities**

There are particular challenges facing island and rural areas that are not well reflected in the consultation. We highlight some of those above. These areas also rely on smaller trusted local contractors who may not always have the required level of certification.

## **Partnerships**

All delivery partners should be required to demonstrate that they meet Scottish Government procurement standards in relation to Fair Work, including the Scottish Living Wage.

We also need to ensure that data collection is sensitive to local factors and supports the work of Integrated Joint Boards in tackling the health and social care implications of fuel poverty. It is important that IJB's are not in any way separated from local authorities, who with their range of related responsibilities, provide the best opportunity to develop a whole system approach.

Multi-year funding has been a long-term request from delivery partners and would ensure continuity of provision and retention of staff expertise. The Scottish Government should also support the training of advice/support workers to a recognised standard.

## **One stop shop approach**

HES, as a national agency, cannot reach into every community and needs to pay close attention to local voices who work with people living in fuel poverty. Process measurements rarely capture actual needs. Telephone based approaches also have serious limitations at a time when people generally, and elderly people in particular, are becoming more aware of telephone fraud.

The strategy therefore needs to identify how it will target the hard to reach groups.

## **Statutory targets**

We strongly support a new statutory target to eliminate fuel poverty.

The proposed sub-targets, levels and timeframes demonstrate a lack of urgency to tackle fuel poverty. It suggests a near business as usual approach which will condemn a further generation to poor health, unaffordable housing and high energy costs. Scottish Government modelling indicates that adoption of the new definition would reduce fuel poverty levels by approximately 5%. This would bring current fuel poverty levels to less than 22%.

We understand that fuel poverty cannot be eliminated overnight, but 2040 is just too far away to be meaningful and way beyond the political cycle. It will allow this and future governments to take their foot off the pedal, pushing progress and action further down the road.

For this reason, the interim milestones should be brought forward to 2025, with an end date of 2030.

We support the role of an Advisory Panel, which should also be tasked with providing an independent report to ministers and parliament on progress with the strategy.

## **Conclusion**

A new fuel poverty strategy is an important and welcome development. However, the proposals in the consultation need to be more ambitious and supported by investment. It also needs to engage local partners more effectively in a whole system approach.

**UNISON Scotland**  
**February 2018**

### **For further Information contact:**

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