



Renfrewshire Council

To: Infrastructure, Land & Environment Policy Board

On: 24th January 2018

Report by: Director of Finance & Resources

Heading: Renfrewshire Council response to the Scottish Government's Fuel Poverty Strategy Consultation

1. Summary

- 1.1. The Scottish Government has invited responses to their proposed Fuel Poverty Strategy which is available at <https://consult.gov.scot/better-homes-division/fuel-poverty/>
- 1.2. This response from Renfrewshire Council is submitted with this paper for approval by the Board.

2. Recommendations

- 2.1 That the response be approved for submission.
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3. Background

- 3.1 The Scottish Government have launched a consultation on their Fuel Poverty Strategy. Responses are asked to be submitted before 1st of February 2018.
- 3.2 The key elements in this consultation are described in this paper.

- 3.3 **Legislation.** The consultation includes a proposed revision of the fuel poverty definition. This will change the existing 10% of income on fuel to 10% of income after housing costs are subtracted. In addition, a reference to vulnerabilities is included in the new definition. A new Warm Homes Bill is proposed that will set interim targets in reducing fuel poverty.
- 3.4 **Policy.** The Scottish Government proposes that their primary action to support programmes to eliminate fuel poverty will be through the Scottish Energy Efficiency Programme (SEEP).
- 3.5 **Communities and partnership working.** The Scottish Government recognises the value of engaging with communities and working with them to deliver solutions that fit them best.
- 3.6 **Targets.** Proposed targets are forwarded for consultation. These are:
- Fuel poverty to be less than 20% by 2030
 - All homes to reach a minimum performance rating by 2040 with interim targets.
- 3.7 **Monitoring.** The change in the fuel poverty definition will require a change in the data collected, monitored and reported. Options are forwarded in the consultation.
- 3.8 **Outcomes and principles.** The Scottish Government is clear that the proposed strategy will be based on the principles of social justice and equality. The consultation recognises that the needs of individuals and families should be at the heart of the service design and delivery.
- 3.9 A draft from Renfrewshire Council is attached for consideration and approval by the board.
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Implications of the Report

1. **Financial – *none***
 2. **HR & Organisational Development - *none***
 3. **Community Planning
Greener - *none***
 4. **Legal - *none***
 5. **Property/Assets - *none***
 6. **Information Technology - *none***
 7. **Equality & Human Rights - *none***
 8. **Health & Safety - *none***
 9. **Procurement - *none***
 10. **Risk - *none***
 11. **Privacy Impact - *none***
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List of Background Papers

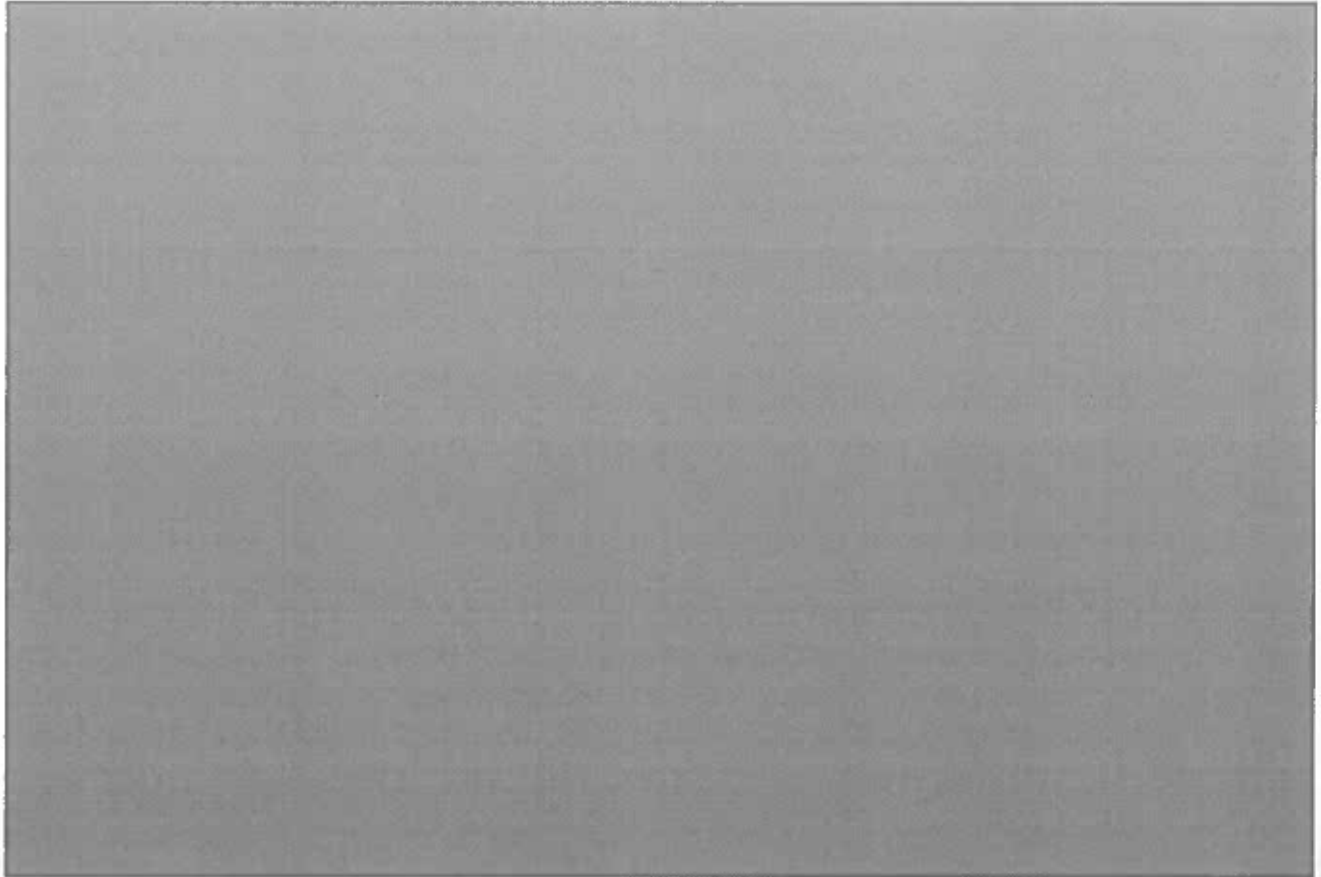
- (a) Background Paper 1 – Scottish Government Fuel Poverty Strategy Consultation.
- (b) Renfrewshire Council response to the Scottish Government's fuel poverty strategy consultation.

The foregoing background papers will be retained within Finance and Resources for inspection by the public for the prescribed period of four years from the date of the meeting. The contact officer within the service is Craig Doogan, Energy Manager, Tel. 0141-618 6198, e-mail address: craig.doogan@renfrewshire.gov.uk.

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Renfrewshire Council response to;

**Consultation on a Fuel Poverty Strategy for
Scotland**



**Prepared by Ron Mould
Date: November 2017
Version number: 0-1**



Consultees.

The following is a list of those organisations and individuals with whom the Council consulted in drafting this document.

Organisation
Renfrewshire Council: Development & Housing Services
Local Energy Action Partnership (LEAP)
Connect for Renfrewshire (C4R)
Recovery Across Mental Health (RAMH)
Scottish National Health Service (SNHS)
Renfrewshire Council: Children's Services
Home Energy Scotland (HES)
Citizens Advice Bureau (CAB)

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Executive summary

This is Renfrewshire Council's response to the Scottish Government's consultation on a Fuel Poverty Strategy for Scotland, January 2018. Renfrewshire Council is supportive of all efforts to mitigate fuel poverty. We are encouraged by the serious consideration that the Scottish Government has given the issue of Fuel Poverty.

We recognise the considerable sums that the Scottish Government has invested in improving the housing stock. It is unquestionable that this investment has improved the energy efficiency of the stock and had an impact on fuel poverty levels.

We welcome the Scottish Government's considerations of the definition of fuel poverty and proposed revisions. We note the inclusion of vulnerability as an enhancement of the definition. Though the Scottish Government is showing the leadership to meaningfully revise the definition of fuel poverty we are minded that programmes and actions could be further developed. We would suggest that a fabric only approach will not deliver significant reductions in fuel poverty, nor will a fabric first with existing advice services. We would respectfully request that provision of advice and support services be included in the strategy to maximise impact.

1 Renfrewshire Council Area

Renfrewshire Council was created in 1996 following the break-up of Strathclyde Regional Council. Renfrewshire is the ninth largest Council area in Scotland and is home to a population of 170,000 people, which is 3% of the total Scottish Population. Renfrewshire Council has a variety of Public Buildings, which number in excess of 260 and include education establishments, libraries, offices, recreational buildings etc. There are almost 84,000 homes in Renfrewshire area of which about 12,000 are in council ownership.

The main areas of population are shown in the map in **Figure 1**.

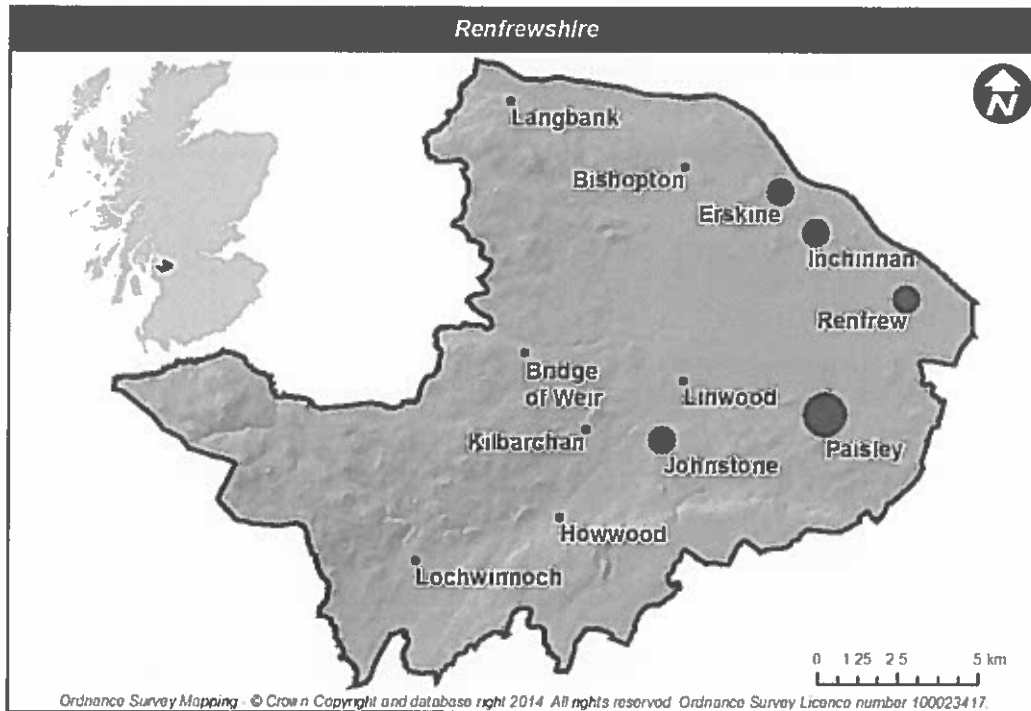


Figure 1 – Main areas of population in Renfrewshire

The council area is characterised as urbanised in its eastern, northern and southern boundaries while its western boundary contains peri-urban, rural and remote rural areas.

2 Responses to question

Renfrewshire Council supports the Scottish Government in their revisions of the definition and careful consideration of our existing definition of Fuel Poverty.

Though we are supportive, we raise a number of concerns in our reply which we believe should be addressed. We note that Scotland has made considerable progress in improving the energy efficiency of the housing stock and this has mitigated the levels of fuel poverty. However, this has not eliminated fuel poverty. We therefore encourage the Scottish Government to realise that fuel poverty mitigation requires building fabric and direct engagement with householders, preferably through face-to-face advocacy. We therefore consider the Scottish Governments further commitments to eliminate Fuel Poverty, though commendable could be further enhanced.

2.1 Comments on the new definition of fuel poverty

Do you have any comments on this new definition of fuel poverty, in particular, what do you think about the proposal to use After Housing Costs (AHC) and Minimum Income Standard (MIS) as means to measure fuel poverty in Scotland?

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

and

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

Renfrewshire Council commend the Scottish Government in its selection of members of the expert review panel and in tasking them to review the current definition. Renfrewshire Council would also note the thoroughness of the panel's work and welcomes their recommendations.

In respect to the specific issues raised above in this question:

- a). In order to report on progress towards targets set for the revised definition additional data must be collected. Data collection is a challenge and has to be reliable, it must be collected at a reasonable sample size in a small enough timescale.

- b). Data collection can only be addressed through investing in appropriately trained staff, that are effectively resourced. We would suggest that the impartiality of that data is

important and therefore it should be collected or verified through appropriate audits independently from those reporting organisations.

2.2 Comments on 75 years as a threshold

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?

Setting an age of 75 is a crude means of defining vulnerability. A minimum age of 75 is based on an assumption of people aging well, that is that people maintain a reasonable health after retirement. This is far from true. The average age at death in Renfrewshire is 76.3¹ while it is 77.1 in Scotland. Na h-Eileanan Siar average age at death is reported as 76.7. Fuel poverty in Renfrewshire is one of the lowest rates while it is one of the highest in Na h-Eileanan Siar. Therefore with a cursory glance at the available statistics we do not believe that there is as strong a correlation with age and vulnerability to fuel poverty as there is age + low income and fuel poverty. Further research into the detailed aspects of vulnerability might be appropriate.

Since we consider that fuel poverty and poor ageing is associated with low incomes we would suggest that it would be more appropriate to consider setting receipt of a state pension as only income, (not pension credit), as qualifying criteria. In doing so, the criteria is no longer wholly based on age but on a combination of age and low income.

We would also note that vulnerability to fuel poverty might be better framed in terms of an individual or household's capabilities for dealing with and resolving the challenges they face in respect to domestic energy use^{2,3}.

We believe that the Scottish Government concurs with current research⁴ that further work is required to better understand the term 'vulnerable to the adverse health and wellbeing impacts of living in fuel poverty'. We would look to support the Scottish Government in any way reasonably possible to improve our understanding of this.

¹ National Records of Scotland: Life expectancy for administrative areas within Scotland 2013-2015
<https://www.nrscotland.gov.uk/statistics-and-data/statistics/statistics-by-theme/life-expectancy/life-expectancy-in-scottish-areas/2013-2015/list-of-tables>

² Middlemiss, L. and Gillard, R., 2015. *Fuel poverty from the bottom-up: Characterising household energy vulnerability through the lived experience of the fuel poor: Energy Research and Social Science*, 6, 146-154
<http://www.sciencedirect.com/science/article/pii/S2214629615000213>

³ Mould, R. & Baker, KJ., 2017, 'Documenting fuel poverty from the householders' perspective' *Energy Research & Social Science*, 10.1016/j.erss.2017.06.004

⁴ Ibid.

2.3 Comments on island communities

In relation to island communities, are there any additional

- a) Challenges; and/or
- b) Opportunities

That we need to consider in developing our strategy?

There are no island communities within the Renfrewshire area and therefore this is not a challenge that we face and are familiar with. We would therefore defer to the island councils to comment appropriately on this.

2.4 Comments on rural communities

In relation to rural and remote communities, are there any additional

- a) Challenges; and/or
- b) Opportunities

That we need to consider in developing our strategy?

Renfrewshire Council has a mix of urban and rural communities. We recognise that the solutions for urban areas are not necessarily those for rural areas. We would note that there are many isolated communities in the Highlands but these also exist on the peripheries of the Central Belt and across the South of Scotland.

a). The diversity of the housing stock in rural areas makes upscaling of projects difficult. The lower density of housing is also a challenge as this involves longer distances and times travelling for contractors.

b). We believe that the greatest opportunities arise in rural areas arise through community based groups working in partnership with contractors to facilitate access and engagement.

2.5 Comments on identifying the fuel poor

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 Scottish Government has suggested that we need to do more to mitigate fuel poverty and that building fabric improvements alone may not be enough. Behaviour has been identified as being strongly influential in domestic energy use⁵. Additionally, behaviour change through engagement with householders has been recognised as having the potential to deliver energy savings in excess of those arising from fabric improvements alone⁶. There is also an increasing amount of evidence that illustrates the value that locally based face to face advocacy services can deliver⁷⁸⁹¹⁰. Many fuel poor are socially isolated through choice or circumstance. Telephone, leaflets and web based advice may not reach these householders. In order to engage with the socially excluded it is necessary to have face to face services available. The nature and structure of any such service should be tailored to meet the local needs and therefore we would advocate that these are organised at local authority level. We would urge the Scottish Government to consider ring fenced funding for each local authority to provide Advocacy services integrated with existing Home Energy Scotland (HES) services.

2.6 Comments on partnership working to meet aims

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.

Local groups can act as enablers, facilitators and trusted intermediaries. They act as a 'kent face' who can, through trust with the client, support them through projects to improve their living conditions. Many vulnerable households find government schemes intimidating and struggle with forms. Having a local advocate can support the clients through a process they could otherwise fall out of, can ensure that paperwork is completed timeously and that the client is kept fully informed.

Local partners also offer a means to engage with and contact householder's that would not engage with national schemes. They can therefore work with national delivery partners to increase uptake rates.

⁵ Haldi, F. and Robinson, D., 2011. *The impact of occupants' behaviour on building energy demand*. Journal of Building Performance, 4 (4) 323-338. Available from <http://dx.doi.org/10.1080/19401493.2011.558213>

⁶ Hui, B. and Steemers, K., 2014. *Energy retrofit and occupant behaviour in protected housing: A case study of the Brunswick Centre in London*. Energy and Buildings, 80, 120-130. Available from: <http://dx.doi.org/10.1016/j.enbuild.2014.05.019>

⁸ University of Sussex, Energy cafes can play a key role in targeting fuel poverty. <http://www.sussex.ac.uk/broadcast/read/42435>

⁹ Baker, K.J., & Stewart, F., 2017. *"Warm, friendly, reliable, and do what they say they do": An Evaluation of South Seeds' Energy Advocacy Services*. Glasgow Caledonian University & Dr Fraser Stewart, November 2017.

¹⁰ Reeves, A., 2016. *Exploring local and Community capacity to reduce fuel poverty: The case of Home Energy advice visits in the UK*. Energies, 9, 276-293

2.7 Comments on support from the SG to partners to report

How can SG support local delivery partners (eg third sector organisations and social enterprises) to measure their success?

Third party organisations are important partners but the onus should not be placed on them to undertake resource dense monitoring and reporting. For the sake of consistency, monitoring and reporting should rest with the local authorities. This approach has been undertaken previously in Scotland through the Home Energy Conservation Act (HECA) reporting.

We note that there is a balance between measurement and the necessary resources to deliver this. If the Scottish Government wishes detailed monitoring then it must fully account for these requirements in any funding awards. That is the funding for monitoring should be made in addition to any award.

We believe that if the Scottish Government wishes to see a consistent service of reliable quality with robust monitoring delivered to our citizens it should seek to work primarily with local authorities. This is not to diminish the importance of partners.

2.8 Comments on support from the SG to community groups for reporting

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?

The Scottish Government could fund advocacy services.

The Scottish Government could support community based reporting by allocating ring fenced funding for each authority to the HES, to maintain an advocacy service with clear targets and actions.

This money would only be drawn down by the Local Authorities establishing an advocacy service in their area. The HES would provide staff to be seconded to the LA. The LA would be obligated to provide office space for the advocates, provide them with access to their IT, collect and report on their outputs. The LA would be tasked with moulding the service to

meet their local needs through engaging with appropriate community partners, Scottish National Health Service (SNHS), social work and other community facing services. This is essentially the service delivery model used in Renfrewshire, Inverclyde and Clackmannanshire.

From our evidence, this advocacy service delivers a community benefit of £7 for every £1 invested when accounting only for the financial gains to the clients. Additional benefits accrue from joint working, improved health and well being outputs.

This will ensure a level of consistency in the nature of services available throughout Scotland. Despite the Scottish Government being informed contrary to this, we believe that there is at best an inadequate provision of face to face advocacy service funded directly by the Scottish Government. In many cases face to face advocacy is offered by third party, volunteers and community groups who struggle to secure funding, maintain consistency and quality.

2.9 Comments on the HES one-stop-shop

How can the one-stop-shop approach be enhanced for the benefit of the HES clients; and in particular,

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?

Renfrewshire Council recognises the important role and invaluable service offered by the HES and the one-stop –shop approach. However, we recognise that though this service meets the needs of a large element of our communities it does not necessarily meet the needs of our vulnerable householders. We believe that the HES should focus on the provision of its current services and how they might improve their delivery.

There is an undeniable need for face-to-face advice services since they engage with householders in their own homes, or places where they are most comfortable and least threatened. Despite reports from HES that such services are offered by them; we are concerned these are limited to a few members of staff and are inadequate to meet the needs and the demands of our most vulnerable.

We strongly believe that effective, proactive face-to-face services require local ownership and therefore local authorities must play an active role in their delivery. Local authorities must also take responsibility for the service offered in their area.

2.10 Comments on statutory target

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

We have concerns about this.

The previous target to eliminate fuel poverty has proven to be unachievable. If the Scottish Government continues to focus on similar programmes as previously (primarily building fabric improvements) it has to be realistic and accept that any future targets to eliminate fuel poverty may be unlikely to be achieved. We are therefore concerned that another unachievable target may be set to eliminate fuel poverty and advise against it.

2.11 Comments on proposed sub-targets

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?

We are concerned about these.

For the reasons stated in our response to the previous question we consider the overall target of eliminating fuel poverty may not be achievable with current responsibilities. Therefore we believe that the interim targets are potentially over ambitious and will only lead to a pointless criticism of the Scottish Government's failures.

Without a systematic evaluation of the impacts of policy tools currently available it is difficult to arrive at a recommendation for interim targets.

2.12 Comments on proposed interim milestones

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?

We are opposed to these.

For the reasons stated in our response to the previous questions.

2.13 Comments on Fuel Poverty Advisory Panel (FPAP) and Fuel Poverty Partnership Forum (FPPF) monitor progress

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 welcome these proposals.

We recognise the important work undertaken by the Scottish Fuel Poverty Forum (the Forum), Scottish Fuel Poverty Strategic Working Group (SWG) and the Scottish Rural Fuel Poverty Task Force (RFPTF).

2.14 Comments on FPAP and FPPF initial priorities

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

We support the Scottish Government in these proposals.

2.15 Comments on proxies

What examples do you have of using proxies to identify fuel or households?

- a) Which proxies did you use?
- b) Based on your experience, how well did these proxies work in accurately identifying fuel poor households?

We concur with the Scottish Government that current proxies are inadequate.

- a). Evidence indicates that there is very little, if any correlation, between the most common proxy of SIMD Income Domain distribution pattern with that of fuel poverty¹¹. This lack of

¹¹ Mould, R. and Baker, K., 2017. *Uncovering hidden geographies and socio-economic influences on fuel poverty using household fuel spend data: a meso-scale study in Scotland*. Indoor and Built Environment, [10.1177/1420326X17707326](https://doi.org/10.1177/1420326X17707326)

correlation results in higher funding levels being targeted at areas of lower fuel poverty and those of higher fuel poverty being disadvantaged in accessing funding.

In relation to the specific issues raised Renfrewshire Council has recently drafted its Statement of Intent (Sol) for ECO-Flex. In this document we have trusted partners empowered to make presentations of householders for ECO-Flex declarations. Our partners are;

- RAMH, the local mental health support organisation,
- Families First core team, a organisation that works with just coping and at risk families with children of primary school age.
- SNHS.

We believe that the clients of these organisations are vulnerable to, or at risk of becoming vulnerable to fuel poverty.

b). We have only drafted our EcoFlex Statement of Intent (Sol) and not put it in place to evaluate its effectiveness.

2.16 Comments on lessons from existing door to door projects

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?

We are encouraged that the Scottish Government recognises the need to do things differently. This should in no way diminish the value of building fabric improvement programmes. If we are to do things differently or additionally then we need to carefully consider our options.

We note that three of the outcomes from the Scottish Government from the 2012 evidence review require engagement with and support offered to vulnerable households. That is;

- There is an increased understanding by households of how to use energy
- Increased long term income for fuel poor households
- All households are able to enjoy adequate thermal comfort.

Also there is a fourth outcome which is arguably dependent on tailored advice being delivered to households. That is;

- Energy bills represent less hardship to lower income households

If these outcomes are firmly embedded in new and existing programmes we would expect this to be evident from support to local advocacy services aimed at engaging with households and addressing the above mentioned outcomes. Such services may enhance delivery of projects and are not separate from on-going area based projects. It is undeniable that HEEPS:ABS, SEEP and other area based schemes may have an important role in mitigating fuel poverty however they and programmes of this type have been the keystone

of achievements to date. It is evident they are not enough on their own and therefore at this juncture we look for new directions and investments in our communities to deliver their aspirations.

2.17 Comments on challenges on delivering door to door projects

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

We have concerns.

Our concerns are based on the apparent emphasis of door to door projects to the exclusion of other and additional approaches. We believe that there are two flaws in this approach;

- firstly that this is a fabric only approach
- secondly that this approach has been the mainstay of existing projects which have failed to eliminate fuel poverty to date and therefore we question its capacity to do so in the future.

We would also note that door to door approaches can be resource dense, requiring large numbers of individuals on the ground initially to establish contact with householders. The resource density is greatly increased by the most recent requirements from the Scottish Government for monitoring and reporting. The costs of monitoring in keeping with the Scottish Government's requirements are costly and we believe will act as a deterrent for LA making funding applications.

2.18 Comments on SG working with Community Planning Partnerships (CPP) to report on FP levels

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

Please refer to 2.15

2.19 Comments on outcomes focused approaches

What are your views on, or experience on how an outcomes-focused approach would work in practice?

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 believe there are flaws in the proposed Scottish Government's approach.

We recognise that an outcome focused approach can be an effective means of delivering aims. However, we note that to be wholly effective this should be a holistic approach that not only focuses on the outcomes but also the actions, processes and resources required to deliver these. We would support the Scottish Government in adopting such a holistic approach.

We have concerns that the capacity and abilities of the vulnerable may not be fully realised within projects to their potential disadvantage. We believe that more thought should be given to the nature of vulnerabilities and the capacities of the vulnerable to respond.

We believe that an outcomes focused approach could ultimately encourage national and local policy delivery partners to work together. We would suggest that the Scottish Government should consider more carefully the capacities of our most vulnerable, define their needs to mitigate their situations and design projects based on these findings. This approach differs from a building fabric first approach.

2.20 Comments on bullet points for the outcomes framework

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

We agree with the proposed principles.

We would look to the Scottish Government to show more evidence to support its commitment that the 'needs of individuals and families will be at the heart of service design'. As previously stated we have only seen evidence to support a fabric first approach and fabric focus to the detriment to alternative approaches.

2.21 Comments on outcomes framework strengthening partnerships

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

a) If so, how?

b) If not, why?

If the aim is to put the needs of individuals and families at the heart of the service why is the Scottish Government focusing on partnerships?

2.22 Comments on equalities impacts

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?

It would be hoped that any policy implemented to mitigate fuel poverty would have a positive effect on equalities through the reduction of inequalities.

2.23 Comments on impacts for business and delivery organisations

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

2.24 Comments on impacts on children

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?

Children may be disproportionately impacted upon through growing up in fuel poor households¹². The children may suffer long term poor health and diminished academic outcomes¹³. In Renfrewshire we have recognised the potential impacts on children and developed a multi-faceted client facing services that engages with just coping and vulnerable households. Through supporting the households we support the children indirectly.

¹² Pedro Guertler and Sarah Royston, *Fact-File: Families and Fuel Poverty*, Association for the Conservation of Energy <http://www.ukace.org/wp-content/uploads/2013/02/ACE-and-EBR-fact-file-2012-02-Families-and-fuel-poverty.pdf>

¹³ Walker, G. and Day, R., 2012. *Fuel poverty as injustice: Integrating distribution, recognition and procedure in the struggle for affordable warmth*. Energy Policy 49 69-75
<http://www.sciencedirect.com/science/article/pii/S0301421512000705?via%3Dihub>

