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Fuel Poverty Strategy Stakeholder Engagement Report

December 2024

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1. Introduction

This report provides an overview of the Department for Communities' (DfC) stakeholder engagement process in developing a new Fuel Poverty Strategy. It includes a collated summary of discussions with stakeholders across a series of workshops and focus groups held between April and July 2024. This includes some of the stakeholder feedback on how the Department could improve its new fuel poverty scheme, which will be launched in April 2026.

It also summarises the engagement with government colleagues and those working in relevant Arms' Length Bodies and other organisations with a responsibility for or interest in issues relating to fuel poverty.

This report is being shared to support the public consultation process. It demonstrates how the strategy has been informed by our engagement process and our commitment to continue to work alongside stakeholders to shape proposals.

2. Approach

Stakeholder involvement has been key to ensure that a new Fuel Poverty Strategy:

- reflects the Northern Ireland context
- is based on people's own experience of fuel poverty and energy hardship
- develops the right solutions and support for those who need it most
- makes use of other people's expertise and experience
- builds on and reflects related policy work elsewhere

Cross-government policy workshop

In January 2023 an internal workshop was organised to bring together key policy teams from across government and other public sector bodies. This was an opportunity to set out initial design assumptions, build relationships with relevant teams, develop a picture of emerging policy and explore key priorities and gaps that a future fuel poverty strategy could focus on.

Project Board

A Project Board was formed in September 2023 consisting of senior officials from relevant Departments as well as the Northern Ireland Housing Executive (NIHE), Consumer Council NI (CCNI) and NI Authority for

Utility Regulation (NIAUR) (See Appendix A for membership). The Board provides high-level oversight and critically evaluates and provides strategic direction for the preparation, development and management of a new Fuel Poverty Strategy for NI. They will continue to support the transition from development to implementation of the strategy.

Reference Panel

A reference panel was also established in September 2023 to provide external expertise and insight (see Appendix B for membership). Members came from the community and voluntary sector, academia and arms' length bodies. The Panel provides advice, feedback and support as well as a reference and challenge function. Key issues were brought to the Panel to enable discussion of these in greater depth and hear thoughts on how to approach these in the strategy development process.

Webinar

A webinar was held in May 2024 to learn from other countries' experiences dealing with fuel poverty and to hear how they have used a 'basket of indicators' approach to gathering a more complete picture of the fuel poverty landscape.

Bilateral/other

Throughout this process we have also met bilaterally with government, community and voluntary sector, academic, practitioner and other public sector organisations to build relationships, raise awareness of the strategy development and learn from experiences elsewhere.

Intensive stakeholder engagement

From April-June 2024, the Fuel Poverty Strategy project team and the Home Energy policy team hosted a series of stakeholder engagement workshops and focus groups across Northern Ireland. The aim was to gather opinions and real-life experiences to support the development of a new Fuel Poverty Strategy and explore initial priorities for a new Fuel Poverty Energy Efficiency Scheme. In total, more than 365 participants registered to attend the workshops or participated in the focus groups.

Workshops

We organised 9 workshops in total focusing on 3 key sets of topics. Each series of workshops had one online event for those unable to attend in person. Workshop topics were:

- Eligibility
- Collaboration and Partnership
- Understanding and Framing.

These events considered long and short-term support for those most in need, informed stakeholders about key issues and listened to lived experiences. Discussions were open and consideration given to the complex and wide-reaching issues faced by those in fuel poverty. There was a focus on how to work well across different sectors and government to achieve shared aims and make best use of our limited resources to help those most in need.

Participants came from the community and voluntary sector, energy companies, other government departments, housing associations, charitable organisations and energy industry professionals. A final online feedback event provided participants with an overview of what we had heard, in line with our ‘feedback and feed forward’ approach.

The workshop slides are available online at [Fuel Poverty Workshop overviews | Department for Communities \(communities-ni.gov.uk\)](#)

Focus groups

We held a series of focus groups to hear from vulnerable people and those who are most impacted by fuel poverty (See Appendix C for the dates and locations). In some circumstances it was challenging to speak with people directly and in these cases, we spoke to a number of representatives who support or work with these populations.

The discussions helped us to capture the real life experiences of vulnerable people, giving them a voice and including them in the process to help with strategy development. The groups provided real insight into the daily struggles of how fuel poverty impacts them and the choices people make in their homes. In addition, two focus groups were held with representatives from heating, insulation, renewable energy sectors, NIHE, Utility Regulator and colleagues from Department for Economy to discuss the energy

efficiency measures to be considered in the development of the new scheme. Discussion also centred on grant limits and a code of practice/quality standard for those working on the new scheme.

This report contains collated summaries of the discussions at the workshops and focus groups. It reflects discussions heard and does not reflect the views of the Department.

3. Framing and understanding fuel poverty

Stakeholders discussed a Vision and set of Principles for a new Fuel Poverty Strategy as well as addressing how we define fuel poverty and some of the challenges and opportunities for improving our understanding of both fuel poverty and its impacts.

VISION

The following proposed vision was tested:

Everyone lives in a warm, healthy home.

Generally, feedback was positive and some said that it states what we want to achieve in a simple and easy to understand manner. The word ‘health’ was welcomed. Alternative suggestions were to include ‘sustainable’ so that the vision would be linked to climate targets, with further suggestions to include energy efficient and affordable. Words such as accessible, inclusive and trust were also suggested, as well as affordability and urgency, recognising that people need immediate help.



Principles

The following proposed principles were discussed:

1. Long-Term Sustainable Solutions
2. Needs-Based
3. Person Centred
4. Collaboration

These principles generally received support, with discussions around how some of them might be applied. It was agreed that the principles should align with and underpin the vision. Stakeholders noted that it was important that the principles should be agreed and accepted by all government departments. Feedback included:

- **Long-Term Sustainable Solutions** – This should perhaps include innovation. Furthermore, all actions in the Strategy should be multiyear with a long-term focus.
- **Needs-Based** – When designing new interventions and taking forward the strategy we should consider both the home and the person who lives in it. Objective need is important but there are different types of need and vulnerability, not all of which may apply to the same people.
- **Person Centred** - often the most in need are vulnerable and they cannot advocate for themselves. We heard suggestions that support should be holistic. To be fully person centred we should be careful

around the use of language to remove the stigma that can be associated with poverty or fuel poverty. Also, we should recognise the behavioural change needed to reach net zero.

- **Collaboration** – If real collaboration is to be achieved a model must be in place. Stakeholders highlighted the importance of using existing relationships and not necessarily creating new structures. It was noted that there are many people and organisations that we can connect with to improve how we design and deliver policy.

Further suggestions included:

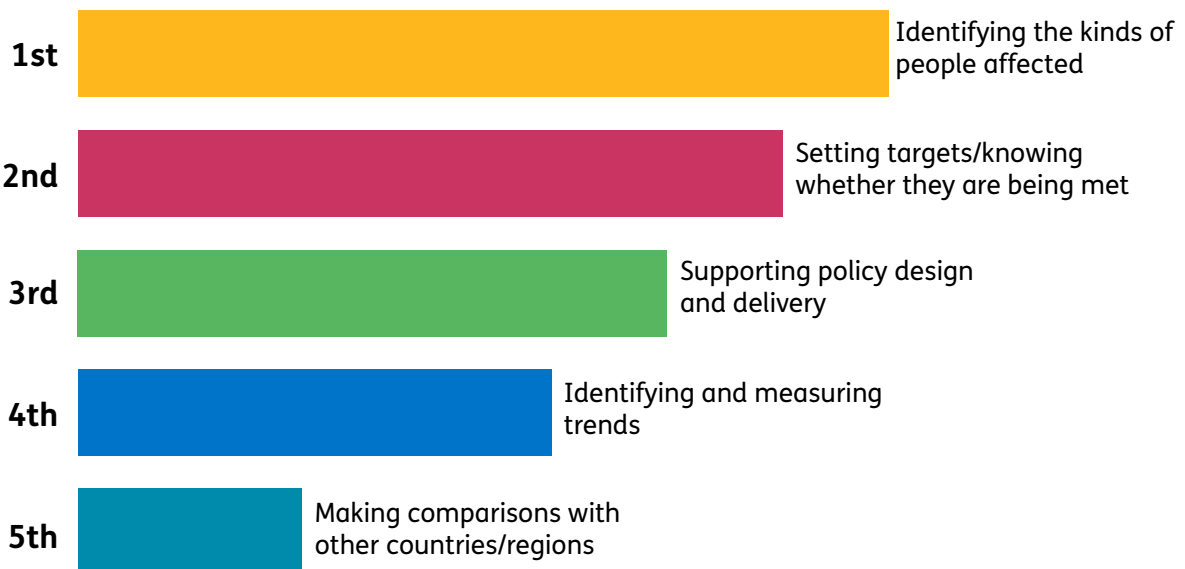
- **Transparency and trust** – there were concerns that people do not always know the support available, who is eligible, and why decisions are taken in certain ways. Building trust was considered important to improve awareness and confidence in what government wants to achieve
- **Empowerment** – we heard about the need to recognise structural barriers to participation. Some groups, such as private renters, can struggle to participate in energy efficiency measures and have little agency. Empowering people and communities also means increased awareness raising, advice and education.

Understanding fuel poverty

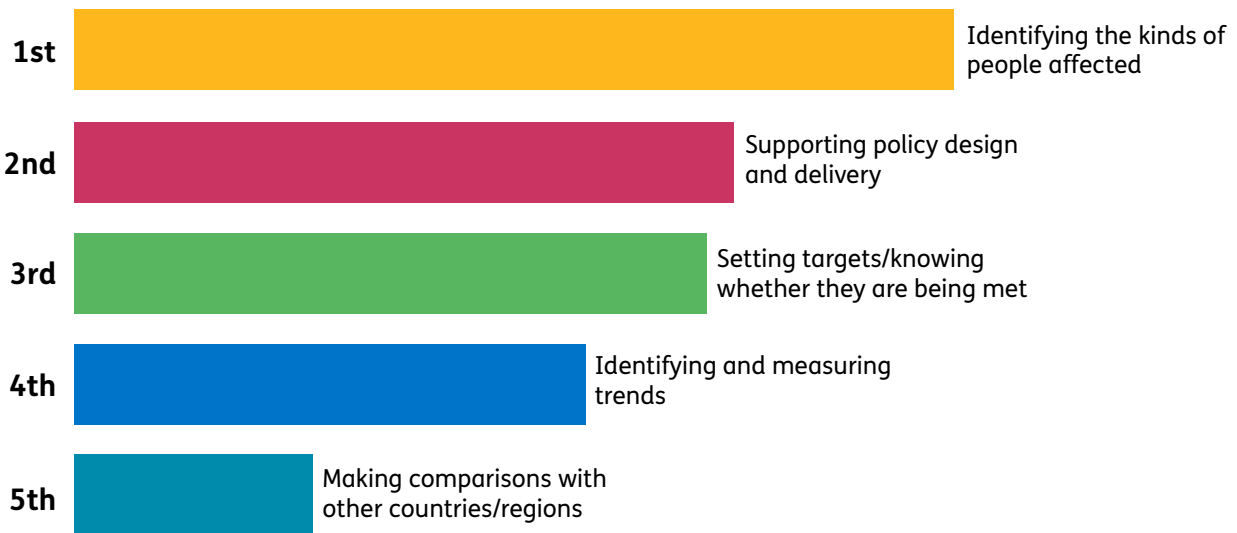
We discussed the definition of fuel poverty, the data we use to measure it and potential indicators in the future. These issues were informed by a webinar held with energy experts from New Zealand and the Netherlands to understand how other countries understand and measure fuel poverty. They used multiple mechanisms and data sources to build a picture of fuel poverty (also called energy hardship and energy poverty).

What is the most important aspect of a definition?

Results from workshop 3 – Understanding and Framing – held in NICVA Belfast



Results from workshop 3 – Understanding and Framing – Online session



Most groups agreed that identifying the kinds of people affected by fuel poverty was the most important aspect of a definition. This helps policy development and with targeting help to those who need it most. Linked to this, groups wanted to see a greater emphasis on the impacts of fuel poverty. It was considered important to link policy development with fuel poverty trends and understand the severity of fuel poverty.

There was disagreement on using a definition to set targets. Some wanted clear, timebound, measurable targets whereas others argued that target-setting can have adverse or unintended consequences. Making comparisons with other regions was considered less important because other regions are already changing their definition and there are different contexts across the

UK. There was more interest in regional comparisons within Northern Ireland and between rural and urban areas.

Concepts of a definition - People acknowledged that our definition is imperfect but there was wariness about ‘changing the goal posts’. Some felt the 10% definition was no longer relevant but others thought that other definitions weren’t necessarily better. It was suggested that people over the 10% threshold will also need support to achieve a warm healthy home. Some wanted to use multiple definitions but others disagreed.

‘Using a tandem approach can become confusing as there may be too many caveats’.

We also heard a number of times that using language like ‘fuel poverty’ or ‘poverty’ does not provide dignity and can put people off applying for help. Some said that government should be careful not to stigmatise people by using the wrong language.

Income and savings - Some didn’t think the definition sufficiently considers living and housing costs. An ‘after housing costs’ measure or disposable income was suggested. Some said that savings should be taken into account. The **Rural Focus group** and **Women’s group** both said high childcare costs can affect people’s ability to heat their homes and the **rural focus group** emphasised high transport costs in rural areas.

Different population needs - Groups discussed the importance of capturing the needs of different people, for example whether older or disabled people need a warmer home to be healthy and comfortable. Some suggested other vulnerabilities such as end of life or the working poor. There were different opinions on whether a specific temperature regime or a flexible approach would be best, with an argument that we should focus on people’s perceptions rather than making assumptions.

Carers said it is hard for them and disabled people to have a good quality of life if they are cold. **The terminal illness support group** noted the high running costs of vital life-saving equipment. We heard that people are switching off medical equipment due to the costs of keeping it running and that:

‘People have been left in hoists overnight and deaf smoke alarms can switch off’

Travellers live in a wide variety of housing such as caravans, mobile homes, social and private rented housing and mould is a big issue in all of them. Bottled gas or electric heaters at sites can be expensive to run. **Migrant communities** may have higher heating needs if they come from warmer climates and can’t afford to go out.

Health - Stakeholders said that living in cold homes affects people’s health and this has a knock-on effect on the health service. This includes hospitals being unable to discharge patients to a cold home, which reduces available bed space. It was noted that DfC and DoH priorities are often closely aligned but the link up isn’t always there.

‘Houses aren’t habitable without heat’

Data - Participants focused on the need for up to date, relevant data that drives change. There were many calls for collecting more data and using data from trusted partners rather than relying on a 5-year survey to be responsive to changing need.

How would we know if someone wasn't able to heat or power their homes adequately?

This discussion focused on alternative ways of understanding fuel poverty, based on experiences of stakeholders. There were suggestions on qualitative and quantitative indicators to help understand fuel poverty and its impacts.

Responses to the question 'How would we know if someone wasn't able to heat or power their homes adequately?'



Health - Many stakeholders referred to the presence of damp, mould, condensation, or a fusty smell. They noted that health will deteriorate if the house is too cold or damp, particularly respiratory illness, asthma and excess winter deaths. A&E admissions for respiratory illness or asthma could be sources of data. The **women's disability focus group** mentioned a rise in the number of disabled people going to foodbanks.

'It gets you down and affects your mental health living in a cold home'

Living conditions - Stakeholders said that house visits provide clear indicators of fuel poverty: a cold or dark home, radiators turned off, lights off and people staying in the bedroom or in bed. People focus on heating themselves with blankets on the sofa or wearing coats indoors. Stakeholders noted reduced capacity of organisations to carry out home visits making it harder to pick up on these signs.

Seeking help - Stakeholders told us that a clear indicator for fuel poverty is when people go to warm places such as libraries or ask for help from charities, though there is a stigma in asking for help. Many ask family or friends for support but this is harder to capture. When people's health is affected by cold and damp it can also diminish their ability to seek help or take care of themselves and others. One health professional noted migrant children in

care increasing as parents believe that their children are better off in a home with adequate food and heat. The **Foyle Foodbank group** said people seek help when they are at rock bottom but this can be too late.

Debt and energy bills - People get into debt by borrowing money to pay for their utilities. They cannot pay their bills on time or self-disconnect. It was noted that the general cost of living caused an increase in expensive debt.

Social and behavioural aspects - Fuel poverty can cause social isolation, for example, children not bringing friends home and an increase in loneliness. Other signs were looking dishevelled or unkempt, or clothes with a damp smell. If people are not heating their home, they are also unlikely to be eating properly, and women particularly make decisions about whether to heat or eat. This was highlighted in all focus groups with the **disability focus groups** using heated throws, switching off the gas completely and sometimes choose between heating and eating.

Children and education - Fuel poverty can impact children through lower educational attainment, poor concentration, a decline in school attendance if uniforms can't be washed, children doing homework in busy rooms and teenagers working to support families. Restricted finances can cause stress, impact safeguarding and reduce

children's participation in activities. The **Women's Group** said that young children need warm homes but they sometimes make their families wear layers instead.

‘When the house gets cold, we take the children to bed to watch TV’

Who would have this information or data?

People affected - A frequent suggestion about where to find information on fuel poverty was from those experiencing it. There were suggestions to ask people directly: ‘are you worried about heating your home?’.

Energy-related data - Energy suppliers may have data on who is vulnerable, on a payment plan, or making smaller top-up payments. Data on oil is hard to access but it was suggested that oil companies could help with referrals if they see people getting frequent small deliveries.

Health sector - Northern Ireland Statistics and Research Agency (NISRA) has statistics on health conditions linked to damp and mould such as chronic respiratory illnesses and excess winter deaths. A&E admissions, Public Health Agency (PHA) and clinics may have data on poor health exacerbated by cold homes. Treasury may have data on savings to the public purse from reducing fuel poverty.

Benefits system - This could provide data on the number of discretionary payments and if these are related to universal credit figures.

Community and voluntary sector (VCS) - Specific organisations were noted such as Saint Vincent DePaul (SVP), Advice NI, Trussell Trust as well as general recommendations such as charities, social services and food banks. Other data sources suggested were other departments, teachers, Councils, NIHE, Housing Associations and universities.

What data would you collect to measure the success of Fuel Poverty interventions?

Workshop attendees discussed what data would help capture the success of new interventions. They also made suggestions about how data should be collected, for example baseline data, post-intervention data, and potentially further data after the scheme has been up and running for a year. It was suggested that all government schemes should measure outcomes in the same way and these should be holistic.

Energy data - Some attendees suggested that smart meters would enable data on self-disconnection and low energy users. A number of people suggested that a key indicator was energy usage e.g. pre and post-installation impact on the energy consumption of the property or the Energy

Performance Certificate (EPC). Others suggested that data on financial savings should also be captured. It is harder to capture data on oil usage.

Health data - Stakeholder suggested that data on damp or mould in homes should be collected as part of any fuel poverty intervention. They suggested that social housing has data on damp and mould and landlords know if there is damp but they will not take any action or help. One idea would be to check if there has been a change in

the number of cases sent to environmental health in councils.

Carbon – It was recommended that intervention should capture carbon reductions. It was noted that people considered to be in fuel poverty are not the biggest carbon offenders as they are more likely to have smaller houses, use public transport or have one car.

4. Making homes more efficient

The workshops highlighted the importance of increasing investment in energy efficiency. There were discussions about how government should determine eligibility for support in a coordinated way and consideration of how a new Affordable Warmth Scheme could be designed to support those who need it most. Stakeholders said that much more investment was needed and some suggested DoH funding as well as recommending long-term budgets.

‘You can give people fuel vouchers but the energy efficiency in the home [...] being rated so low it’s like leaving the front and back door open.’

Housing Standards

In every workshop the problem of poor quality housing was raised repeatedly. Most discussions related to the poor standards experienced in the private rented sector, although there were references to low housing standards in some social housing homes. Stakeholders noted that many vulnerable groups live in this sector and they are harder to reach, likely to be on low-incomes and have children.

Migrant communities fear that raising issues will lead to rent increases or losing their home and for this group there can be additional cultural or language barriers.

‘There is a feeling that anything will do for this group of people.’

Even the less vulnerable feel at risk: the demand for housing is so high that any tenant who requests improvements or repairs fears eviction or rent increases.

Many suggested that the PRS sector needs new standards, perhaps in legislation. Some suggested energy-related standards, such as Minimum Energy Efficiency Standards (MEES), EPCs or Standard Assessment Procedure(SAP) ratings. **Men and women’s disability groups** noted low standards in private rented accommodation. The **women’s group** said that landlords don’t want to help.

Others said that the fitness standards were far too low and enabled landlords to continue to rent out very poor quality housing. Overall there was a strong sense that regulation is needed to improve housing standards in the private rented sector and people regularly referred to

the need for a 'stick' in order to drive this change. The **Rural focus group** mentioned a case where the Environmental Health officer complained about a smell of damp but the house still passed fitness standards:

'How is this possible?'

Some believed that having an incentive such as financial support, a free EPC audit or rates reductions if energy ratings were met could raise standards. Stakeholders noted the importance of on-going protection, highlighting landlords can improve their properties with grants and then raise rents. Clawback mechanisms were suggested for those who benefit from improvements and then sell the property.

It was noted that there is government funding for new build social housing but not for retrofit which will need to be financed via rents. This could impact low-income homes. It was suggested that while there is generally higher energy efficiency in social housing, a targeted scheme for the least energy efficient homes is still required.

There is a unique challenge for the **traveller community** as a number live in caravans or mobile homes. These homes are usually of much poorer quality and are not subject to the same standards that apply to permanent homes.

Enforcement - It was noted that councils are not enforcing environmental health laws. Many wanted a focus on compelling landlords to take action to improve standards. Some tenants are aware of their rights but struggle to enforce change. Damp and mould are not being treated by landlords and stakeholders said they need to be held to account. The issue of vulnerability and a tenant/landlord power imbalance was raised multiple times. It was also noted that the landlord register is not up to date and there is no oversight of the Act or register.

'If private renters cannot participate, why should they be excluded when landlords are not held to account over poor standards?'

Replacement for Affordable Warmth Scheme

As DfC is in the early stages of developing a new fuel poverty intervention to replace the Affordable Warmth Scheme, it also gathered feedback on some operational aspects of this scheme. The current Scheme ends in March 2026, and a new scheme must support the principles of the new Fuel Poverty Strategy, align with the Energy and Green Growth Strategies and contribute to responsibilities under the Climate Change Act. Given the ongoing cost of living crisis, there is a need to review eligibility criteria, income thresholds and application mechanisms to ensure that the

most vulnerable and those experiencing fuel poverty can access the scheme.

Eligibility

Stakeholders ranked five potential eligibility criteria (income threshold, energy rating of a house, having certain health conditions, qualifying for certain benefits and age of applicant). Before the roundtable, groups placed most importance on using an income threshold to determine eligibility, followed by the home energy rating, having a certain health condition, being entitled to certain benefits, with age ranked as least important. Following the discussion income thresholds and home energy rating were rated as being of equal top importance with other rankings remaining the same.

It was noted that many with the lowest income are on benefits. However, using income threshold only as a criterion could mean a lack of flexibility. For example, a disabled person who requires lifesaving equipment has higher energy bills than a household without these needs. It was felt that the ‘working poor’ are often overlooked yet their disposable income can be less than those in receipt of benefits. It was also highlighted that older people often have low or no housing costs. Some noted the importance of household makeup i.e. a couple with or without dependents or a single person.

The consensus was that whilst certain health conditions were exacerbated by living in cold and damp conditions, not everyone with a health condition is fuel poor.

Energy rating of the home - This was considered most important by some. Using energy rating as a criterion would help those in the private rented sector and stakeholders said that improving efficiency of homes would not only help the current occupier but all future generations.

‘If it is not fixed then the energy spending will always be high’

This led to discussion on the potential use of a home energy efficiency audit and considering the age of a property among the criteria. Another argument for prioritising the home was:

‘Personal circumstances also change quickly – homes do not’.

Income - Stakeholders were asked to select the income band that they felt was most appropriate. It was felt that the current income threshold of £23k was low and stakeholders preferred the highest income threshold:

- £25-30k – 12.3%
- £30-35k – 27.7%

- £35-40k – 24.6%
- £40-45k – 35.4%

It was noted that if the budget for the new scheme is small, allowing higher income households to apply could mean that the most vulnerable do not get the help that they need. Many suggested that perhaps income could be on a sliding scale e.g. qualifying for an 80% grant with 20% loan.

The group felt that it should be net rather than gross income but acknowledged that this may be difficult to manage. Another suggestion was income after housing costs. Some felt that income should be backed with documentation and that savings should be considered. However some concerns were raised regarding the origin of savings, for example compensation claims due to injury. Stakeholders also asked:

‘Will the income threshold be raised each year in line with increases to, say, minimum wage levels?’

Benefits - 77.6% of stakeholders felt that recipients of all benefits should be eligible, 19% suggested only those on means-tested benefits and 3.4% felt that recipients of passport benefits should be included. If all benefits are included as eligibility criteria it was suggested the level of grant should be on a sliding scale as there are people in

receipt of disability benefits for example who are also high earners or have savings.

It was felt that if we were to consider disability benefits as eligibility criteria, that only those awarded for health conditions exacerbated by cold and damp conditions should be included. However, not all disabilities or conditions mean automatic entitlement to a disability benefit such as Personal Independence Payment e.g. asthma.

It was acknowledged that if means tested benefits were used to determine eligibility it would reduce the administration time and costs to process the scheme.

Other issues

- Can different models be used to help pay for making a home more efficient such as an interest free or low interest loan from the government as used in other countries?
- Can repayments be made straight from your salary as in childcare scheme?
- NI is the only jurisdiction that does not have a heat-pump or solar panel grants. The savings made from these measures could be reinvested back into the economy as disposable income is freed up.
- Broken boilers are a priority over insulation and financial assistance could be offered

for this short-term emergency need. Could a new scheme offer follow up services, annual servicing of boilers to maintain efficiency?

- There should be a multiyear budget for schemes and for voluntary and community sector funding to build up experience for the best outcomes.
- If administering ‘green loans’, safeguards need to be put in place for repayment – no high/increasing interest rates.
- The Affordable Warmth vulnerability matrix did help understanding who is most in need.

The Home Energy Branch held two focus groups in September 2024 with representatives from the heating, insulation & renewable energy sectors, NIHE, Utility Regulator and colleagues from Department for Economy (DfE) to discuss energy efficiency measures to be considered in the development of the new Fuel Poverty Energy Efficiency Scheme.

Energy Efficiency Measures

Over the two sessions the groups felt that we should be optimistic with our planning but that ultimately budget will dictate the scale of the scheme and measures offered. There was strong agreement that a ‘whole house, fabric first approach’ is required to maximise efficiency of action and that there is a need to ‘future proof’ current housing

stock. Each house should be assessed on a case-by-case basis, with an almost ‘bespoke’ solution offered and that all recommended measures must be accepted by the householder in order to proceed with the application.

With regards to ‘distress retrofits’ or emergency cases where a heating system breaks and is in urgent need of replacement, it was felt that these should be processed outside the remit of the new scheme. The groups also felt that low carbon heating solutions should be included within the scheme where appropriate to assist with meeting statutory Climate Change obligations. However, it was recognised that technologies are still evolving and that the scheme would need to reflect this through a transition period and emphasised the importance of progression towards low carbon heat away from the current heavy reliance on fossil fuels. The groups also felt that in those properties where a low carbon heating solution was installed, consideration should be given to the installation of PV (solar) panels with battery storage to maximise cost savings for the householder. The groups recognised the value of smart meters/monitoring to demonstrate savings in terms of energy efficiency, cost savings for the householder and return on investment for the Department. The addition of an Energy Performance Certificate (EPC) assessment pre and post installation was considered essential to report on energy efficiency gains.

Grant limits

The groups felt that the current Affordable Warmth Scheme grant limit of £7,500 (£10,000 for solid wall insulation) was too low given the current costs of the measures offered. They agreed that the grant limits for the new scheme should be reviewed periodically throughout the lifetime of the scheme and amended to reflect both cost of living and material increases. The groups agreed that the new scheme should offer a full quality retrofit (circa £28k-£33k per house) even if this meant that fewer households could be assisted overall.

Code of Practice

The groups were also asked to consider the use of a code of practice or mandating an established quality standard for the new scheme. Discussions centred around the use of existing governing standards bodies and the group agreed that only accredited contractors should be used to ensure a consistent level of standards, this also would provide reassurance for often vulnerable customers. Post work quality inspections were also discussed with the groups feeling that this should be an essential element of any scheme, this would build trust and maintain high standards of work. The groups discussed accountability and the need to have a clear simple redress process if things go wrong. They also suggested the addition of third party pre and post installation inspections to assess the requirements of each house and the quality of works conducted.

Coordinating our approach across government

Stakeholders wanted schemes to be coordinated strategically to ensure help is provided to those who need it most. Some stakeholders suggested that all schemes should take into account fuel poverty principles. Many said that higher fuel poverty levels should mean more funding is available to address it. Some common principles or approaches to future schemes emerged. Others suggested a joint DfE, Department of Health (DoH) and DfC funding pot to help people to avoid duplication and make administration easier.

Consistency – There were calls for multiyear budgets to provide consistency and confidence, enable planning and investment by industry and ensure that schemes remain open year-round:

‘Don’t stop and start schemes’

Flexibility - Stakeholders said schemes need to be flexible and need to have built-in protections for future proofing. It was noted that the people who need help will change over time and that government should ensure sufficient flexibility to avoid excluding certain groups. On the other hand, if criteria change too often it’s hard to keep track.

Accessibility and education - There are low levels of awareness of where to go for energy support. Many people suggested a one stop shop to enable help and advice on energy efficiency, grants and help with applications. Stakeholders told us that people need to be able to easily access information on schemes, customer care registers and other forms of support and requested much better awareness-raising and information campaigns:

‘It can be hard to know where to start, it is hard enough for people in the know to keep track of schemes.’

Stakeholders said that it was very hard to get good information on energy efficiency with no recognised government body to do this. Many in the **women’s disability group** who had medical equipment have not registered with the critical care or medical register with energy companies. The **Foyle foodbank group** had similar experiences:

‘Why are these things not advertised anywhere?’

Schemes need to be transparent, easy to apply for and understandable for all. More needs to be done to target people and bring them through the process. Inclusion is vital, including multiple forms of application such as telephone, digital and in person.

Handholding and support - Government should support home visits by social, voluntary and community sector or medical professionals to help determine who is eligible. There was strong support for a service that handholds through the process, recognising that the vulnerable will need extra help, empathy and understanding and may slip through the cracks.

Needs-based - The greatest discussion was how to ensure that support is needs based. Many stated that people with the greatest need should come first but this meant different things to different people: income, disabilities, health, the number and type of people in a home, energy efficiency or a combination were all suggested. We also heard that everyone should be eligible for some help otherwise the vision would not be achieved. This could range from advice, loans, partial grants or fully funded retrofits.

Some called this a tapered approach or sliding scale and it was suggested that this aligns with the proportionate universalism health inequalities model. This may allow a greater proportion of the population to benefit. On the other hand, some stakeholders suggested support should only be for those who cannot afford interventions. It was noted that broad eligibility could lead to long waiting lists which could erode trust.

Health - this was considered an important factor in determining eligibility for support because health conditions worsen in cold, damp homes.

‘If you have health conditions and on benefits then you are on a low income and being at home more means your energy bills are higher.’

Some priorities were suggested, for example carers of a disabled child, people with a life-limiting condition and those unable to leave the house due to a disability. It was noted that for these households, energy needs are higher and income lower due to caring responsibilities or a reduced inability to work. The **traveller community** has a high incidence of disability and respiratory illness, both exacerbated by cold and damp.

An alternative suggestion was to focus on people in deprived areas who currently are not seriously ill but might be more likely to be if their homes are cold.

Income and benefits – All agreed that lower income households should take priority for support and that the benefits system was not the best way of setting eligibility. Many stakeholders noted that working poor household incomes can be very low:

‘Just because they aren’t on benefits does not mean they do not need help’

Another argument against using benefits as a criteria is that not everyone who is eligible for benefits applies for them. There was agreement that certain benefits such as Disability Living Allowance, Personal Independence Payment, Attendance Allowance and Carers Allowance should not be counted as income.

Some said that debt was a growing problem and this need factored in. Others said that savings needed to be considered, but there was no agreement on whether they should exclude support or how we could assess savings.

The home - Some stakeholders said that schemes must consider both house condition and household income. Others said that government must either target the home or target the people. There was a suggestion to focus on areas that had fewer heating options, such as rural areas. We heard that to determine energy efficiency an energy advisor, energy audit or EPCs could be used. However, many recognised that EPCs are imperfect tools for assessing costs, carbon emissions or the effects of mould and damp. Others said that in the absence of anything better EPCs should be used.

Private Rented Sector - There was a strong focus on the needs of tenants, as the private rented sector is harder to reach, struggling more, has less influence over living conditions and likely to be low-income.

Age - Some people noted that age should be a factor but there was not agreement on whether this should relate to pension credit, retirement pension or something else.

How do we prioritise government support?

There was broad agreement that all schemes need clear prioritisation if they are over-subscribed. This would help with ensuring waiting lists did not grow too long. It was argued that government should align approaches to prioritising support.

Matrix - A matrix was suggested as a tool to help prioritise limited resources. Affordable Warmth and Northern Ireland Sustainable Energy Programme (NISEP) vulnerability matrices were suggested as a useful approach to help prioritise support. A points-based system was suggested e.g. children, disabilities/health, earnings, energy efficiency etc. Other suggestions were:

- higher scoring for somebody in an emergency
- scales to measure household characteristics
- worst first
- people-focused

Access to previous schemes - We heard that if a scheme provides a single intervention, then this could exclude the household from support from other aspects of the schemes in a subsequent year.

Data - Stakeholders felt that government should target support using good data and not just rely on the voluntary and community sector, though this sector can ensure that very few slip through the cracks. There were calls for departments to share data with each other. However, the **women's disability group** said that they would prefer not to be auto-enrolled on schemes for support as they have issues with data sharing.

Area-based - Another suggestion was to focus on local initiatives and there was reference to the PHA health improvement partnership model. Stakeholders said that rural areas have different needs and fewer low-carbon heating options so support should be prioritised here:

‘If they can’t change from oil to gas, how can they make efficiency savings?’

Others argued that location should not exclude people from support.

Partnership - We were told that trust needs to be built with communities. Local knowledge helps identify people who are in need but less likely to apply for support and this could mean signposting to a range of support, but people should only need to 'tell their story' once. There were recommendations for partnership with health agencies, local authorities, statutory bodies and community groups.

Types of grant - Some stakeholders urged schemes not to neglect low cost options such as window seals, draft excluders, lightbulbs as these can make a difference in energy costs. These measures could be wide reaching and stimulate industry.

5. Collaboration and Capacity-Building

Emergency support

It was recognised that there will always be a need for short term emergency support and this will most likely be in the form of financial assistance. Such support is not always joined up and it varies from location and the type of help offered. There were calls to ensure that there is flexibility, for example people can get top up credit vouchers for gas and electricity, but for people who pay a bill there is less support. For those using oil or coal there is limited help and it may depend on location.

‘For my birthday I asked for a fill of oil’

It was noted that there is little advertising for support and people have no awareness of it. People often rely on word of mouth.

Discretionary support - This helps people in the form of loans and grants in emergency situations. It was raised that the length of time it takes to get the payment is too long, especially when people are in an emergency. Another issue is that people need a guarantee in an emergency but

Discretionary Support does not offer this and waiting for a decision adds to stress.

It is felt that it is too bureaucratic at times and although Discretionary Support can help in emergency situations, recovering the loan from people on benefits can be an issue. An example was given in the **Foyle foodbank focus** group of someone receiving a loan to cover fuel costs. They were due to get paid by Universal Credit, but Discretionary Support recovered the loan amount in full and put them back into an emergency situation. It was suggested that a repayment period should be agreed as in Universal Credit.

One stop shop - The **men’s disability group** said that despite feeling that they would be eligible for help nobody has applied for any schemes. They didn’t know there was anything out there, didn’t know how to apply and didn’t think there was anyone to help them apply as these things aren’t advertised anywhere. Knowing where to look can be an issue and they need to know what can be trusted. The only way they receive information is through the group or from Disability Action. The **women’s group**

also highlighted a lack of awareness about available support

‘If you don’t know who to contact you are completely lost’

The **Foyle foodbank group** noted that when they have sought advice from the existing advice line service it was very basic information. The **rural focus group** gave an example of calling all 11 councils for information on the Affordable Warmth Scheme but they were unable to get in contact with anyone to speak about the scheme or get information on energy efficiency.

Boilers - It was raised that people often contact charities looking for help to get their boiler repaired. For people in social housing and the private rented sector this should be the landlords’ responsibility. For homeowners they have nowhere to turn to for help. It was suggested that the government should provide this support or help should be available through discretionary support no matter how many loans they may have.

Universal Credit Budgeting Advance - It was raised in the workshops that if someone is claiming Universal Credit, they can get a budgeting advance to help with an energy household cost. This can be paid on the same day and an agreed repayment period

and amount arranged with the option to defer repayments to allow additional time to repay if they are struggling financially. However if someone had applied for an advance previously for another emergency, they are not able to get a further advance until this is repaid.

The Voluntary and Community Sector - This Sector was regarded as where most people go for help in an emergency situation. These groups all take a different approach to helping people but the one thing that they all had in common was that they put the person first and foremost and offer flexibility where they can.

When emergency energy assistance is required top ups for gas or electricity can be provided to help with that specific need. For people using coal or oil there is little to no help, although some charities, such as Saint Vincent DePaul, can help with oil drums. However, transport of drums can be challenging. Community organisations can refer people to foodbanks that may also operate as a fuel bank but this depends on location. We heard that many foodbanks do not offer fuel support as the demand would be more than they could cope with.

It was said that there is often a lack of collaboration between government and these organisations. There is a feeling that the government is looking them to do more and more with less and less and they are

putting an extra burden on organisations without providing extra resources or funding.

Energy Suppliers - Energy suppliers can support people in an emergency situation but the help varies from supplier to supplier. It may include help to ensure the electricity is not switched off or support with debt repayments. Suppliers noted that they are willing to help and support but they need partners to work with them as they do not have the capacity to deal with all the issues that are presented to them. The **terminal illness focus group** said that some suppliers help people going through terminal illness with top up vouchers for their electricity. This is not widely advertised.

Community energy

Stakeholders noted opportunities for communities to become more active in energy. Oil buying clubs are the most common type of community energy in Northern Ireland but other examples were the Northern Ireland Community Energy (NICE) solar panel scheme on publicly owned buildings and GAA green club initiative.

Each community has different needs and community energy masterplans and workshops on home energy efficiency were suggested. Councils could support a community-based approach as some have energy efficiency advisors. There were calls

for a Northern Ireland community energy scheme and suggestions for community heating or heat networks with fixed costs spread over the year.

The **rural focus group** noted that community energy could provide sustainable energy solutions for rural areas. Some schemes already deliver energy efficiency and reduced energy bills. There were suggestions that when infrastructure for renewables is built there should be local discounts on electricity or community energy opportunities and there is a need to change the narrative in rural areas on renewables.

Community equity in wind farms, Community Private Partnership, the Drumlin Wind Farm Cooperative and a geothermal energy project in Tralee were examples of communities engaging in energy and building wealth or keeping costs down.

Targeting

Targeting was considered positive but only if done correctly. It was felt that people would prefer to be targeted than miss out on the opportunity for help and that people with vulnerabilities may not have the capacity or knowledge to seek help. There were concerns about targeting in the previous Affordable Warmth Scheme where people in similar circumstances were not eligible even though they lived only a few metres apart.

Targeting was recognised as a complex issue. For example, if a targeted intervention is delivered then what will happen to the people who sit just outside the scope of eligibility but are still struggling financially? How can people be targeted if there is no direct contact with them? It was raised that advertising is needed for available support or schemes through social media, schools, leaflet drops, community groups and people who are in contact with vulnerable people.

The Voluntary and Community Sector feel that they are well placed to reach out to those who need help and support. There were varied opinions on who to target, tying into income levels and the vulnerability matrix for the new fuel poverty scheme. Some suggested the working poor, others high energy users with vulnerabilities who could be pinpointed by energy suppliers if they are on the customer care register. There were calls for the benefit system to target people. They can easily contact households but it was noted that there is not a lot of trust there.

Holistic support

It was frequently raised that there is a need for holistic support when someone has requested support for energy. When someone has asked for help, this is a good time to find out the issues that led to them asking for support, for example the efficiency of the home, debt, benefit checks, energy tariff and budgeting etc. An

additional point raised was that if a person repeatedly requests emergency support, then follow ups should be done to offer support or a referral for any issues they are facing.

‘There should be no wrong door to access support.’

The **disability focus group** said they have to build themselves up to make a call for support. If they are put on hold and then do not get an answer or are passed off to another organisation then this is off putting. A more holistic approach would be to pass their details on to the relevant organisation and receive a call back.

It was recognised that not all organisations or people can deal with all these requests for additional support but greater collaboration with trusted partners would help. There is a feeling that when an application is made no further details are captured to find out why the request has been made. This is a lost opportunity to offer holistic support.

Advice and information on emergency energy and benefits

Stakeholders mentioned many places that people go to for support across local and central government, the VCS, arms' length bodies and others. They noted helplines such as Make the Call, organisations such as energy suppliers and foodbanks, Jobs

and Benefit offices and online sources such as the Consumer Council and NI Direct. Some felt that the majority of emergency support was in benefit advice through the government.

Improve energy awareness knowledge in VCS - When discussing energy awareness and efficiency with the VCS it was clear that there is a gap in knowledge and even informed people can struggle with staying up to date. Due to the funding of organisations and use of short-term contracts they lose experience and knowledge as people seek more job security and move on.

Health professionals, councils and people in the benefit system have limited energy knowledge but all have interactions with vulnerable people and there should be an avenue for all to source information, educate themselves and make referrals if they have the scope to do so. NIHE offers energy efficiency advice but many thought this was only available for NIHE tenants. People said that the system is hard to navigate, with long waiting times and you cannot make requests on behalf of vulnerable people.

Many suggested a greater online presence so people can easily access information on behavioural change and a one stop shop for all energy matters to enable trusted

partners to make referrals on behalf of vulnerable people. A one stop shop was requested in all workshops and focus groups as the best method of raising awareness, seeking support and delivering measures.

Increase data-sharing capabilities - It was suggested that improved data sharing within and across departments would improve the accuracy of support, reduce waiting and administration times and be used to target the right people. The **women's disability group** felt uncomfortable with data sharing, however.

If Discretionary Support or Universal Credit has received requests for emergency energy support this should be referred on, but some stakeholders felt a reluctance for government to do this due to GDPR. Many suggested that if successful data sharing pathways were set up, this would allow greater collaboration between departments and trusted partners and help develop referral pathways.

The **terminal illness focus group** said that data sharing would be a good idea for someone who has a terminal illness. If someone presents an SR1 (special rules identifier) to any government department then this could trigger additional referrals for support such as benefit and energy efficiency checks. This was seen positively but the issue of data sharing and consent

arose as the person themselves may not know they have a terminal illness and may not have given consent for data sharing.

It was also suggested that VCS, council and energy suppliers hold data that could benefit government in identifying trends in fuel poverty but again the issue of data-sharing arose. Saint Vincent DePaul and The Trussel Trust hold data on support given to people with oil but they feel this cannot be shared as they have confidentiality agreements with those who have sought help. One

suggestion is voluntary databases that use data to allow additional help and support and build a pool of data for analysis. The feeling was that the VCS are in a good place to get data as they are trusted.

There were many calls for government departments to seek clarity on what can be shared rather than taking a cautious approach.

6. Protecting Consumers

Stakeholders discussed protecting consumers from high energy costs and how education and awareness could help people manage their bills. In addition, there was discussion about unfair practices and how people could have a more protected experience of energy.

Understanding and mitigating changing costs of energy

Support to manage oil costs - It was noted that there is little help or support if you run out of oil or non-metered fuels. Not everyone has the capability to call around suppliers to find the cheapest provider though it was noted that the Consumer Council website has oil prices to help people find the best deals. Oil buying clubs run by NIHE enable lower prices but it is dependent on people placing orders and in rural areas does not always work. Another form of help is oil buying stamp schemes organised by local councils and we heard that some Credit Unions run interest free oil loans.

Those on lower incomes pay more for oil because buying smaller quantities costs more per litre. If there are minimum delivery quantities, low-income households are least likely to be able to afford oil when needed: a particular issue in rural areas.

Support to manage electricity and gas bills

- These are regulated but people do not have the capacity to switch suppliers due to different vulnerabilities. Newer customers often get the best deals which can leave someone who is unable to switch on a higher tariff. The **men's disability group** felt that they would forget to switch at the end of a contract.

Some suppliers offer a hardship fund for people who cannot afford to top up their electricity. This varies from supplier to supplier and it is not advertised to customers. It was suggested that a one stop shop could help vulnerable people switch providers to enable them to make savings. Some wanted loyalty deals for existing customers, especially vulnerable people who have limited capacity to switch. The Energy Cloud project is a potential tool to use excess wind energy to heat hot water. Others suggested offering solar panels to reduce bills.

Higher energy needs for vulnerable groups

- The **disability, carers and terminal illness** groups highlighted that vulnerable people have a high level of energy use due to health conditions, for example electric hoists, stair lifts, oxygen, dialysis, consistent lighting requirements (for people who are partially

sighted or suffer from dementia), and more washing and drying of clothes. These groups are at home a lot and need more heat to not exacerbate their conditions. The use of affordability tariffs was suggested as support for these vulnerable groups.

‘If someone has certain disabilities then there could be a discount scheme applied to them for oil, gas or electricity’

Types of support for those with additional needs - Energy suppliers can offer support for people who are terminally ill through an energy top up, but this is not advertised. Oxygen companies issue refunds for the use of oxygen and in Northern Ireland the NHS can refund money for the electricity needed for a dialysis machine. Some people suggested trialling free block units of energy for those who have a terminal illness along with their Personal Independence Payment claim. Great Britain has piloted warm home prescriptions and stakeholders suggested these be made available in Northern Ireland.

Other consumer protection issues

Non-regulated fuels - Some people use coal, anthracite or propane bottled fuel for heating. None of these are regulated and therefore their price can vary without any control. Lack of regulation also reduces ability to measure their use. Drums of oil, particularly used by those on low incomes,

are not always accessible – people must get the oil home and into their tank which can be challenging for the disabled or vulnerable. Rural areas often have a minimum delivery order and if people do not have £200, they go without.

Customer care registers - Energy suppliers hold a customer care register but most people do not know about this and struggle with the capacity and energy to register themselves. Some suggested that the register could be used to apply social tariffs to vulnerable people with high energy use to help mitigate their energy costs.

Smart meters - There were many calls for the introduction of smart meters to help consumers and allow data to be captured on energy usage, underconsumption and help with measuring fuel poverty. Smart meters can help customers see what appliances cost the most to use and may help change behaviour to make savings. There is a feeling that suppliers have no way of knowing that a customer has ‘self-disconnected’ and therefore no help can be offered.

Standards of work and redress - stakeholders want work carried out in the home to be of a good standard. New schemes should have retrofitting standards with regular review to ensure quality of work. Setting standards would build trust and confidence. There were suggestions for a trusted trader mark and government websites to provide links

to energy advice and trusted suppliers. It was noted that anyone looking to carry out energy efficiency improvements on their home should be able to find good, trusted companies. Stakeholders also said that anyone should be able to point out if things go wrong, and for problems to be resolved.

‘Have trusted partners who are trusted to know what is needed in a home, that they will not rip people off and will have high standards’

It was recognised that this would need investment and more training and skills development, including upskilling for the existing workforce. Some people noted that work carried out in the past was sometimes of a poor quality, citing installation of solar panels that led to leaks in the roof and disability amendments.

7. Appendices

APPENDIX A - FUEL POVERTY PROJECT BOARD

Angus Kerr – Department for Communities – Director of Climate Change Division – Chair

Meabh Cormacain – Department for Communities

Una McConnell - Department for Communities

Noyona Chundur – Consumer Council NI

Jane Corderoy – Department of Agriculture, Environment and Rural Affairs - Climate Change, Science & Innovation

Kieran Devlin - Department for Communities - Housing and Sustainability

Sinead Dynan – Northern Ireland Authority for Utility Regulation

Gary McGouran - Department for Communities

Colin Moffett – The Executive Office - International Relations

Elma Newberry – Northern Ireland Housing Executive - Director of Development

Liz Redmond – Department of Health – Director of Population Health

Carl Savage - Department for Communities - Engaged Communities Group

David Tarr - Department for Communities - Work & Health

Ryan White – Department for the Economy - Energy Group

APPENDIX B - FUEL POVERTY REFERENCE PANEL

Angus Kerr Department for Communities – Director of Climate Change Division – Chair

Meabh Cormacain – Department for Communities

Una McConnell - Department for Communities

Celeste McCallion – Department for Communities - Corporate Services Group (CSG)

Alan Mitchell - Fermanagh and Omagh Council

Alex Tennant - Northern Ireland Commissioner for Children and Young People

Nuala Toman - Disability Action

Nigel Brady – Bryson Energy

Pat Austin – National Energy Action

Wilma Stewart – Age NI

Tracey Colgan – Public Health Agency

Paul McKenzie – Ulster University

Lucie Middlemiss – University of Leeds

Siobhan Harding – Women’s Support Network

Justina Corcoran – Department of the Environment, Climate and Communications (ROI)

Graham Smith – Consumer Council NI

APPENDIX C - FOCUS GROUPS

DATE	LOCATION	GROUP
25 April 2024	Atlas Women's Centre, Lisburn	Women's group facilitated by the Women's Resource Network
13 May 2024	Online	BAME community workers, organised by StepNI
13 May 2024	Online	Disabled women's group, organised by Disability Action
15 May 2024	Online	Disabled men's group, organised by Disability Action
16 May 2024	Online	End-of-life care professionals, facilitated by Marie Curie
29 May 2024	NICVA	Discussion with Roma community worker
17 June 2024	Online	Focus group with foodbank users, organised by Foyle Foodbank
17 June 2024	Cookstown	Rural focus group, organised by Rural Community Network
25 June 2024	Online	Carers representative discussion, organised by Carers NI
26 June 2024	Online	Traveller community workers discussion, organised by Step NI and Travellers Community Support
27 June/ 8 August 2024	Online	Older people discussion, facilitated by Age NI
6 September 2024	Causeway Exchange	Representatives from heating, insulation, renewable energy sectors, NIHE, Utility Regulator and colleagues from DfE
20 September 2024	Causeway Exchange	Representatives from heating, insulation, renewable energy sectors, NIHE, Utility Regulator and colleagues from DfE

APPENDIX D - ORGANISATIONS WHO ATTENDED WORKSHOPS:

Advice NI	Department for Communities
Advice Space	Department for the Economy
Age NI	Department of Health
Alliance Party	Derry and Strabane Council
Antrim and Newtownabbey Council	Dry Arch Centre
Ards and North Down Council	East Belfast Community Development Agency
Ballysillan Community Forum	Electric Ireland
Barnardo's	Energy Saving Trust
Belfast City Council	Energy Store
Belfast Healthy Cities	Evolve Network
Bogside & Brandywell Health Forum	Fermanagh and Omagh Council
Bolster Community	Firebird
Bryson	Firmus Energy
Budget Energy	Forward South
Causeway Coast and Glens Council	Foyle Foodbank
Christians Against Poverty	Glen Development Initiative
Click Energy	Hillcrest Trust
CMG Energy Consultants	Lisburn and Castlereagh Council
Commissioner For Older People	Marie Curie
Community Advice Ards and North Down	Mid and East Antrim Council
Community Advice Fermanagh	Mid Ulster Age Well
Consumer Council NI	Mid Ulster Council
Cookstown & Western Shores Area Network	National Economic and Social Council Ireland
Credit Union	

National Energy Action

Newry, Mourne and Down Council

Northern Ireland Federation of Housing Associations

Northern Ireland Housing Executive

Phoenix Energy

Power NI

Private Individual

Queen University Belfast

Refresh NI

Sinn Fein Party

South City Resource & Development

SSE

Step NI

Tada Rural Support Network

Trussell Trust

Utility Regulator NI

Vineyard Compassion

Waterside Neighbourhood Partnership

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